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

LEAD AGENCY AND ADDRESS: City of Los Angeles
                                      c/o Los Angeles City Engineer
                                      1149 Broadway, Suite 600
                                      Los Angeles, CA 90015-2213
                                    COUNCIL
                                    DISTRICT
                                    14

PROJECT TITLE: LAPD Evidence Warehouse

PROJECT LOCATION: The Project is located at 4671 Worth Street and 1925 North Mariana Avenue, Los Angeles, CA 90063. The Project is located within the El Sereno neighborhood of the Northeast Los Angeles Community Planning Area.

DESCRIPTION: The project involves the subdivision of a 6.6-acre lot located at the northwest corner of the Marianna Avenue and Worth Street. This lot will be subdivided to accommodate two projects. However, this Initial Study/Mitigated Negative Declaration (IS/MND) will only analyze the subdivision of the site and the construction of an approximately 80,000 square-foot warehouse within one of the two newly created parcels.

The warehouse will be constructed within a 128,118 square-foot (2.94-acre) site that has frontage on both Marianna Avenue and Worth Street. This building will contain three components, a larger warehouse, separate office space for Los Angeles Police Department (LAPD) evidence employees, and a separate office space for CATS (Commercial Auto Theft). A total of 237 parking spaces will be provided for the project. Access will be provided by two driveway connections along the north side of Worth Street and a ramp connection along the west side of Marianna Avenue.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:
Marc Blodgett, 2211 South Hacienda Boulevard, Suite 107 Hacienda Heights, California 91745

FINDING: The City Engineer of the City of Los Angeles has determined the proposed project will not have a significant effect on the environment. See attached Initial Study.

SEE THE ATTACHED PAGES FOR ANY MITIGATION MEASURES IMPOSED

Any written objections received during the public review period are attached, together with the responses of the lead City agency.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

PERSON PREPARING THIS FORM:
Talmage Jordan
Environmental Specialist II

ADDRESS:
1149 S. Broadway, Suite 600, MS 939
Los Angeles, CA 90015

TELEPHONE
NUMBER:
(213) 485-5754

SIGNATURE (Official):
Maria Martin, Environmental Affairs Officer
Environmental Management Group

DATE: 11/1/18
THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.
FINAL REVISED INITIAL STUDY
&
MITIGATED NEGATIVE DECLARATION

LAPD EVIDENCE WAREHOUSE
4671 WORTH STREET
LOS ANGELES, CALIFORNIA 90063

LEAD AGENCY:

CITY OF LOS ANGELES
PUBLIC WORKS, BUREAU OF ENGINEERING
1149 SOUTH BROADWAY
LOS ANGELES, CALIFORNIA 90015

REPORT PREPARED BY:

BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
2211 SOUTH HACIENDA BOULEVARD, SUITE 107
HACIENDA HEIGHTS, CALIFORNIA 91745

NOVEMBER, 2018

LACY 012
THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.
# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.0 Introduction</strong></td>
<td>5</td>
</tr>
<tr>
<td>1.1 Purpose of an Initial Study</td>
<td>5</td>
</tr>
<tr>
<td>1.2 Document Format</td>
<td>5</td>
</tr>
<tr>
<td>1.3 CEQA Process</td>
<td>6</td>
</tr>
<tr>
<td><strong>2.0 Project Description</strong></td>
<td>9</td>
</tr>
<tr>
<td>2.1 Project Purpose and Purpose of Initial Study</td>
<td>9</td>
</tr>
<tr>
<td>2.2 Project Location</td>
<td>10</td>
</tr>
<tr>
<td>2.3 Physical Characteristics of Proposed Project</td>
<td>11</td>
</tr>
<tr>
<td>2.4 Operational Characteristics of the Proposed Project</td>
<td>18</td>
</tr>
<tr>
<td>2.5 Construction Characteristics of the Proposed</td>
<td>19</td>
</tr>
<tr>
<td>2.6 Discretionary Actions and Other Agencies Whose Approval is Required</td>
<td>20</td>
</tr>
<tr>
<td><strong>3.0 Environmental Setting</strong></td>
<td>21</td>
</tr>
<tr>
<td><strong>4.0 Environmental Effects and Initial Study Checklist</strong></td>
<td>23</td>
</tr>
<tr>
<td>4.1 Aesthetics</td>
<td>32</td>
</tr>
<tr>
<td>4.2 Agriculture &amp; Forestry Resources</td>
<td>34</td>
</tr>
<tr>
<td>4.3 Air Quality</td>
<td>36</td>
</tr>
<tr>
<td>4.4 Biological Resources</td>
<td>46</td>
</tr>
<tr>
<td>4.5 Cultural Resources</td>
<td>52</td>
</tr>
<tr>
<td>4.6 Geology &amp; Soils</td>
<td>56</td>
</tr>
<tr>
<td>4.7 Greenhouse Gas Emissions</td>
<td>61</td>
</tr>
<tr>
<td>4.8 Hazards &amp; Hazardous Materials</td>
<td>64</td>
</tr>
<tr>
<td>4.9 Hydrology &amp; Water Quality</td>
<td>77</td>
</tr>
<tr>
<td>4.10 Land Use &amp; Planning</td>
<td>82</td>
</tr>
<tr>
<td>4.11 Mineral Resources</td>
<td>86</td>
</tr>
<tr>
<td>4.12 Noise</td>
<td>87</td>
</tr>
<tr>
<td>4.13 Population &amp; Housing</td>
<td>94</td>
</tr>
<tr>
<td>4.14 Public Services</td>
<td>96</td>
</tr>
<tr>
<td>4.15 Recreation</td>
<td>99</td>
</tr>
<tr>
<td>4.16 Transportation &amp; Circulation</td>
<td>100</td>
</tr>
<tr>
<td>4.17 Tribal Cultural Resources</td>
<td>105</td>
</tr>
<tr>
<td>4.18 Utilities</td>
<td>112</td>
</tr>
<tr>
<td>4.19 Mandatory Findings of Significance</td>
<td>117</td>
</tr>
<tr>
<td><strong>5.0 Mitigation Measures</strong></td>
<td>121</td>
</tr>
<tr>
<td><strong>6.0 Preparation and Consultation</strong></td>
<td>129</td>
</tr>
<tr>
<td><strong>7.0 Conclusion</strong></td>
<td>131</td>
</tr>
<tr>
<td><strong>8.0 References</strong></td>
<td>133</td>
</tr>
<tr>
<td><strong>9.0 Public Review Comments and Response to Comments</strong></td>
<td>135</td>
</tr>
</tbody>
</table>
THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.
1. INTRODUCTION

1.1. PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act (CEQA) was enacted in 1970 for the purpose of providing decision-makers and the public with information regarding environmental effects of proposed projects; identifying means of avoiding environmental damage; and disclosing to the public the reasons behind a project’s approval even if it leads to environmental damage. The Bureau of Engineering Environmental Management Division (EMD) has determined the proposed project is subject to CEQA and no exemptions apply. Therefore, the preparation of an Initial Study (IS) is required.

An IS is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the initial study concludes that the project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise the lead agency may adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND).

The IS/MND contained herein have been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended July 31, 2002).

1.2. DOCUMENT FORMAT

This Mitigated Negative Declaration was circulated for a 20-day public review and comment period which began on September 6, 2018. Minor revisions and changes to the IS/MND were made to reflect the input received. The City recirculated a Revised Mitigated Negative Declaration and Initial Study for a 20-day review period from October 11th, 2018 until October 31st, 2018. These changes are identified using the following conventions: additional or new material is noted using underlining while text that has been
deleted is noted using strikethrough text.

This MND is organized into eight nine sections as follows:

- **Section 1, Introduction**:  provides an overview of the project and the CEQA environmental documentation process.

- **Section 2, Project Description**:  provides a description of the project location, project background, project components, and proposed construction and operation.

- **Section 3, Existing Environment**:  provides a description of the existing environmental setting with focus on features of the environment, which could potentially affect the proposed project or be affected by the proposed project.

- **Section 4, Environmental Effects/Initial Study Checklist**:  presents the City’s Checklist for all impact areas and mandatory findings of significance.  Includes discussion and identifies applicable mitigation measures.

- **Section 5, Mitigation Measures**:  provides the mitigation measures that would be implemented to ensure that potential adverse impacts of the proposed project would be reduced to a less than significant level.

- **Section 6, Preparation and Consultation**:  provides a list of key personnel involved in the preparation of this report and key personnel consulted.

- **Section 7, Determination – Recommended Environmental Documentation**:  provides the recommended environmental documentation for the proposed project; and,

- **Section 8, References**:  provides a list of reference materials used during the preparation of this report.

- **Section 9, Comments and Response to Comments**:  provides a list of comments received during the public review period. This section also includes responses to the comments received.

### 1.3. CEQA PROCESS

Once the adoption of a ND (or MND) has been proposed, a public comment period opens for no less than twenty (20) days or thirty (30) days if there is state agency involvement. The purpose of this comment period is to provide public agencies and the general public an opportunity to review the initial study and comment on the adequacy of the analysis and the findings of the lead agency regarding potential environmental impacts of the proposed project. If a reviewer believes the project may have a significant effect on the environment, the reviewer should (1) identify the specific effect, (2) explain why it is believed the effect would occur, and (3) explain why it is believed the effect would be significant. Facts or expert opinion supported by facts should be provided as the basis of such comments.
After the close of the public review period, the Board of Public Works considers the ND or MND, together with any comments received during the public review process, and makes a recommendation to the City Council on whether or not to approve the project. One or more Council committees may then review the proposal and documents and make its own recommendation to the full City Council. The City Council is the decision-making body and also considers the ND or MND, together with any comments received during the public review process, in the final decision to approve or disapprove the project. During the project approval process, persons and/or agencies may address either the Board of Public Works or the City Council regarding the project. Public notification of agenda items for the Board of Public Works, Council committees, and City Council is posted 72 hours prior to the public meeting. The Board of Public Works Agenda is available via the internet at http://www.bpw.lacity.org/. The Council agenda can be obtained by visiting the Council and Public Services Division of the Office of the City Clerk at City Hall, 200 North Spring Street, Suite 395; by calling 213/978-1047, 213/978-1048 or TDD/TTY 213/978-1055; or via the internet at http://www.lacity.org/city-government/elected-official-offices/city-council-and-committee-meeting.

If the project is approved, the City will file a Notice of Determination with the County Clerk within 5 days. The Notice of Determination will be posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues presented to the lead agency by any person, either orally or in writing, during the public comment period.

As a covered entity under Title II of the Americans with Disabilities Act (ADA), the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities.
2. PROJECT DESCRIPTION

2.1 PROJECT PURPOSE AND PURPOSE OF THE INITIAL STUDY

The project involves the subdivision of a 6.6-acre lot located at the northwest corner of the Marianna Avenue and Worth Street. This lot will be subdivided to accommodate two projects. However, this Initial Study/Mitigated Negative Declaration (IS/MND) will only analyze the subdivision of the site and the construction of an approximately 80,000 square-foot warehouse within one of the two newly created parcels. Development of the second parcel is not being analyzed as part of this project because doing so would be speculative at this time. No particular development is planned or foreseeable for the second parcel at this time and any future development of the second parcel, if developed, would need to undergo a separate review when its use is known. A lead agency is generally not permitted to segment or piecemeal a project into smaller components if the purpose of this piecemealing is to avoid the full disclosure of environmental impacts. Again, the requirement arises from the definition of a CEQA project which includes the phrase "...whole of the action." This phrase has been interpreted by the California Supreme Court to mean that it is generally inappropriate to divide a larger project into smaller segments so as to avoid the preparation of an environmental impact report (EIR). It is important to note that the CEQA concept of a project refers to the underlying activity being approved by an agency, not just the government permits necessary to implement the project. Therefore, a lead agency may not treat each separate permit or approval as a separate project for purposes of evaluating environmental impacts. The rule against segmenting does not mean that every activity related to a proposed project’s implementation must be included in a single CEQA document. Rather, the California Supreme Court held that related actions only had to be included in a CEQA document when they were reasonably foreseeable, but not when they were remote and speculative.

The warehouse will be constructed within a 128,118 square-foot (2.94-acre) site that has frontage on both Marianna Avenue and Worth Street. This building will contain three components, a larger warehouse, separate office space for Los Angeles Police Department (LAPD) evidence employees, and a separate office space for CATS (Commercial Auto Theft). A total of 237 parking spaces will be provided for the project. Access will be provided by two driveway connections along the north side of Worth Street and a ramp connection along the west side of Marianna Avenue.

As part of the project, the Applicant, Camfield Partners L.L.C, c/o Mr. Ken Jackson, CEO, 8895 Research Drive, Irvine, California 92618) will be entering into a Purchase and Sale Agreement with the City in order to facilitate the construction of the project and the transfer of ownership of the property to the City’s Police Department. The Purchase and Sale Agreement will be discussed in further detail in subsection 2.5.

As part of the proposed project’s environmental review, the City of Los Angeles (the City), as the CEQA Lead Agency, authorized the preparation of this Initial Study. Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the City of Los Angeles, in its capacity as the Lead Agency. The primary purpose of CEQA is to ensure that decision-makers and the public understand the

---

environmental impacts of the proposed project and that decision-makers have considered such impacts before considering approval of the project. Pursuant to the CEQA Guidelines, purposes of this Initial Study include the following:

- To provide the City information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration;
- To facilitate the project's environmental assessment early in the design and development of the project;
- To eliminate unnecessary EIRs;
- To determine the nature and extent of any impacts associated with the proposed project; and,
- To enable modification of the project to mitigate adverse impacts of the project.

The City also determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the project's environmental review pursuant to CEQA. This Initial Study and the Notice of Intent to Adopt a Mitigated Negative Declaration will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. A 20-day public review period will be provided to allow these agencies and other interested parties to comment on the proposed project and the findings of this Initial Study.\(^2\) Questions and/or comments should be submitted to the following individual:

Maria Martin, Environmental Management Group Manager  
Los Angeles Department of Public Works Bureau of Engineering  
1149 South Broadway, Suite 600  
Los Angeles, California 90015  
maria.martin@lacity.org

2.2 PROJECT LOCATION

The proposed project site is located within the corporate boundaries of the City of Los Angeles in the El Sereno Community of the Northeast Los Angeles Community Plan Area. El Sereno is located approximately three miles northeast of Downtown Los Angeles. The community of El Sereno is bound on the north by the City of South Pasadena; on the east by the City of Alhambra; on the south by the City of Los Angeles communities of East Los Angeles and Boyle Heights, and the City of Monterey Park; and on the west by the communities of Montecito Heights and Lincoln Heights.\(^3\) Major physiographic features within the surrounding area include the San Gabriel Mountains, located approximately ten miles to the north; the San Rafael Hills, located six miles to the northeast; and the Los Angeles River, located 2.60 miles to the west.\(^4\)


\(^3\) Quantum GIS. Shapefile layers for Los Angeles County and the City of Los Angeles.

\(^4\) Ibid.
A regional location map is provided in Exhibit 2-1 and a map of the City is provided in Exhibit 2-2. The project site is located at the northwest corner of the Worth Street and Marianna Avenue intersection. The site’s legal address is 4671 Worth Street. The corresponding Assessor Parcel Numbers (APNs) include 5223-002-007 and 5223-002-015. Major roadways in the vicinity of the project site include Valley Boulevard, located 0.22 miles to the north; Soto Street, located 0.96 miles to the west; and Eastern Avenue, located 308 feet to the southeast.5 Regional access to the project site is provided ramp connections to the San Bernardino Freeway (I-10), located 1.32 miles to the southwest along Soto Street. A local map is provided in Exhibit 2-3.

2.3 Physical Characteristics of the Proposed Project

The proposed project involves the subdivision of an existing 6.6-acre site and the subsequent construction and operation of a warehouse that will be used by the Los Angeles Police Department (LAPD). The proposed project will consist of the following elements:6

- **Project Site.** The project site consists of a 128,118 square-foot (2.94-acre) parcel located along the north side of Worth Street and the west side of Marianna Avenue. The project Applicant is proposing, consistent with the purchase and sale agreement, to construct an approximately 80,000 square-foot warehouse. This building will contain three components, a larger warehouse, separate office space for LAPD evidence employees, and separate office space for CATS (Commercial Auto Theft).

- **LAPD Evidence Warehouse and Office.** The new warehouse will have a total floor area of approximately 80,000 square feet, a width (east-west) of 416 feet and a depth (north-south) of 203 feet. The building will also have a total height of 44 feet, a lot coverage of 54 percent, and a Floor Area Ratio (FAR) of 0.56 to 1.0. The warehouse will include multiple rooms each with a dedicated purpose. A 10,030 square-foot portion of the warehouse will be reserved for commercial auto theft (CATS). Other various amenities include a 2,500 square-foot break down room; a 4,300 square-foot sorting room; a 1,206 square-foot freezer that will be used to store organic evidence; a 5,025 square feet climate controlled room; a 2,600 square-foot auction staging room; and a 744 square-foot lobby, among others. Additionally, the Applicant will provide 46 bicycle racks with capacity for a total of 414 bicycles. These 46 bicycle racks will be located within the northern portion of the warehouse building. Furthermore, 10,086 square feet of office mezzanine will be included.

- **Parking and Access.** A total of 237 parking spaces will be striped. Of the total number of spaces that will be provided, 16 will be located south of the warehouse building, 20 spaces will be located within the warehouse, and 201 spaces will be located on the roof. A ramp leading up to the rooftop parking area will be installed along the northeast corner of the building along the west side of Marianna Avenue. The Applicant will also provide three dock high doors along the building's south facing elevation.

---


EXHIBIT 2-1
REGIONAL MAP
SOURCE: QUANTUM GIS
EXHIBIT 2-2
VICINITY MAP
SOURCE: QUANTUM GIS
EXHIBIT 2-3
LOCAL MAP
SOURCE: QUANTUM GIS
Access to the proposed project will be provided by two driveway connections located along the north side of Worth Street. The driveways will provide access to the visitor parking area, the LAPD employee parking area, and main warehouse. There will be a third driveway which will function as a fire access lane. This fire access lane will extend along the building’s northern and western sides and will be located within the adjacent parcel. The fire access lane will provide reciprocal access between the project and the future building that will be erected north of the evidence warehouse.

- **Infrastructure.** The proposed project will include various infrastructure improvements that will better accommodate the construction and operation of the new warehouse. The Applicant will provide a two-foot street dedication along the west side of Marianna Avenue and a ten-foot street dedication along the north side of Worth Street. In addition, the Applicant will install new utility lines within the project site. These new utility lines will be installed during the trenching phase prior to the erection of the warehouse. The project will also require the extension of an off-site water line to the project site. The site is not currently served by the Los Angeles Department of Water and Power and no City-owned water line connections exist in the immediate area. The project cannot connect to the water lines located to the south of the site since these lines serve the unincorporated portions of Los Angeles County. Therefore, a water line from the north will be extended to the project site. The extension of a City water line will necessitate the closure of a lane along Marianna Avenue to accommodate the trenching. The extension of the water line will also include the installation of two lateral lines (one for each parcel). The lateral line that will serve the project may connect to the northeast corner of the building, just south of the driveway that provides access to the roof. An existing sewer line extends along Worth Street in an east-west orientation. The project will continue to utilize this existing sewer line. Lastly, a total of two retaining walls will be installed. A nine-foot tall retaining wall will be provided along the site’s eastern boundary and an 11-foot high retaining wall will be provided along the site’s northern boundary.

- **Purchase and Sale Agreement.** The Applicant is entering into a Purchase and Sale Agreement with the City in order to facilitate the construction of the project and the transfer of ownership of the property to the Los Angeles Police Department (LAPD). As part of the project, the City will execute the Purchase and Sale Agreement and will contribute an initial deposit of funds to the Applicant pursuant to the terms of said agreement. This purchase agreement contains specific requirements that the Applicant must fulfill prior to transferring title of the property to the City. These specific requirements include that the Applicant will pursue and secure permits and approvals for completing the project, commence construction 60 days following the attainment of all final discretionary permits, comply with the design guidelines provided by the Bureau of Engineering, and comply with DTSC’s Restrictive Covenant on the property to preclude certain land uses from the property. Upon the Applicant’s completion of the project’s construction, subject to the terms of the Purchase and Sale Agreement, the City will accept the conveyance and delivery of ownership to the property and facilities and be responsible for operation of the project.

The site plan is shown in Exhibit 2-4. Conceptual elevations for the project are shown in Exhibit 2-5. A summary table is shown in Table 2-1 provided on the following pages.
EXHIBIT 2-4
CONCEPTUAL SITE PLAN
Source: Carlile Coatsworth Architects
EXHIBIT 2-5
CONCEPTUAL BUILDING ELEVATIONS
Source: Carlile Coatsworth Architects
### 2.4. OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT

The project will be open 24 hours a day seven days a week, though limited activity will take place during the evening. Approximately 32 new jobs will be created: 10 for evidence (daytime) and 22 for CATS (likely 24/7) on rotating shifts. The facility will have minimal staffing during the evening hours. The warehouse will be occupied by the Los Angeles Police Department, who will primarily use this building for the storage of evidence and fleet vehicles. Various forms of evidence will be processed and stored on-site, including but not limited to, biological evidence and inorganic evidence such as vehicles impounded by the Department. Ancillary features such as a bio-hazard disposal bin, eyewashes, freezers, and lab tables will be provided. Biological evidence will be processed and analyzed in the break down room. From there, the evidence will either be discarded in the bio-hazard disposal bin or stored away in the freezer room. The evidence employees will be required to adhere to all Division of Occupational Safety and Health, Fire Department, Department of Public Health, and Department of Toxic Substances Control requirements. Furthermore, Material Safety Data Sheet compliant chemical lockers will be included.

The warehouse will also contain vehicles impounded by the Department. These vehicles will be stored within the CATS section of the warehouse. CATS investigators will conduct auto theft investigations involving organized theft groups, chop shops, receivers of stolen vehicles, and components parts. CATS further conduct complex theft investigations on a citywide basis. In addition, CATS is also responsible for investigating cargo hijacking. Cargo hijacking involves the theft and/or hijack of commercial vehicles where the object is cargo.

Often these thefts involve “Hijack/Kidnap” of commercial vehicles by force or fear, or by forcing the drivers to transport the property against their will. The CATS division currently has a total of 17 vehicles in their section, including three bait cars. These bait cars represent the most commonly stolen. They are electronically monitored and can be turned off remotely. Vehicles will enter the CATS area via a ramp that will be provided along the east side of the CATS area.

An auction room will be provided. This will allow the Department to auction off evidence, most notably vehicles, to the general public. An ancillary 2,600 square-foot auction staging room will be provided. Lastly, the new warehouse facility will also accommodate the long-term storage of 100 fleet vehicles. These vehicles will be stored on the roof deck. Since these vehicles will be stored long-term, a minimal number of

---

**Table 2-1**

<table>
<thead>
<tr>
<th>Project Element</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Site Area</td>
<td>287,496 sq. ft. (6.6 acres)</td>
</tr>
<tr>
<td>Project Site Following the Subdivision</td>
<td>128,118 sq. ft. (2.94 acres)</td>
</tr>
<tr>
<td>Total Building Floor Area</td>
<td>+/- 80,000 sq. ft.</td>
</tr>
<tr>
<td>Floor Area Ratio (FAR) and Lot Coverage</td>
<td>0.56 to 1.0 and 54%</td>
</tr>
<tr>
<td>Total Height</td>
<td>44 feet</td>
</tr>
<tr>
<td>Parking Provided</td>
<td>237 spaces (16 ground level, 20 within the building, and 201 on the roof)</td>
</tr>
<tr>
<td>Truck Doors</td>
<td>3 doors</td>
</tr>
</tbody>
</table>

Source: Carlile Coatsworth Architects
daily trips will result. The project will result in two to three truck trips per week, and up to three small truck trips per day of fleet vehicles.

2.5. CONSTRUCTION CHARACTERISTICS OF THE PROPOSED PROJECT

The construction phase for the proposed project would take approximately 13 months to complete. The key construction phases are outlined below:

- **Site Preparation.** The project site will be readied for the construction of the proposed project. This phase will take approximately one month to complete and includes the clearing and grubbing of the site. In addition, all of the trees that are located adjacent to the project site along Marianna Avenue will be removed.

- **Grading.** This phase will involve the grading, trenching, and excavation of the site. The building’s footings and new utility lines will be installed during this phase. In addition, the site will be rebalanced. Grading is expected to reach up to depths of nine feet below ground surface (BGS). While the amount of import and export has not yet been determined, a worst case scenario was prepared. Under a worst case scenario, the project will require the removal of up to 39,411 cubic yards of earth (assuming the entire site was excavated to a depth of nine feet bgs). A stock pile of clean fill is currently stored on-site. The use of this clean fill will reduce the number of truck trips that will be required to haul new import fill. This phase will take two months to complete.

- **Grading/Water Line Extension.** This phase will involve the temporary closure of a portion of Marianna Avenue. The asphalt will be removed and a portion of the street will be trenched to accommodate the extension of the City-owned water line. Once the water line right-of-way has been excavated, the project team will be able to install the new water line and ancillary lateral lines. This phase will take two months to complete.

- **Construction.** The new concrete tilt-up warehouse will be constructed during this phase. This phase will take approximately four months to complete.

- **Paving.** The parking areas and internal drive aisles will be paved during this phase. Equipment used on-site during this phase would include cement and motor mixers, pavers, rollers, and other paving equipment. This phase will take approximately one month to complete.

- **Landscaping and Finishing.** This phase will involve the planting of landscaping, painting of the warehouse, and the completion of the on-site improvements. The street trees that will be removed along the west side of Marianna Avenue will be replaced during this phase pursuant to the conditions outlined in the mandatory Tree Removal Permit. This phase will last approximately three months.
2.6. DISCRETIONARY ACTIONS AND OTHER AGENCIES WHOSE APPROVAL IS REQUIRED (PERMITS, FEES, LICENSES, AND TRIBAL CONSULTATION)

DISCRETIONARY ACTIONS: A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Los Angeles) that calls for an exercise of judgment in deciding whether to approve a project. Anticipated approvals or permits for the proposed project include, but are not limited to, the following:

- City of Los Angeles City Council adoption of the Mitigated Negative Declaration (MND).
- City of Los Angeles City Council, execution of a purchase and sale agreement regarding the development by and conveyance of the property from the Applicant to the City of Los Angeles for the City of Los Angeles's use and operation of the facilities on the property;
- City of Los Angeles Department of City Planning, Tentative Parcel Map to realign the site’s existing parcel boundaries (the site consists of two parcels);
- City of Los Angeles Department of City Planning, Site Plan Review for a building larger than 50,000 square feet;
- City of Los Angeles Board of Public Works Commission, Tree Removal Permit to remove street trees; and,
- Acceptance of the property and facilities after completion by the City.

OTHER AGENCIES WHOSE APPROVAL IS REQUIRED: The project would require various ministerial approvals such as building permits, grading permits, business licenses, occupancy permits, and a permit to connect to the City’s water and sewer lines. The project would also be required to submit a Notice of Intent to comply with the General Construction Activity NPDES Permit to the State Water Resources Control Board.

NATIVE AMERICAN AND TRIBAL CONSULTATION: California Native American tribes traditionally and culturally affiliated with the project area that requested consultation pursuant to Public Resources Code section 21080.3.1 has occurred. Formal Native American Consultation Pursuant to AB-52 has been initiated and contact with the Native American Heritage Commission (NAHC) has been completed.
3. **ENVIRONMENTAL SETTING**

The project site is located in an urban setting and is surrounded on all sides by development. An aerial photograph is presented in Exhibit 3-1. Surrounding land uses and development in the vicinity of the project site include the following:

- **North of site.** Industrial uses abut the project site to the north. A Southern Pacific Railroad right-of-way (ROW) extends in a northeast to southwest orientation along the northwest corner of the project site. Valley Boulevard is located further north.

- **South of site.** Worth Street extends along the south side of the project site in an east to west orientation. Industrial uses occupy frontage along the south side of Worth Street.

- **East of site.** Marianna Avenue is located adjacent to the project site. An apartment complex is located along the east side of Marianna Avenue.

- **West of site.** An industrial building and the Southern Pacific Railroad ROW abut the site to the west.

The project site is presently undeveloped and is covered over in dirt, rocks, grass, garbage, a stockpile of fill, and sparse ruderal vegetation. The site is fenced off on all sides by a chain link fence.

The project site is presently zoned MR1-1 (*Restricted Industrial*). The site’s land use designation in the Northeast Los Angeles Community Plan is Limited Industrial.
EXHIBIT 3-1
AERIAL PHOTOGRAPH
Source: Google Earth
This section of the Initial Study prepared for the proposed project analyzes the potential environmental impacts that may result from the proposed project’s implementation. The issue areas evaluated in this Initial Study include the following:

- Aesthetics (Section 4.1);
- Agriculture and Forestry Resources (Section 4.2);
- Air Quality (Section 4.3);
- Biological Resources (Section 4.4);
- Cultural Resources (Section 4.5);
- Geology and Soils (Section 4.6);
- Greenhouse Gas Emissions (Section 4.7);
- Hazards and Hazardous Materials (Section 4.8);
- Hydrology and Water Quality (Section 4.9);
- Land Use and Planning (Section 4.10);
- Mineral Resources (Section 4.11);
- Noise (Section 4.12);
- Population and Housing (Section 4.13);
- Public Services (Section 4.14);
- Recreation (Section 4.15);
- Transportation (Section 4.16);
- Tribal Cultural Resources (Section 4.17);
- Utilities and Service Systems (Section 4.18); and,
- Mandatory Findings of Significance (Section 4.19).

Under each issue area, a description of the thresholds of significance is provided. These thresholds will assist in making a determination as to whether there is a potential for significant impacts on the environment. The analysis considers both the short-term (construction-related) and long-term (operational) impacts associated with the proposed project’s implementation, and where appropriate, the cumulative impacts. To each question, there are four possible responses:

- **No Impact.** The proposed project will not result in any adverse environmental impacts.

- **Less than Significant Impact.** The proposed project may have the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of Los Angeles or other responsible agencies consider to be significant.

- **Less than Significant Impact with Mitigation.** The proposed project may have the potential to generate a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of the recommended mitigation measures.

- **Potentially Significant Impact.** The proposed project may result in environmental impacts that are significant. This finding will require the preparation of an environmental impact report (EIR).

The environmental analysis provided in this section of the Initial Study indicates that the proposed project will not result in any unmitigable, significant impacts on the environment. For this reason, the City of Los Angeles determined that a Mitigated Negative Declaration is the appropriate CEQA document for the proposed project. The findings of this Initial Study are summarized in Table 4-1 provided below and on the following pages.
Table 4-1
Summary (Initial Study Checklist)

<table>
<thead>
<tr>
<th>Environmental Issue Area Examined</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

### SECTION 4.1 AESTHETIC IMPACTS. Would the project:

a) Have a substantial adverse effect on a scenic vista? X

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? X

c) Substantially degrade the existing visual character or quality of the site and its surroundings? X

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? X

### SECTION 4.2 AGRICULTURE & FORESTRY RESOURCES IMPACTS. 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? X

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? X

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? X

d) Result in the loss of forest land or conversion of forest land to a non-forest use? X

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? X

### SECTION 4.3 AIR QUALITY IMPACTS. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan? X

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? X

c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? X
<table>
<thead>
<tr>
<th>Environmental Issue Area Examined</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>d) Expose sensitive receptors to substantial pollutant concentrations?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>e) Create objectionable odors affecting a substantial number of people?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

**SECTION 4.4 BIOLOGICAL RESOURCES IMPACTS. 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, or U. S. Fish and Wildlife Service? |                                 |                                                        | X                           |           |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service? |                                 |                                                        | X                           |           |
| c) Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? |                                 |                                                        | X                           |           |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? |                                 |                                                        | X                           |           |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? |                                 |                                                        | X                           |           |
| 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? |                                 |                                                        | X                           |           |

**SECTION 4.5 CULTURAL RESOURCES IMPACTS. Would the project:**

| a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? |                                 |                                                        | X                           |           |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? |                                 |                                                        | X                           |           |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? |                                 |                                                        | X                           |           |
| d) Disturb any human remains, including those interred outside of formal cemeteries?                   |                                 |                                                        | X                           |           |
### Table 4-1
Summary (Initial Study Checklist)

<table>
<thead>
<tr>
<th>Environmental Issue Area Examined</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### SECTION 4.6 GEOLOGY & SOILS IMPACTS. Would the project:

- **a)** Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - 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.
  - Strong seismic ground-shaking?
  - Seismic-related ground failure, including liquefaction?
  - Landslides?

  X

- **b)** Result in substantial soil erosion or the loss of topsoil?

  X

- **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?

  X

- **d)** Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

  X

- **e)** Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

  X

#### SECTION 4.7 GREENHOUSE GAS EMISSIONS IMPACTS. Would the project:

- **a)** Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

  X

- **b)** Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

  X

#### SECTION 4.8 HAZARDS & HAZARDOUS MATERIALS IMPACTS. Would the project:

- **a)** Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

  X

- **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?

  X

- **c)** Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

  X
### Table 4-1
Summary (Initial Study Checklist)

<table>
<thead>
<tr>
<th>Environmental Issue Area Examined</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>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 a public use airport, would the project result in a safety hazard for people residing or working in the project area?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>g) Impair implementation of or physically interfere with, an adopted emergency response plan or emergency evacuation plan?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

### SECTION 4.9 HYDROLOGY & WATER QUALITY IMPACTS. Would the project:

| a) Violate any water quality standards or waste discharge requirements?                                                                                                                                         |                               | X                                                                 |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? |                               | X                                                                 |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?                     |                               | X                                                                 |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? |                               | X                                                                 |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?                     |                               | X                                                                 |
| f) Otherwise substantially degrade water quality?                                                                                                                                                    |                               | X                                                                 |
| g) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?                                            |                               | X                                                                 |
### Table 4-1
Summary (Initial Study Checklist)

<table>
<thead>
<tr>
<th>Environmental Issue Area Examined</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>j) Inundation by seiche, tsunami, or mudflow?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

#### SECTION 4.10 LAND USE & PLANNING IMPACTS. Would the project:

| a) Physically divide an established community?                                                   |                               |                                                          | X                           |           |
| b) Conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? |                               |                                                          | X                           |           |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? |                               |                                                          |                             | X         |

#### SECTION 4.11 MINERAL RESOURCES IMPACTS. 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? |                               | X                           |                             |           |
| 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? |                               | X                           |                             |           |

#### SECTION 4.12 NOISE IMPACTS. Would the project result in:

| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? |                               | X                           |                             |           |
| b) Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels? |                               | X                           |                             |           |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above noise levels existing without the project? |                               |                             | X                           |           |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? |                               |                             | X                           |           |
| e) For a project located with 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? |                               |                             | X                           |           |
### Table 4-1
Summary (Initial Study Checklist)

<table>
<thead>
<tr>
<th>Environmental Issue Area Examined</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

#### SECTION 4.13 POPULATION & HOUSING IMPACTS. Would the project:

a) Induce substantial 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)? X

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? X

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? X

#### SECTION 4.14 PUBLIC SERVICES IMPACTS. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in any of the following areas:

a) Fire protection services? X

b) Police protection services? X

c) School services? X

d) Parks? X

e) Other governmental services? X

#### SECTION 4.15 RECREATION IMPACTS. Would the project:

a) 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? X

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? X

#### SECTION 4.16 TRANSPORTATION & CIRCULATION IMPACTS. Would the project:

a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? X
<table>
<thead>
<tr>
<th>Environmental Issue Area Examined</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) Result in inadequate emergency access?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

**Section 4.17 Tribal Cultural Resources.** Would the project cause a substantial adverse change in the significance of a tribal cultural resources, 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:

- a) 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). X X
- b) 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 tribe. X

**Section 4.18 Utilities Impacts.** Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? X
- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? X
- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? X
Table 4-1
Summary (Initial Study Checklist)

<table>
<thead>
<tr>
<th>Environmental Issue Area Examined</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>g) Comply with Federal, State, and local statutes and regulations related to solid waste?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

SECTION 4.19 MANDATORY FINDINGS OF SIGNIFICANCE. *The approval and subsequent implementation of the proposed project:*

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th>X</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Does the project have the potential to 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, 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?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>b) Does the project have impacts that are individually limited, but cumulatively considerable? (&quot;Cumulatively considerable&quot; 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)?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
4.1 AESTHETICS

4.1.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant aesthetic impact if it would:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or,
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4.1.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project have a substantial adverse effect on a scenic vista? • No Impact.

Scenic vistas in the area include views of the San Gabriel Mountains (located approximately ten miles to the north) and of Downtown Los Angeles (located approximately four miles to the southwest). The implementation of the proposed project will not impact scenic views of the San Gabriel Mountains or Downtown Los Angeles because views of the aforementioned vistas are obstructed by the existing development. These conclusions are supported by the field survey that was conducted for the project.14

Views of Downtown Los Angeles looking west from the residential development located along the east side of Marianna Avenue will remain intact since these units consist of three stories and are situated at a higher elevation than the project site. As a result, no impacts will occur.

B. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? • No Impact.

According to the California Department of Transportation (Caltrans), neither Worth Street nor Marianna Avenue are designated scenic highways.15 The closest scenic highway to the project site is Angeles Crest Highway (SR-2), located 11 miles to the north of the project site. In addition, the vegetation present on-site consists of grass and ornamental species and the project site does not contain any scenic rock outcroppings. As stated previously, the project will require the removal and replacement of all of the street trees located adjacent to the project site along the west side of Marianna Avenue. These trees consist of species most commonly planted as ornamental landscaping and possess minimal scenic value due to their abundance, age, and unmaintained appearance. Lastly, the project site is undeveloped and does not contain any buildings listed in the State or National registrar (refer to

14 Blodgett Baylosis Environmental Planning. Site survey. Survey was conducted on May 17, 2018.
Section 4.5). As a result, no impacts will occur.

C. Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? ● Less than Significant Impact.

The project site is presently undeveloped and is covered over in unmaintained ruderal vegetation. There are mature trees located adjacent to the project site’s eastern property line along the west side of Marianna Avenue. These trees are unmaintained and consist of common ornamental species. The project’s implementation will require the removal and replacement of these street trees with new drought tolerant species, which will improve the appearance of the street and surrounding area. Once constructed, the proposed project will improve the quality of the site by introducing new development characterized by modern architecture, façade treatments, and a neutral color scheme (grey and white walls and blue glazed windows). In addition, the size and mass of the proposed development will be consistent with the other warehouses located in the site’s vicinity. The project’s size and mass is also similar in scale to the nearby multiple-family residential development, which totals three stories in height. As a result, less than significant impacts will occur.

D. Would the project create a new source of substantial light or glare that would adversely affect day- or night-time views in the area? ● Less than Significant Impact.

Exterior lighting can be a nuisance to adjacent land uses that are sensitive to this lighting. This nuisance lighting is referred to as light trespass which is typically defined as the presence of unwanted light on properties located adjacent to the source of lighting. The apartment complex located along the east side of Marianna Avenue is the closest sensitive receptor to the project site.\textsuperscript{16} The predominant source of light impacts will be related to the surface parking lot and building lighting. Glare is related to light trespass and is defined as visual discomfort resulting from high contrast in brightness levels. Glare-related impacts can adversely affect day or nighttime views. As with lighting trespass, glare is of most concern if it would adversely affect sensitive land use or a driver’s vision. The exterior façade would consist of non-reflective materials, such as concrete. In addition, the windows would be comprised of blue reflective glazing, which reduces glare over other transparent surfaces. As a result, no daytime glare-related impacts are anticipated. Nighttime glare and illumination has the potential to result in potentially significant impacts to sensitive receptors. Many sources of light contribute to the ambient nighttime lighting conditions. These sources of nighttime light include street lights, security lighting, wall packs, and vehicular headlights. The outdoor lighting will be controlled by timers. In addition, all lighting must be installed according to these provisions outlined in the City’s Municipal Code:

- \textit{Chapter 9, Article 3, Sec. 93.0117}. No exterior light source may cause more than two foot-candles (21.5 lx) of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

\textsuperscript{16} Blodgett Bayliss Environmental Planning. \textit{Site survey}. Survey was conducted on May 17, 2018.
• Chapter 1, Article 2, Sec. 12.21 A5(k). All lights used to illuminate a parking area shall be designed, located, and arranged so as to reflect the light away from any streets and any adjacent premises.

• Chapter 1, Article 7, Sec. 17.08C. Plans for street lighting system shall be submitted to and approved by the Bureau of Street Lighting.

Adherence to the aforementioned code requirements will ensure potential impacts are kept to levels that are less than significant.

4.1.3 Mitigation Measures

The preceding analysis concluded that the proposed project will not result in potentially significant impacts that would require mitigation.

4.2 Agriculture & Forestry Resources

4.2.1 Thresholds of Significance

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant impact on agriculture and forestry resources if it would:

• 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;

• Conflict with existing zoning for agricultural use, or a Williamson Act contract;

• Conflict with existing zoning for or cause rezoning of, land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?;

• Result in the loss of forest land or conversion of forest land to a non-forest use; or,

• 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.
4.2.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project 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? • No Impact.

According to the California Department of Conservation, the Community of El Sereno does not contain any areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is currently undeveloped. Since the implementation of the proposed project will not involve the conversion of prime farmland, unique farmland, or farmland of statewide importance to urban uses, no impacts will occur.

B. Would the project conflict with existing zoning for agricultural use or a Williamson Act Contract? • No Impact.

The project site is currently zoned MR1-1 (Restricted Industrial). No zone change is required to accommodate the project. Therefore, the project’s implementation will not result in a loss of land zoned for agricultural uses. In addition, according to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract. As a result, no impacts on existing Williamson Act Contracts will result from the proposed project’s implementation.

C. Would the project 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))? • No impact.

The project site is located in the midst of a larger urban area and no forest lands are located within the El Sereno area. According to the City’s municipal code, forest land has a zoning designation of OS (Open Space). As previously mentioned, the project site has a zoning designation of MR1-1 (Restricted Industrial), and does not contain any forest uses. As a result, no impacts on forest land or timber resources will result from the proposed project’s implementation.

D. Would the project result in the loss of forest land or the conversion of forest land to a non-forest use? • No Impact.

No forest lands are located within or in the vicinity of the project site. As a result, no loss or conversion of forest lands to urban uses will result from the proposed project’s implementation and no impacts will occur.

---


18 ZIMAS.

E. Would the project involve other changes in the existing environment that, due to their location or nature, may result in conversion of Farmland to non-agricultural use or the conversion of forest land to a non-forest use? • No Impact.

The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to nonagricultural use or conversion of forest land to non-forest use because the project site is not located in close proximity to farm land or forest land. As a result, no impacts will result from the implementation of the proposed project.

4.2.3 MITIGATION MEASURES

The analysis of agricultural and forestry resources indicated that no impacts on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

4.3 AIR QUALITY

4.3.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse environmental impact on air quality, if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations; or,  
- Create objectionable odors affecting a substantial number of people.

The South Coast Air Quality Management District (SCAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the following criteria pollutants:

- Ozone (O₃) is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
Carbon monoxide (CO) is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust.

Nitrogen dioxide (NO₂) is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO₂ is formed when nitric oxide (a pollutant from burning processes) combines with oxygen.

Sulfur dioxide (SO₂) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.

PM₁₀ and PM₂.₅ refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation.

Projects in the South Coast Air Basin (Basin) generating construction-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day of reactive organic compounds;
- 100 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM₂.₅; or,
- 150 pounds per day of sulfur oxides.

A project would have a significant effect on air quality if any of the following operational emissions thresholds for criteria pollutants are exceeded:

- 55 pounds per day of reactive organic compounds;
- 55 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM₂.₅; or,
- 150 pounds per day of sulfur oxides.²⁰

4.3.2 Analysis of Environmental Impacts

A. Would the project conflict with or obstruct the implementation of the applicable air quality plan?

- No Impact.

The project area is located within the South Coast Air Basin (Basin), which covers a 6,600 square-mile area within Los Angeles, the non-desert portions of Los Angeles County, Riverside County, and San

Bernardino County. Measures to improve regional air quality are outlined in the SCAQMD’s Air Quality Management Plan (AQMP). The most recent AQMP was adopted in 2017 and was jointly prepared with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG).\(^{21}\) The AQMP will help the SCAQMD maintain focus on the air quality impacts of major projects associated with goods movement, land use, energy efficiency, and other key areas of growth. Key elements of the 2016 AQMP include enhancements to existing programs to meet the 24-hour PM\(_{2.5}\) Federal health standard and a proposed plan of action to reduce ground-level ozone. The primary criteria pollutants that remain non-attainment in the local area include PM\(_{2.5}\) and ozone. Specific criteria for determining a project’s conformity with the AQMP is defined in Section 12.3 of the SCAQMD’s CEQA Air Quality Handbook. The AQMP refers to the following objectives: 1. Eliminating reliance on unknown future technology measures to demonstrate future attainment of air quality standards; 2 calculating and accounting for co-benefits associated with measures identified in other, approved planning efforts (e.g., SCAB RTP/SCS); 3 Developing a strategy with fair-share emission reductions at the federal, state, and local levels; 4 Investing in strategies and technologies that meet multiple objectives regarding air quality, climate change, air toxic exposure, energy, and transportation – especially in disadvantaged communities; 5 Seeking, identifying, and securing significant sources of funding for incentives to implement early deployment and commercialization of zero and near-zero technologies, particularly in the mobile source sector; 6 Enhancing the socioeconomic analysis and selecting the most efficient and cost-effective path to achieve multi-pollutant and -deadline targets; 7 And prioritizing non-regulatory, innovative approaches that can contribute to the economic vitality of the regional while maximizing emission reductions.\(^{22}\)

The proposed project’s long-term (operational) airborne emissions will be below levels that the SCAQMD considers to be a significant impact (refer to the analysis included in the next section where the long-term stationary and mobile emissions for the proposed project are summarized in Table 4-3). In addition, the project will not significantly affect any regional population, housing, and employment projections prepared for the City of Los Angeles. Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the AQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the AQMP.

Furthermore, the proposed project will not conflict with the regional population forecast and distribution in the 2016 AQMP. According to the 2016 AQMP, the Basin had a population of 16.4 million in 2012 and is projected to have a population of 17.6 million by the year 2023 (these numbers are derived from the 2016-2040 RTP/SCS prepared by SCAG). City-specific growth forecasts are listed within the RTP/SCS. According to the RTP/SCS Demographics and Growth Forecast Appendix, the City of Los Angeles is expected to add approximately 472,700 new jobs through the year 2040.\(^{23}\) The proposed project will result in 32 new jobs.\(^{24}\) The projected number of new jobs is well within SCAG’s

---


\(^{22}\) Ibid.


\(^{24}\) Email communication with Mr. Ken Jackson, the project Applicant and CEO of Camfield Partners. Email dated May 29, 2018.
employment projections for the City of Los Angeles and the proposed project will not violate the AQMP. As a result, no impacts related to the implementation of the AQMP are anticipated.

B. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation? • Less than Significant Impact.

The entire construction period for the proposed project is expected to last for approximately 13 months (refer to Section 2.7) and would include the grading of the site, site preparation, construction of the warehouse and installation of the new water line, and the finishing of the project (pavement areas, painting, and planting of landscaping). The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2016.3.2). The assumptions regarding the construction phases and the length of construction followed those identified herein in Section 2.7. As shown in Table 4-2, daily construction emissions are not anticipated to exceed the SCAQMD’s significance thresholds.

<table>
<thead>
<tr>
<th>Construction Phase</th>
<th>ROG</th>
<th>NOₓ</th>
<th>CO</th>
<th>SO₂</th>
<th>PM₁₀</th>
<th>PM₂.₅</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Preparation (on-site)</td>
<td>1.71</td>
<td>19.48</td>
<td>7.88</td>
<td>0.01</td>
<td>2.95</td>
<td>1.94</td>
</tr>
<tr>
<td>Site Preparation (off-site)</td>
<td>0.03</td>
<td>0.02</td>
<td>0.35</td>
<td>--</td>
<td>0.09</td>
<td>0.02</td>
</tr>
<tr>
<td><strong>Total Site Preparation</strong></td>
<td>1.74</td>
<td>19.50</td>
<td>8.23</td>
<td>0.01</td>
<td>3.04</td>
<td>1.96</td>
</tr>
<tr>
<td>Grading (on-site)</td>
<td>1.41</td>
<td>16.03</td>
<td>6.60</td>
<td>0.01</td>
<td>2.50</td>
<td>1.64</td>
</tr>
<tr>
<td>Grading (off-site)</td>
<td>0.03</td>
<td>0.02</td>
<td>0.35</td>
<td>--</td>
<td>0.09</td>
<td>0.02</td>
</tr>
<tr>
<td><strong>Total Grading</strong></td>
<td>1.44</td>
<td>16.05</td>
<td>6.95</td>
<td>0.01</td>
<td>2.59</td>
<td>1.66</td>
</tr>
<tr>
<td>Building Construction (on-site)</td>
<td>2.27</td>
<td>15.98</td>
<td>13.48</td>
<td>0.02</td>
<td>0.91</td>
<td>0.88</td>
</tr>
<tr>
<td>Building Construction (off-site)</td>
<td>0.19</td>
<td>1.47</td>
<td>1.67</td>
<td>--</td>
<td>0.42</td>
<td>0.12</td>
</tr>
<tr>
<td><strong>Total Building Construction</strong></td>
<td>2.46</td>
<td>17.45</td>
<td>15.15</td>
<td>0.02</td>
<td>1.33</td>
<td>1.00</td>
</tr>
<tr>
<td>Paving</td>
<td>0.90</td>
<td>9.17</td>
<td>8.90</td>
<td>0.01</td>
<td>0.52</td>
<td>0.48</td>
</tr>
<tr>
<td>Paving</td>
<td>0.06</td>
<td>0.04</td>
<td>0.58</td>
<td>--</td>
<td>0.14</td>
<td>0.03</td>
</tr>
<tr>
<td><strong>Total Paving</strong></td>
<td>0.96</td>
<td>9.21</td>
<td>9.48</td>
<td>0.01</td>
<td>0.66</td>
<td>0.51</td>
</tr>
<tr>
<td>Architectural Coatings (on-site)</td>
<td>15.84</td>
<td>1.83</td>
<td>1.84</td>
<td>--</td>
<td>0.12</td>
<td>0.12</td>
</tr>
<tr>
<td>Architectural Coatings (off-site)</td>
<td>0.02</td>
<td>0.02</td>
<td>0.26</td>
<td>--</td>
<td>0.06</td>
<td>0.01</td>
</tr>
<tr>
<td><strong>Total Architectural Coatings</strong></td>
<td>15.86</td>
<td>1.85</td>
<td>2.10</td>
<td>--</td>
<td>0.18</td>
<td>0.13</td>
</tr>
<tr>
<td>Maximum Daily Emissions</td>
<td>15.87</td>
<td>19.50</td>
<td>15.16</td>
<td>0.02</td>
<td>3.04</td>
<td>1.96</td>
</tr>
<tr>
<td>Daily Thresholds</td>
<td>75</td>
<td>100</td>
<td>550</td>
<td>150</td>
<td>150</td>
<td>55</td>
</tr>
</tbody>
</table>

Source: CalEEMod 2016.3.2.

As indicated previously, the project area is located in a non-attainment area for ozone and particulates, therefore, the proposed project will be required to comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Best Available Control Measures (BACM) for all fugitive dust sources, and the 2016 Air Quality Management Plan (AQMP), which identifies BACMs and Best Available Control Technologies (BACT) for area sources and point sources, respectively. According to SCAQMD Rule 403, Fugitive Dust, all unpaved demolition and construction areas shall be regularly watered up to three times per day during excavation, grading, and construction as required.
Watering could reduce fugitive dust by as much as 55 percent. Rule 403 also requires that temporary dust covers be used on any piles of excavated or imported earth to reduce wind-blown dust. In addition, all clearing, earthmoving, or excavation activities must be discontinued during periods of high winds (i.e. greater than 15 mph), so as to prevent excessive amounts of fugitive dust. Finally, the contractors must comply with other SCAQMD regulations governing equipment idling and emissions controls. The aforementioned SCAQMD regulations are standard conditions required for every construction project undertaken in the City as well as in the cities and counties governed by the SCAQMD. The extension of the water line will result in minimal construction emissions. The installation will require the removal of asphalt, trenching, and the use of a crane to lower the pipe into the trench.

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts will continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area emissions related to cleaning products and landscaping equipment. Table 4-3 depicts the estimated project operational emissions related to the project’s operation.

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>ROG</th>
<th>NOₓ</th>
<th>CO</th>
<th>SO₂</th>
<th>PM₁₀</th>
<th>PM₂.₅</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area-wide (lbs/day)</td>
<td>1.61</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Energy (lbs/day)</td>
<td>--</td>
<td>0.02</td>
<td>0.01</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Mobile (lbs/day)</td>
<td>0.25</td>
<td>1.31</td>
<td>3.71</td>
<td>0.01</td>
<td>1.11</td>
<td>0.30</td>
</tr>
<tr>
<td>Total (lbs/day)</td>
<td>1.86</td>
<td>1.33</td>
<td>3.74</td>
<td>0.01</td>
<td>1.11</td>
<td>0.30</td>
</tr>
<tr>
<td>Daily Thresholds</td>
<td>55</td>
<td>55</td>
<td>550</td>
<td>150</td>
<td>150</td>
<td>55</td>
</tr>
<tr>
<td>Significant Impact?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

Source: CalEEMod 2016.3.2.

As indicated in Table 4-3, the projected long-term emissions are below thresholds considered to represent a significant impact.

C. Would the project 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? • Less than Significant Impact.

As indicated in Table 4-2 and 4-3, the project’s construction and operational emissions will be below the thresholds of significance established by the AQMD. In addition, the proposed project is classified as an infill development, which is seen as an important strategy for reducing GHG and criteria pollutant emissions by diminishing the amount of vehicle miles traveled between home-to-work trips. As a result, the potential impacts are considered to be less than significant.
D. Would the project expose sensitive receptors to substantial pollutant concentrations? • Less than Significant Impact with Mitigation.

Most vehicles generate carbon monoxide (CO) as part of the tail-pipe emissions and high concentrations of CO along busy roadways and congested intersections are a concern. The areas surrounding the most congested intersections are often found to contain high levels of CO that exceed applicable standards and are referred to as hot-spots. Three variables influence the creation of a CO hot-spot: traffic volumes, traffic congestion, and the background CO concentrations for the source receptor area. Typically, a CO hot-spot may occur near a street intersection that is experiencing severe congestion (a LOS E or LOS F) where idling vehicles result in ground level concentrations of carbon monoxide. However, within the last decade, decreasing background levels of pollutant concentrations and more effective vehicle emission controls have significantly reduced the potential for the creation of hot-spots. The SCAQMD stated in its CEQA Handbook that a CO hot-spot would not likely develop at an intersection operating at LOS C or better. Since the Handbook was written, there have been new CO emissions controls added to vehicles and reformulated fuels are now sold in the SCAB. These new automobile emissions controls, along with the reformulated fuels, have resulted in a lowering of both ambient CO concentrations and vehicle emissions.

It is estimated that the project will generate approximately 67 daily trips, seven trips of which will occur during the morning peak hour and seven trips of which will occur during the evening peak hour. As indicated in Section 4.16.2.A, the project generated less than 50 peak hour trips at the study intersections and project trips did not result in a significant impact at the study intersections. Since the project will not result in a degradation of any other study intersection’s level of service, the likelihood of a CO hot-spot developing at this intersection is considered remote. Therefore, the project’s impacts would be less than significant with respect to CO hot-spots.

The proposed project will include up to three truck doors located on the south side of the building. The southeast portion of the building will extend 87 feet beyond the dock doors, thereby screening the loading areas from the public right-of-way. Additionally, these loading areas will be located at least 150 feet west of the site’s eastern property line, and 236 feet west of the existing multiple-family residential units located along Marianna Avenue. It is important to note that a limited number of trucks will be travelling to the site. Up to three small trucks will visit the site per day, while up to two to three large trucks will visit the site on a weekly basis.

The majority of the two to three diesel trucks travelling to and from the site on a weekly basis will be employing clean diesel technology to reduce diesel particulates. The U.S. trucking fleet is transitioning to newer clean diesel technology which translates into fuel savings, lower greenhouse gas emissions, and a reduction in diesel particulate emissions. This newest generation of clean diesel trucks will have NOx emissions that are 99 percent lower than previous generations of larger trucks along with 98 percent fewer diesel particulate emissions, resulting in significant clean air benefits. Beginning in 2011, all heavy-duty diesel trucks sold had to meet NOx emissions of no more than 0.20 grams per brake horsepower hour (g/BHP-hr.). This is in addition to particulate emissions levels of no more than 0.01 g/HP-hr. established in 2007. The new more restrictive emissions requirements, together with the
SCAQMD’s regulations limiting truck idling times will mitigate potential impacts related to truck diesel emissions.

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality and typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate. These population groups are generally more sensitive to poor air quality. The closest sensitive receptors to the project site include the apartment complex located along the east side of Marianna Avenue, opposite the project site (refer to Exhibit 4-1). The SCAQMD requires that CEQA air quality analyses indicate whether a proposed project will result in an exceedance of localized emissions thresholds or LSTs. LSTs apply to long-term (operational) emissions at a fixed location and do not include off-site or area-wide emissions. The pollutants that are the focus of the LST analysis include the conversion of NOₓ to NO₂; carbon monoxide (CO) emissions from construction; PM₁₀ emissions from construction; and PM₂.₅ emissions from construction. For purposes of the LST analysis, the receptor distance used was 25 meters. The project’s LST emissions are presented in Table 4-4.

<table>
<thead>
<tr>
<th>Emissions</th>
<th>Emissions (lbs/day)</th>
<th>Type</th>
<th>Allowable Emissions Threshold (lbs/day) and a Specified Distance from Receptor (in meters)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOₓ</td>
<td>19.50</td>
<td>Construction</td>
<td>221  212  226  250  312</td>
</tr>
<tr>
<td>CO</td>
<td>15.16</td>
<td>Construction</td>
<td>1,531  1,985  2,762  4,383  10,467</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>3.04*</td>
<td>Construction</td>
<td>13  40  55  84  174</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>1.96*</td>
<td>Construction</td>
<td>6  8  14  29  95</td>
</tr>
</tbody>
</table>

Source: CalEEMod Version 2016.3.2.
* = Note: These figures take into account the watering of the site up to three times per day, which is a standard condition required by the SCAQMD.

The emissions generated by the construction of the proposed project will not exceed the LSTs identified above and thus the impacts on exposure of sensitive receptors will be less than significant. Further analysis of the CalEEMod worksheets indicated that the primary source of construction PM emissions is fugitive dust. Adherence to additional mandatory Rule 403 regulations will reduce fugitive dust emissions to levels that are less than significant. Rule 403 regulations consist of best management practices such as watering the site three times per day, rinsing trucks prior to egress, and covering stockpiles of soil. These best management practices are required by the SCAQMD for every discretionary project in the SCAB. Enforcement of these standard conditions falls under the jurisdiction of the SCAQMD. In order to facilitate better communication between the local residents and the SCAQMD, the following mitigation is required:

- The project Applicant must obtain a sign from the SCAQMD identifying the number local residents can call to file a complaint regarding fugitive dust emissions. This sign must be

---

placed along the east side of the project site and must remain posted for the duration of the construction period.

The construction period is projected to last for approximately 13 months. The majority of the construction equipment, if not all, will be diesel powered. This equipment, in turn, will generate diesel particulate (DPMs) emissions. Because of the presence of sensitive receptors in relatively close proximity to the grading and excavation activity areas, the quantification of DPMs was undertaken to ascertain the potential DPM generation from these grading activities. For purposes of analysis, the grading and site preparation phase would include the following equipment use: one water truck, ten dump trucks, two graders, two loaders, and one bull dozer. The analysis assumed that the equipment would operate 8-hours per day.

The SCAQMD’s Tier 2 Screening Risk Assessment Report (Procedure Version 8.1 [Package N, September 1, 2017-Risk Tool V. 1.1]) was model was used to estimate the potential health risk from DPM emissions. According to the SCAQMD’s screening model, the project “passed” the cancer risk threshold (refer to Exhibit 4-2). Essentially, the cancer risk stemming from the project’s construction will be less than one in 10 million.

The majority of the diesel trucks travelling to and from the site and the diesel construction equipment will be employing clean diesel technology to reduce diesel particulates. In 2004, the EPA challenged diesel engine and equipment makers to virtually eliminate emissions from a wide range of diesel engines used in construction, farm and industrial off-road applications. Beginning in 2008, manufacturers responded with increasingly low-emissions technology leading up to the 2014 Tier 4 Final standards. The Tier 4 Final emission standards resulted in a 90 percent reduction in PM and 50 percent reduction in NOx emissions. This Tier 4 technology applied to a variety of diesel construction equipment including wheel loaders, backhoes, excavators, and bulldozers. The new more restrictive emissions requirements, together with the SCAQMD’s regulations limiting truck idling times will mitigate potential impacts related to truck diesel emissions. The computer model is provided in Appendix A.

Adherence to the abovementioned mitigation calling for the identification of an SCAQMD regulator on a posted sign will reduce potential impacts to levels that are less than significant.

E. Would the project create objectionable odors affecting a substantial number of people?  ● Less than Significant Impact.

The SCAQMD has identified those land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering facilities, food processing plants, chemical plants, composting activities, refineries, landfills, and businesses involved in fiberglass molding.26

The project is a proposal to construct and operate an evidence collection warehouse. Various forms of evidence will be collected, stored, and processed on-site including biological evidence. The biological evidence will not produce odors that would affect the nearby sensitive receptors.

EXHIBIT 4-1
SENSITIVE RECEPTORS MAP
SOURCE: QUANTUM GIS
EXHIBIT 4-2
HEALTH RISK SCREENING RESULTS
SOURCE: SCAQMD
Biological evidence will be processed and analyzed in the break down room. From there, the evidence will either be discarded in the bio-hazard disposal bin or stored away in the freezer room. Biological evidence will not leave the warehouse unless it is properly contained pursuant to existing generally applicable regulations for the handling such evidence. All odors will be contained within the special bio-hazard bins or the freezer room and will not be detectable from the nearby residential units. The evidence employees will be required to adhere to all Division of Occupational Safety and Health, Fire Department, Department of Public Health, and Department of Toxic Substances Control requirements. Furthermore, Material Safety Data Sheet compliant chemical lockers will be included. Since all of the biological evidence will be properly stored and disposed of, the operational impacts are considered to be less than significant.

Truck drivers must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel powered vehicles to less than five minutes.\(^{27}\) Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. In addition, the project’s contractors must adhere to SCAQMD Rule 403 regulations, which significantly reduce the generation of fugitive dust. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations are required for all development proposed in the City. No additional mitigation beyond adherence to mandatory standard conditions will be required. As a result, less than significant impacts will occur.

### 4.3.3 Mitigation Measures

The analysis of air quality impacts indicated that the proposed project will not result in significant air quality impacts with the implementation of the following mitigation:

*Mitigation Measure No. 1 (Air Quality).* The project Applicant must obtain a sign from the SCAQMD identifying the number local residents can call to file a complaint regarding fugitive dust emissions. This sign must be placed along the east side of the project site and must remain posted for the duration of the construction period.

### 4.4 Biological Resources

#### 4.4.1 Thresholds of Significance

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on biological resources if it would:

- 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, or U. S. Fish and Wildlife Service;

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of 

\(^{27}\) California, State of. *California Code of Regulations, Title 13, Section 2485 Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.*
Fish and Wildlife or U.S. Fish and Wildlife Service;

- Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites;

- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or,

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

### 4.4.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project 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, or U. S. Fish and Wildlife Service? • No Impact.*

A review of the California Department of Fish and Wildlife California Natural Biodiversity Database (CNDDB) Bios Viewer indicated that out of a total of 34 native plant and animal species, there are five threatened or endangered species located within the Los Angeles Quadrangle (which includes El Sereno). These species include:

- **California red-legged frog**: The California red-legged frog is federally listed as a threatened species. This species is found primarily in coastal drainages of central California, from Marin County, California, south to northern Baja California, Mexico. As of 2011, the only known population in Los Angeles County is in San Francisquito Canyon on the Angeles National Forest. The California red-legged frog requires a variety of habitat elements with aquatic breeding areas embedded within a matrix of riparian and upland dispersal habitats (dense forest vegetation). Breeding site of the California red-legged frog are in aquatic habitats including pools and backwaters within streams and creeks, ponds, marshes, springs, and other small bodies of water.\(^{28}\) Due to the project site’s location and lack of suitable habitat, the California red-legged frog is not likely to be found on-site.

- **Coastal California gnatcatcher**: The coastal California gnatcatcher is federally listed as a threatened bird species. The coastal California gnatcatcher is a small blue-gray songbird which measures approximately 4.5 inches. This species is known or believed to occur along southern California coast area and Baja California. The coastal California gnatcatcher can be found in

areas with coastal sage scrub and in habitats of low shrubs (three to six feet tall), generally dominated by California sagebrush, buckwheat, salvia, and prickly-pear cactus. Due to the project site’s location and lack of suitable habitat, the coastal California gnatcatcher is not likely to be found on-site.

- **Southwestern willow flycatcher**: The southwestern willow flycatcher is federally listed and State-listed as an endangered bird species. This bird species is small; usually a little less than six inches in length, and has conspicuous light-colored wingbars. This species is known or believed to occur in Southwestern US. Southwestern willow flycatchers require moist microclimatic and vegetative conditions, and breed only in dense riparian vegetation near surface water or saturated soil. Due to the project site’s location and lack of suitable habitat, the southwestern willow flycatcher is not likely to be found on-site.

- **Least Bell’s vireo**: The least Bell’s vireo is federally listed and State-listed as an endangered bird species. Least Bell's vireos are small birds, approximately 4.5 to 5.0 inches long. They have short rounded wings and short, straight bills. Feathers are mostly gray above and pale below. This species is known or believed to occur along California coast. Highly territorial, least Bell’s vireos establish breeding territories, ranging in size from one to four acres. Nesting habitat typically consists of well-developed overstories and understories and low densities of aquatic and herbaceous cover. Due to the project site’s location and lack of suitable habitat, the least Bell’s vireo is not likely to be found on-site.

- **Bank Swallow**: The bank swallow populations located in Southern California are extinct.

The proposed project will not have an impact on the aforementioned species since there is no suitable riparian or native habitat located within, or in the vicinity of, the project site. These species typically require wetland or riparian habitat with native vegetation and access to bodies of water.

An additional search was conducted using the California Native Plant Society’s Inventory of Rare and Endangered Plants to ascertain any rare or endangered plant species which may occur in the Los Angeles Quadrangle. The search yielded five results. The following five plants have been identified in the Los Angeles Quadrangle: Davidson’s saltscale; Los Angeles sunflower; mesa horkelia; prostrate

---


vernal pool navarretia; and Greate’s aster.\textsuperscript{33} None of these plants were encountered during the site survey. As indicated previously, the only vegetation that is present on-site consists of ruderal species typically found in an urban environment. As a result, no impacts on any candidate, sensitive, or special status species will result.

\textbf{B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?} \textbullet \textit{No Impact.}

The field survey that was conducted for this project indicated that there are no wetlands or riparian habitats present on-site or in the surrounding areas. This conclusion is also supported by a review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper.\textsuperscript{34} In addition, there are no designated “blue line streams” located within the project site. As a result, no impacts on natural or riparian habitats will result from the proposed project.

\textbf{C. Would the project have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?} \textbullet \textit{No Impact.}

As indicated in the previous subsection, the project site and adjacent developed properties do not contain any natural wetland and/or riparian habitat.\textsuperscript{35} As a result, the proposed project will not impact any protected wetland area or designated blue-line stream and no impacts will occur.

\textbf{D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?} \textbullet \textit{No Impact.}

The site is surrounded by development and lacks suitable habitat for wildlife habitat.\textsuperscript{36} Furthermore, the site contains no natural hydrological features. Constant disturbance (noise and vibration) from vehicles travelling on the adjacent roadways limit the site’s utility as a migration corridor. Since the site is surrounded by development on all sides and lacks suitable habitat, the site’s utility as a migration corridor is restricted. Therefore, no impacts will result from the implementation of the proposed project.

\textsuperscript{33} California Native Plant Society, Rare Plant Program. 2018. \textit{Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39)}. Website http://www.rareplants.cnps.org [accessed 11 May 2018]

\textsuperscript{34} United States Fish and Wildlife Service. \textit{National Wetlands Inventory}. https://www.fws.gov/Wetlands/data/Mapper.html.

\textsuperscript{35} Ibid.

\textsuperscript{36} Blodgett Baylosis Environmental Planning. \textit{Site survey}. Survey was conducted on May 17, 2018.
E. **Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?** • **Less than Significant Impact with Mitigation.**

Chapter IV (Public Welfare), Article 6 (Preservation of Protected Trees) of the City of Los Angeles municipal code serves to protect Southern California native tree species. The City’s municipal code states:

“‘Protected tree’ means any of the following Southern California native tree species which measures four inches or more in cumulative diameter, four and one half feet above the ground level at the base of the tree:

- Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*).

- Southern California Black Walnut (*Juglans californica var. californica*).

- Western Sycamore (*Platanus racemosa*).

- California Bay (*Umbellularia californica*).

This definition shall not include any tree grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program.”

There are multiple mature trees located along the Marianna Avenue right-of-way. All of the trees are of the same species (eucalyptus trees), which are not a protected species. These street trees will be removed and replaced to accommodate the proposed project. Even though these trees are not “protected trees,” their removal is contingent upon the attainment of a Tree Removal Permit and the trees will be replaced following the construction of the facilities during the landscaping and finishing phase, pursuant to conditions in said permit. The removal of the existing eucalyptus trees is not considered to be a significant impact that requires further mitigation because the project Applicant will replace these trees on a 2 to 1 ratio pursuant to the conditions outlined in the Permit. Furthermore, these trees will consist of drought tolerant species.

The removal of these trees may have the potential to impact nesting species that may reside within their canopy. To ensure that the potential tree removal does not adversely impact any avian species living in the trees, the following mitigation is required.

- If clearing and/or construction activities would occur during the raptor or migratory bird nesting season (February 15 to August 15), the Applicant and/or its contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before the construction activities commence. The qualified biologist shall survey the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season. If active nest(s) are identified during the preconstruction

---

survey, a qualified biologist shall establish a 100-foot no-activity setback for migratory bird nests and a 250-foot setback for raptor nests. No ground disturbance should occur within the no-activity setback until the nest is deemed inactive by the qualified biologist.

The above mitigation would reduce the impact to levels that are less than significant by ensuring there are no nesting birds present on-site should construction commence between the months of February and August.

F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? • No Impact.

The proposed project will not impact an adopted or approved local, regional, or State habitat conservation plan because the proposed project is located in the midst of an urban area. The project site is not governed by a Natural Community Conservation Plan. Moreover, the closest Significant Ecological Area (SEA) to the project site is the Verdugo Mountains Significant Ecological Area (SEA #40), located approximately nine miles northwest from the project site. The construction and operation of the proposed project will not affect the Verdugo Mountains SEA.

The Los Angeles River is currently the focus of a revitalization effort lead by the City of Los Angeles. The City of Los Angeles intends to focus on the 32-mile portion of the river that flows from Owensmouth Avenue, located in the San Fernando Valley, to the northern border of the City of Vernon. The project site is located 2.60 miles east of the Los Angeles River and the project’s construction and subsequent operation will not affect efforts to revitalize the Los Angeles River. Therefore, no impacts will occur.

4.4.3 MITIGATION MEASURES

The analysis of biological resources impacts indicated that the proposed project may have the potential to impact nesting avian species. The project’s implementation will require the removal of the mature street trees located adjacent to the project site’s eastern property line along the west side of Marianna Avenue. Avian species may be present within these trees during the migratory bird nesting season. Therefore, the following mitigation is required:

Mitigation Measure No. 2 (Biological Resources). If clearing and/or construction activities would occur during the raptor or migratory bird nesting season (February 15 to August 15), the Applicant and/or its contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before the construction activities commence. The qualified biologist shall survey the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season. If active nest(s) are


identified during the preconstruction survey, a qualified biologist shall establish a 100-foot no-activity setback for migratory bird nests and a 250-foot setback for raptor nests. No ground disturbance should occur within the no-activity setback until the nest is deemed inactive by the qualified biologist.

### 4.5 CULTURAL RESOURCES

#### 4.5.1 Thresholds of Significance

According to the City of Los Angeles, acting as Lead Agency, a project may have a significant adverse impact on cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or,
- Disturb any human remains, including those interred outside of formal cemeteries.

#### 4.5.2 Analysis of Environmental Impacts

A. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? • No Impact.

The implementation of the proposed project will not affect a historic structure. As indicated previously, the site is currently undeveloped, though it was previously occupied by Castrol, Inc., a manufacturer of lubricants. Operations ceased in 1995 and since then, all of the structures located on-site were razed.\(^{40}\) Therefore, the project will not affect any historic structure since the site is barren and undeveloped. A search through the California Office of Historic Preservation, California Historical Resources database indicated that the project site does not contain any historic structures listed in the National or California Registrar.\(^{41}\) In addition, the City of Los Angeles maintains a Historic-Cultural Monument List, which includes 1,104 City designated historic resources. The project site is not identified on the list of City designated historic resources.\(^{42}\) Since the project will not affect any local, state, or federally designated historic structure, no impacts will occur.

---


\(^{41}\) California Office of Historic Preservation. California Historical Resources. [http://ohp.parks.ca.gov/ ListedResources/?view=county&criteria=30](http://ohp.parks.ca.gov/ ListedResources/?view=county&criteria=30)

\(^{42}\) City of Los Angeles Office of Historic Resources. Historic-Cultural Monument List. [http://preservation.lacity.org/sites/default/files/HCMDatabase%23021916.pdf](http://preservation.lacity.org/sites/default/files/HCMDatabase%23021916.pdf)
B. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?* Less than Significant Impact.

The greater Los Angeles Basin was previously inhabited by the Gabrieleño-people, named after the San Gabriel Mission. The Gabrieleño tribe has lived in this region for around 7,000 years. Prior to Spanish contact, approximately 5,000 Gabrieleño people lived in villages throughout the Los Angeles Basin. The project site is currently undeveloped, though the site has been extensively disturbed as a result of past remediation efforts. In the unlikely event that remains are uncovered by construction crews, all excavation and grading activities shall be halted and the Los Angeles County Sheriff will be contacted (the Department will then contact the County Coroner). This is a standard condition under California Health and Safety Code Section 7050.5(b), which states:

“In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.”

In addition, Title 14; Chapter 3; Article 5; Section 15064.5 of the State CEQA Guidelines will apply in terms of the identification of significant archaeological resources and their salvage. According to Section 15064.5:

In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps should be taken:

- There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

- The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and,

---


● If the coroner determines the remains to be Native American:
  
  ● The coroner shall contact the Native American Heritage Commission within 24 hours.
  
  ● The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
  
  ● The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98; or,
  
  ● Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.
  
  ● The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.
  
  ● The descendant identified fails to make a recommendation; or,
  
  ● The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Adherence to the abovementioned standard conditions is mandatory for all development proposed in the City. No mitigation is required since these conditions provide specific instructions to address any possible scenario that may arise during the project’s construction phase. As a result, the potential impacts are considered to be less than significant.

C. Would the project disturb any human remains, including those interred outside of formal cemeteries? • No Impact.

There are no cemeteries located in the immediate area of the project site. The closest cemetery to the project site is Forest Lawn Memorial Park, located approximately 5.50 miles to the northwest along Glendale Avenue in the City of Glendale.\textsuperscript{45} The proposed project will be restricted to the designated project site and will not affect the aforementioned cemetery. In addition, it is highly unlikely that any human remains will be encountered during the construction of the proposed project due to the level of disturbance that has occurred in order to accommodate the previous development. However, in the unlikely event that remains are uncovered by construction crews and/or the Native American Monitors, all excavation/grading activities shall be halted and the Los Angeles Police Department will be contacted (the Department will then contact the County Coroner). This is a standard condition

\textsuperscript{45} Google Earth. Website accessed May 29, 2018.
under California Health and Safety Code Section 7050.5(b). As a result, the proposed construction activities are not anticipated to impact any interred human remains.

D. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ● Less than Significant Impact.

The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. Rocks are classified into three principal types: igneous, metamorphic, and sedimentary. Sedimentary rocks contain the bulk of fossils in the City, although metamorphic rocks may also contain fossils. Igneous rocks do not contain fossils. In addition to igneous and most metamorphic rocks, areas of artificial landfill, streambeds, and beach sand do not contain fossils. The older sedimentary rocks are exposed in the hills and mountains, while younger rock units are present in low-lying and flat valley and basin floors. The majority of igneous rocks in the region are found in the Santa Monica Mountains and the northern San Fernando Valley. Within the City of Los Angeles, metamorphic rocks are found mostly in the Santa Monica Mountains and within scattered exposures around the region.

Direct destruction of fossils within fossil-bearing rock units may result from grading or excavation associated with a project, particularly during the construction phase. Indirect destruction or loss of fossils exposed at the surface may result from increased erosion, human access, or other activity in a project area. Increased access could result from the opening of private or otherwise closed lands, new access routes through sensitive areas, or through excavation or the removal of vegetation.

The site in its current state slopes downward approximately 15 feet from northeast to southwest. The site will be leveled during construction, which will require both the import of new fill within the areas of the site that are situated at a lower elevation, and the removal of the underlying soils within the portions of the site that are situated at a greater elevation. As stated in Section 4.6, up to 65 percent of the underlying soils consist of artificial fill. For this reason, the likelihood of discovering near surface paleontological resources is considered remote. In addition, grading activities are not likely to extend below 15 feet below ground surface. As a result, the potential impacts are considered to be less than significant.

4.5.3 MITIGATION MEASURES

The analysis of potential cultural resources impacts indicated that no significant impacts would result from the proposed project’s implementation. As a result, no mitigation is required.
4.6 GEOLOGY & SOILS

4.6.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant impact on the environment if it would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: 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. Strong seismic ground-shaking? Seismic-related ground failure, including liquefaction? Landslides;

- Result in substantial soil erosion or the loss of topsoil;

- 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;

- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property; or,

- 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.

4.6.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: 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. Strong seismic ground-shaking? Seismic-related ground failure, including liquefaction? Landslides? • Less than Significant Impact.

The City of Los Angeles is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake.46 The Alquist-Priolo Earthquake Fault Zoning Act’s main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.47 A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State’s Department of Conservation website. According to the State Department of Conservation, the

46 California Department of Conservation. What is the Alquist-Priolo Act http://www.conservation.ca.gov

47 Ibid.
City of Los Angeles is on the list.\textsuperscript{48} The Raymond Fault is the closest Alquist Priolo fault trace to the site.\textsuperscript{49} This fault trace is located 3.5 miles north of the project site.\textsuperscript{50}

The potential impacts from fault rupture are considered no greater for the project site than for the surrounding areas. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The proposed warehouse will be constructed in compliance with the 2016 Building Code, which contains standards for building design to minimize the impacts from fault rupture. Therefore, the potential impacts resulting from fault rupture are anticipated to be less than significant. The potential impacts in regards to ground shaking would also be considered to be less than significant. The intensity of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The proposed warehouse will be constructed in compliance with the 2016 Building Code, which contains standards for building design to minimize the impacts from ground shaking.

Other potential seismic issues include ground failure, liquefaction, and lateral spreading. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is located in an area that is subject to liquefaction (refer to Exhibit 4-3). According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. Essentially, liquefaction is the process by which the ground soil loses strength due to an increase in water pressure following seismic activity. The potential impacts in regards to liquefaction are considered to be less than significant since the warehouse building will be constructed according to the 2016 Building Code.

In addition, the site slopes downward in a southwesterly direction. The change in elevation from the northwest corner to the southwest corner is up to 15 feet. The project Applicant will rebalance the site by introducing denser fill that will be capable of supporting the new warehouse. The amount of fill that will be imported and exported off-site is not yet known. Reinforced steel support beams may be installed within the concrete slab foundation to prevent collapse. Nevertheless, the addition of new fill will reduce the site’s liquefaction risk and no mitigation is required.

Lastly, the project site is not subject to the risk of landslides.\textsuperscript{51} Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading will not affect the proposed project since the project will be constructed according to the most recent building code. Furthermore, the Applicant will rebalance the site with fill capable of supporting the development. Therefore, lateral spreading caused by liquefaction would not affect the project. The underlying soils may be prone to shrinking and swelling (refer to Section 4.6.2.D); however, these soils will be removed and replaced. As a result, the potential impacts in regards to liquefaction and landslides are less than significant.

\textsuperscript{48} California Department of Conservation. Table 4, Cities and Counties Affected by Alquist-Priolo Earthquake Fault Zones as of January 2010. \url{http://www.conservation.ca.gov/cgs/rghm/ap/Pages/affected.aspx}

\textsuperscript{49} GIS Shapefile layer provided by the California State Department of Conservation.

\textsuperscript{50} Ibid.

\textsuperscript{51} ZIMAS. The City’s ZIMAS program indicates that the site is not located within a landslide zone.
EXHIBIT 4-3
SEISMIC HAZARDS MAP
SOURCE: QUANTUM GIS
B. Would the project result in substantial soil erosion or the loss of topsoil? ● Less than Significant Impact.

The United States Department of Agriculture’s (USDA) Web Soil Survey was consulted to determine the nature of the soils that underlie the project site. According to the USDA Web Soil Survey, the site is underlain by Urban Land-Ballona-Typic Xerorthents soils. The Ballona soils are well drained with medium to high runoff characteristics; however, construction activities and the placement of “permanent vegetative cover” will reduce the soil’s erosion risk. These soils are the only native soils that are present within Urban Land-Ballona-Typic Xerorthents soils complex. The Applicant will remove all soils that are unsuitable for development and will replace the underlying soils with clean fill. In addition, the Applicant will install an 11-foot tall retaining wall along the site’s northern boundary and a nine-foot retaining wall along the site’s eastern boundary. Once operational, the project site would be paved over and landscaped, which would minimize soil erosion.

The project’s construction will not result in soil erosion. The project Applicant will be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to Federal NPDES regulations since the project would connect to the City’s MS4. The SWPPP is required to apply for an NPDES General Industrial Activities Storm Water Permit (GIASP). The SWPPP will contain construction best management practices (BMPs) that will restrict the discharge of sediment into the streets and local storm drains. In addition, the project’s contractors must adhere to any construction BMPs identified by the City. As a result, the impacts will be less than significant.

C. Would the project 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? ● Less than Significant Impact.

The project site is underlain by Urban Land-Ballona-Typic Xerorthents soils. Urban Land-Ballona-Typic Xerorthents soils consist of up to 65 percent of non-native human fabricated fill. The Ballona soils component of the Urban Land-Ballona-Typic Xerorthents complex are well drained with medium to high runoff characteristics. The surrounding area is relatively level and is at no risk for landslides. In addition, the Applicant will install retaining walls along the project site’s northern and eastern boundary, respectively. Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading will not affect the proposed project because the underlying soils will be replaced with new clean fill. Moreover, the proposed warehouse will be constructed according to the most recent California Building Code standards. Therefore, lateral spreading caused by liquefaction will not affect the project.

The soils that underlie the project site may be prone to subsidence due to their shrink swell characteristics. Subsidence occurs via soil shrinkage and is triggered by a significant reduction in an underlying groundwater table, thus causing the earth on top to sink. The Applicant is proposing to remove and replace the underlying fill soils. The fill soils that are susceptible to subsidence and shrinking/swelling (those that consist of clay) will be removed and replaced with fill that is suitable for development.

Lastly, the project will not expose future employees and patrons to collapsible soils since the Applicant is proposing to remove the underlying soils. Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Lastly, the new warehouse will be constructed with adherence to the most recent and stringent building code requirements. As a result, the potential impacts are considered to be less than significant.

D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? Less than Significant Impact.

As indicated previously, the site is underlain by Urban Land-Ballona-Typic Xerorthents soils. Approximately 65 percent of these soils consist of non-native human fabricated fill. In addition, Ballona soils comprise approximately 20 percent of the Urban Land-Ballona-Typic Xerorthents soils. Up to 40 percent of Ballona soils consist of clay. If soils consist of expansive clay, damage to foundations and structures may occur. The project's implementation will require the removal of the underlying fill. Therefore, all soils not suitable for development will be excavated and new fill capable of supporting the project will be imported. As a result, the potential impacts are considered to be less than significant.

E. Would the project 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? No Impact.

No septic tanks will be used as part of proposed project. The project will continue to be connected to the existing sanitary sewer system. As a result, no impacts associated with the use of septic tanks will occur as part of the proposed project's implementation.

4.6.3 Mitigation Measures

The analysis determined that the proposed project would not result in any significant impacts related to geology and soils. As a result, no mitigation measures are required.


4.7 **GREENHOUSE GAS EMISSIONS**

4.7.1 **THRESHOLDS OF SIGNIFICANCE**

A project may be deemed to have a significant adverse impact on greenhouse gas emissions if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and,
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.7.2 **ENVIRONMENTAL ANALYSIS**

A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ● Less than Significant Impact.*

The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The SCAQMD has established multiple draft thresholds of significance. These thresholds include 1,400 metric tons of CO₂E (MTCO₂E) per year for commercial projects, 3,500 MTCO₂E per year for residential projects, 3,000 MTCO₂E per year for mixed-use projects, and 7,000 MTCO₂E per year for industrial projects. In addition, an initial threshold of 10,000 MTCO₂E per year for industrial projects was established in 2008.

Table 4-5 summarizes annual greenhouse gas (CO₂E) emissions from the proposed project. Carbon dioxide equivalent, or CO₂E, is a term that is used for describing different greenhouses gases in a common and collective unit. As indicated in Table 4-5, the CO₂E total for the project is 1,418.61 pounds per day or 0.64 MTCO₂E per day. This translates into a generation of approximately 233.60 MTCO₂E per year, which is below the aforementioned threshold. The project’s construction would result in a generation of 2,714.30 pounds of CO₂ per day or 1.23 MTCO₂E per day. This translates into an annual generation of 448.95 MTCO₂E per year. When amortized over a 30-year period, these emissions decrease to 14.96 MTCO₂E per year. These amortized construction emissions were added to the project’s operational emissions to calculate the project’s true GHG emissions. As shown in the table, the project’s total operational emissions would be 248.56 MTCO₂E per year, which is still below the thresholds identified for all land uses.
Table 4-5

Greenhouse Gas Emissions Inventory

<table>
<thead>
<tr>
<th>Source</th>
<th>GHG Emissions (Lbs/Day)</th>
<th>CO₂</th>
<th>CH₄</th>
<th>N₂O</th>
<th>CO₂E</th>
</tr>
</thead>
<tbody>
<tr>
<td>Long-term Area Emissions</td>
<td>0.01</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.01</td>
</tr>
<tr>
<td>Long-term Mobile Emissions</td>
<td>1,392.84</td>
<td>0.06</td>
<td>--</td>
<td>--</td>
<td>1,394.45</td>
</tr>
<tr>
<td>Total Long-term Emissions</td>
<td><strong>1,416.85</strong></td>
<td><strong>0.06</strong></td>
<td>--</td>
<td>--</td>
<td><strong>1,418.61</strong></td>
</tr>
<tr>
<td>Total Construction Emissions</td>
<td><strong>2,703.78</strong></td>
<td><strong>0.54</strong></td>
<td>--</td>
<td>--</td>
<td><strong>2,714.30</strong></td>
</tr>
<tr>
<td>Total Long-term Emissions (MTCO₂E)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>248.56 MTCO₂E per year</td>
</tr>
<tr>
<td>Amortized Construction Emissions</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Thresholds of Significance</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>10,000 MTCO₂E per year</td>
</tr>
</tbody>
</table>

Source: CalEEMod V.2016.3.2

As indicated in the table, the great majority of the GHG emissions will be generated from mobile sources. The project’s operational GHG emissions were calculated using the CalEEMod version 2016.3.2. The type of activities that may be undertaken once the project is operational have been predicted and accounted for in the model for the selected land use type. It is important to note that the project is an “infill” development, which is seen as an important strategy in combating the release of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State’s Strategic Growth Council (SGC). Promoting and enabling sustainable infill development is a principal objective of the SGC because of its consistency with the State Planning Priorities and because infill furthers many of the goals of all of the Council’s member agencies. Focusing growth toward infill areas takes development pressure off conservation lands and working lands; it increases transit rider-ship and reduces vehicle trips; it requires less per capita energy and water use than less space-efficient development; it improves public health by promoting active transportation and active lifestyles; and it provides a more equitable mix of housing choices, among other benefits.

B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?  ● Less than Significant Impact.

AB-32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28 percent reduction in "business as usual" GHG emissions for the entire State. Additionally, Governor Edmund G. Brown signed into law Executive Order (E.O.) B-30-15 on April 29, 2015, the Country’s most ambitious policy for reducing Greenhouse Gas Emissions. Executive Order B-30-15 calls for a 40 percent reduction in greenhouse gas emissions below 1990 levels by 2030. The proposed project will

59 California Strategic Growth Council. http://www.sgc.ca.gov/Initiatives/infill-development.html. Promoting and enabling sustainable infill development is a principal objective of the SGC because of its consistency with the State Planning Priorities and because infill furthers many of the goals of all of the Council’s member agencies. Focusing growth toward infill areas takes development pressure off conservation lands and working lands; it increases transit rider-ship and reduces vehicle trips; it requires less per capita energy and water use than less space-efficient development; it improves public health by promoting active transportation and active lifestyles; and it provides a more equitable mix of housing choices, among other benefits.

not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. The emissions generated by the proposed project will be less than the thresholds of significance established for CO₂ (refer to Table 4-5). As a result, no impacts related to a potential conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases are anticipated.

The proposed project will be in accordance with the City’s Building Code requirements and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The 2016 version of the standards became effective as of January 1, 2017. The 2016 version address additional items such as clean air vehicles, increased requirements for electric vehicles charging infrastructure, organic waste, and water efficiency and conservation. The California Green Building Standards Code does not prevent a local jurisdiction from adopting a more stringent code as State law provides methods for local enhancements.

In addition, the project will be LEED BD+C: New Construction certified. The proposed project will include the installation and use of energy efficient lighting. This new lighting will also be controlled by timers to limit wasteful energy consumption. Furthermore, the project will provide four Level II electric vehicle chargers and roof mounts for future solar panels. Lastly, the project is an “infill development” and is seen as an important strategy in reducing regional GHG emissions. Infill development is a key priority of SCAG, whose goal is to implement land use policies that encourage more density and redevelopment of underutilized urban parcels located within transit priority areas (according to Zoning Information and Map Access System [ZIMAS], the project site is located within a transit priority area). Furthermore, SCAG is embracing recent innovations in mobility as part of their 2016 RTP, including the use of alternative fueled vehicles and establishing a network of electric vehicle charging stations. The 2016 SCAG RTP includes the following recommendations for reducing GHG emissions:

- **Use energy and fuel efficient vehicles and equipment.** The proposed project will include the installation and use of energy efficient lighting. This new lighting will also be controlled by timers to limit wasteful energy consumption. Furthermore, the project will provide four Level II electric vehicle chargers.

- **Incorporate design measures to reduce energy consumption and increase use of renewable energy.** The project will include roof mounts for future solar panels.

- **Plant shade trees in or near construction projects where feasible.** The project’s implementation will require the removal of the eucalyptus trees located along the west side of Marianna Avenue. These trees will be replaced at a 2:1 ratio.
• **Construct buildings to Leadership in Energy and Environmental Design (LEED) certified standards.** The project will be LEED BD+C: New Construction certified.

As indicated in the 2016 RTP, the City of Los Angeles is projected to add a total of 472,700 jobs through the year 2040.\(^6\) The employment increase of 32 persons that will result from the completion of the proposed project is well within SCAG’s growth forecast for the City of 472,700 jobs.

The City of Los Angeles recently adopted the Sustainable City Plan, which is currently being implemented by the City as a means to combat climate change, balance economic growth with environmental stewardship, and improve the quality of life for all City residents. The proposed project is consistent with the following strategies identified in the Sustainable City Plan:

- **Create PV installation requirement for City projects.** The project will include roof mounts for future solar panels.

- **Increase the municipal green building standard for new construction.** The project will be LEED BD+C: New Construction certified.

Since the project will not deviate from any applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases, the potential impacts are considered to be less than significant.

### 4.7.3 Mitigation Measures

The analysis of potential impacts related to GHG emissions indicated that the proposed project would not result in any adverse impacts. As a result, no mitigation measures are required.

### 4.8 Hazards & Hazardous Materials

#### 4.8.1 Thresholds of Significance

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact regarding hazards or hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials;

- 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;

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

---

● 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;

● 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 for people residing or working in the project area;

● For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area;

● Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or,

● Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

4.8.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ● Less than Significant Impact.

The project’s construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project’s construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. The use and storage of these materials will not lead to a significant impact since their use and transport is governed by the Environmental Protection Agency. In addition, the use of these chemicals and materials will be restricted to the project site and a portion of the Marianna Avenue right-of-way located adjacent to the site.

The proposed project will involve the construction of an evidence warehouse for the LAPD. The evidence brought into the project may include hazardous and/or medical waste such as bloody weapons and articles of clothing, or other items containing organic matter. Therefore, the LAPD will be required to comply with Federal and State regulations regarding hazardous materials. The LAPD would also be required to comply with the EPA’s Hazardous Materials Transportation Act, Title 42, Section 11022 of the United States Code and Chapter 6.95 of the California Health and Safety Code which requires the reporting of hazardous materials when used or stored in certain quantities. In addition, evidence brought into the facility may also consist of medical waste. As a result, the proposed facility will be required to comply with all pertinent standards that govern the handling and disposal of medical waste. According to the State’s Medical Waste Management Act:
“Medical waste” means any biohazardous, pathology, pharmaceutical, or trace chemotherapy waste not regulated by the federal Resource Conservation and Recovery Act of 1976 (Public Law 94-580), as amended; sharps and trace chemotherapy wastes generated in a health care setting in the diagnosis, treatment, immunization, or care of humans or animals; waste generated in autopsy or necropsy; waste generated during preparation of a body for final disposition such as cremation or interment; waste generated in research pertaining to the production or testing of microbiologials; waste generated in research using human or animal pathogens; sharps and laboratory waste that poses a potential risk of infection to humans generated in the inoculation of animals in commercial farming operations; waste generated from the consolidation of home-generated sharps; and waste generated in the cleanup of trauma scenes. Biohazardous, pathology, pharmaceutical, sharps, and trace chemotherapy wastes that meet the conditions of this section are not subject to any of the hazardous waste requirements found in Chapter 6.5 (commencing with Section 25100) of Division 20.62

The medical waste will be stored in the freezer and cooler, which will protect the integrity of the organic evidence. Soiled waste, medical packaging, bed sheets, and other clothing will be disposed of into properly designated waste storage areas. In addition, biological evidence will be disposed of in specially designated bio-hazard disposal bins. The proposed facility, once operational, will be required to prepare a Medical Waste Management Plan pursuant to Sections 117935 or 117960 of the California Health and Safety Code. Adherence to the pertinent regulations, such as the required preparation of the Medical Waste Management Plan, will reduce potential impacts to levels that are less than significant. This plan will contain specific provisions for handling and disposing needles, human waste, and pharmaceutical waste. In addition, the plan will include guidelines for the storage of medical waste, the cleaning of containers, and the cleanup of spills or releases.

B. Would the project 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? ● Less than Significant Impact with Mitigation.

The project site is not located on the California Department of Toxic Substances Control’s Hazardous Waste and Substances Site List - Site Cleanup (Cortese List).63 In addition, the project site is not identified on any Leaking Underground Storage Tank database (LUST).64 A search through the California Department of Toxic Substances Control’s (DTSC) Envirostor database indicated that the project site was subject to voluntary cleanup under the oversight of the DTSC.

According to the DTSC, more than half of the property area was used for storage of raw materials and finished products. The primary function of the facility was the blending of special lubricants and hydraulic fluids from 1961 until 1995, when operations reportedly ceased at the facility.65 The facility included oil storage tank farms, oil blending processing equipment, chemical storage units, warehouses, a laboratory, and an administrative building. The site was restricted to industrial use due to the presence of inaccessible contaminants. Contaminants that have been identified include chloroform, benzene, Freon 113 and carbon tetrachloride, as well as low levels of metals.66 Polychlorinated Biphenyls (PCBs) were detected in soils in one area associated with a heat exchanger.

---

62 California Department of Public Health Medical Waste Management Program. Medical Waste Management Act, Chapter 2-Definitions, Section 117690 Medical Waste.
All of the concentrations of PCBs were below the regulatory screening levels.

Matrix New World Engineering, Inc. (Matrix) performed a Phase I Environmental Site Assessment (ESA) for the project site in 2015 to document the environmental conditions at the project site. According to available historical sources, the project site was owned and operated by Union Carbide from approximately 1918 to 1961, which reportedly produced acetylene during this period. According to a Sanborn fire insurance map dated 1949, Chubbick Lime Company and Prest-O-Lite Company Inc. occupied the project site. From 1955 until 1961, the project site was occupied by Linde Air Products and Chubbick Lime Company. In 1961, Bray Oil Company purchased the project site and occupied the facility between 1961 to 1981. According to records from the City of Los Angeles, Bray Wood Company and Sun Oil Company of Pennsylvania also occupied the facility between 1972 and 1978. In 1981, Burmah-Lubricants, Inc., acquired all of the stock of Bray Oil Company which subsequently merged with Castrol Inc. The primary function of the facility involved the blending of special lubricants and hydraulic fluids between 1961 until 1995, when operations reportedly ceased at the facility. The facility included oil storage tank farms, oil blending processing equipment, chemical storage units, warehouses, a laboratory, and an administrative building.67

A recognized environmental condition (REC) refers to the presence or likely presence of any hazardous substance or petroleum product on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term REC includes hazardous substances and petroleum products even under conditions that might be in compliance with laws. Matrix identified the petroleum hydrocarbon impacted groundwater at the project site as a REC.68

A controlled recognized environmental condition (CREC) refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. The project site has a long history of industrial use which included oil storage tank farms, oil blending, processing equipment, and chemical storage which impacted the soil and groundwater beneath the site.

63 CalEPA. DTSC’s Hazardous Waste and Substances Site List - Site Cleanup (Cortese List).
http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm

64 California State Water Resources Control Board, GeoTracker.
https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=losangeles.ca

65 CalEPA. Bray Oil/Burmah Castrol, Inc.

66 Ibid.


68 Ibid.
The property received a “No Further Action” declaration for on-site soils under a “Land Use Covenant” which limits the proposed project to commercial and industrial uses only. The Land Use Covenant would have to be removed by remediating the soils to residential cleanup standards (under regulatory supervision) prior to any residential development taking place at the project site. The Land Use Covenant at the project site represents a CREC.69

A historical recognized environmental condition (HREC) refers to an environmental condition which would have been considered a REC in the past, but which is no longer considered a REC based on subsequent assessment or regulatory closure. Matrix did not identify any HRECs during the course of the environmental assessment for the project site.70 However, Matrix did identify the presence of rubbish and debris throughout the site. These waste materials have been removed from the project site.71

According to Mr. Sean Rahkshani, former Senior Consultant with Matrix (the preparer of the Phase I), groundwater located below the site now has a full and unrestricted No Further Action Letter.72 The 15-foot limitation remains imposed on the property because the land use covenant that was filed against the deed of the property must remain in effect until it is formally lifted (both un-restricted soil contamination and groundwater NFA).73 At the time the land use covenant (LUC) was filed, groundwater was still impacted (groundwater was generally deeper than 15 feet, but since levels can vary, they have a factor of safety built into the 15-foot depth limit).74 The underlying groundwater was cleaned up and received an NFA. However, the LUC remains because of minor soil impacts. This minor soil contamination is a pre-existing condition generated by the site’s former use. At the time of the Phase I, there was a single detection of benzene in soil gas at ten feet bgs near Matrix boring MX-B5 above cleanup levels.75 However, other than the residual contaminants present at the aforementioned boring location, there is no soil contamination present 15 feet bgs.76

The project’s implementation will require grading and excavation that reaches up to depths of 11 feet bgs. No digging below 15 feet will occur pursuant to the restrictive covenant issued by the DTSC. However, the LUC can be lifted if the City decides to test soil gas samples from borings near Matrix boring MX-B5 for VOCs (particularly Benzene). If the soils near Matrix boring MX-B5 contain trace VOCs, the City could request a lifting of the LUC from DTSC. If levels of VOCs remain above regulatory standards, the City could choose to remediate the soil by excavating and re-compacting it, though this procedure would only be necessary to obtain a clearance from the DTSC to remove the LUC. It is likely

---

69 Matrix New World Engineering, Inc. Phase I Environmental Site Assessment Report, 1925 North Marianna Avenue and 4671 Worth Street, Los Angeles, California 90032. May 29, 2015.

70 Ibid.

71 Blodgett Baylosis Environmental Planning. Site survey. Survey was conducted on August 17, 2018. AND, Email communication with Mr. Ken Jackson, CEO of Camfield Partners. Email was dated August 17, 2018.

72 Email communication with Mr. Sean Rahkshani, former Senior Consultant with Matrix now with EA Science LLC. Email was dated August 17, 2018

73 Ibid.

74 Ibid.

75 Ibid.

76 Ibid.
that grading and on-going site disturbance may have lowered levels of detectable VOCs at that Matrix boring location.

The City is currently conducting a separate Phase II sub-surface site investigation. They will be testing at 17 different boring locations up to 15 feet bgs to confirm the Matrix’s and DTSC’s findings. The following mitigation measure will be required if residual contamination is encountered:

- In the event remediation of any contamination on the land and/or the adjacent development property is necessary for the Applicant to construct and complete the project for the intended future use of the project, as specified in Section 6.1.1 of the Purchase and Sale agreement, such remediation shall not be considered a Buyer-proposed Change Order, and the Applicant (Seller), at its cost and expense, shall be solely responsible for such remediation work in connection with the construction of the project, which shall be diligently completed in compliance with all applicable regulations and requirements in all material respects and shall receive all applicable regulatory sign-off prior to closing. Any required remediation shall have an associated soil management plan (SMP), a remedial action plan (RAP), and human health risk assessment (HHRA) prepared. Contaminants to be remediated upon discovery include but are not limited to: Volatile Organic Compounds (VOCs) in soil and soil gas as well as Polycyclic Aromatic Hydrocarbons (in soil), Semi Volatile Organic Compounds (in soil), Polychlorinated Biphenyls (in soil), metals (in soil), and total petroleum hydrocarbons (in soil). In the event other contaminants are encountered in soil, soil gas, or groundwater during construction or during the City’s Phase II sub-surface investigation, those contaminants shall be remediated to appropriate thresholds. A contingency plan for identifying, handling, and disposing of contaminated material shall be in accordance with applicable laws, regulations, ordinances, and formally adopted City standards. The plan describes measures that apply to handling and disposing of stained or hydrocarbon-contaminated and other contaminated soils should they be encountered during site excavations. These measures will reduce hazards to people or the environment from exposure to hazardous materials to a less-than-significant level. Specifically, the plan shall address, but not be limited to, the following:

  - Excavation of Contaminated Soils

    - The soils that have visible staining or an odor must be tested in the field by the contractor or qualified environmental subcontractor with an organic vapor analyzer (OVA) for volatile components, which require additional considerations in their handling. Soils with OVA readings exceeding 50 ppm volatile organic compounds (probe held 3 inches from the excavated soil face), or that are visibly stained or have a detectable petrochemical odor should be stockpiled by the Contractor separately from uncontaminated soils. The stockpiles should be barricaded near the excavation area, away from drainage areas or catch basins, on an impermeable plastic liner (6 millimeter nominal thickness and tested at 100 psi strength). Caution must be taken to separate any contaminated soil from the remainder of the excavated material. If only a small amount of contaminated soil is encountered, it may be drummed in 55-gallon steel drums with sealing lids. The
soil will then be sampled in a random and representative manner. To establish waste classification, samples will then be analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH), volatile organics (VOC), Semi-volatile Organic Compounds, Title 22 heavy metals, reactivity (pH), corrosivity, and toxicity. The number of samples will depend on the volume of material removed, one sample for approximately every ton of soil. Storage space available at the site and neighborhood sensitivity will determine the amount of soil that can be stockpiled.

- If volatile compounds are present at concentrations exceeding 50 ppm, an AQMD permit will be required, which most likely will require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution. The Contractor shall obtain all permits.

- Suspected contaminated soil samples can be taken to a State-certified environmental laboratory or tested in the field with a mobile lab and technician using infrared spectrometry with EPA Method 1664 for TRPH. Materials with elevated levels of TRPH, metals or other regulated contaminants will require handling by workers who have been adequately trained for health and safety aspects of hazardous material handling.

- Removal and Classification of Excavated Soil

- Any contaminated material (soil, asphalt, brick, burned material, concrete, or debris) that is to be hauled off the site is considered a "waste product" and must be classified as hazardous or nonhazardous waste under all criteria by both state and federal Codes prior to disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest will prepared by the Contractor or its qualified representative and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels that can be returned to the excavation, a less costly nonhazardous transporter and soil recycling facility may be used if no hazardous constituents are present above their respective action levels.

- Currently, there are no established regulatory limits or threshold values whereby soil with TRPH only can be classified as hazardous, although the California Code of Regulations (CCR) Title 22 provides limits for the volatile hydrocarbon constituents (including solvents), PCBs, and metals. Therefore, until new criteria are released by the state or federal agencies, soil levels of 100 ppm TRPH (crude oil, waste oil, and diesel), 10 ppm gasoline, and 1/50/50/50/ ppm benzene, toluene, ethylbenzene and xylenes, respectively, are proposed. Soil contaminated with hydrocarbons at values less than these values may be backfilled, used for fill, or paved over. A soil recycling facility should accept the material containing TRPH, assuming it is not hazardous due to metals or other contaminants.
• Depending on the results of the sampling, this soil material is recycled into building foundation material, road pavement, landfill cover, etc. A Class III (municipal) landfill may also accept soils with only TRPH contamination above 1,000 mg/Kg at the facility’s discretion, but below certain levels specified by the Los Angeles Regional Water Quality Control Board, upon approval of an application (Report of Waste Discharge) with that agency. All excavated material moved off site must be manifested, transported by a registered hauler, and disposed of in the proper class landfill or recycler. These facilities can be contacted ahead of time regarding their acceptance of SVOCs.

• Health and Safety Issues

• The contractor shall be licensed for hazardous materials handling and hauling or have a qualified licensed subcontractor on call. The workers exposed to or handling contaminated soils shall have sufficient health and safety training, consistent with OSHA Hazardous Waste Operation Standards (29 CFR 1910.120), and Cal-OSHA "Hazardous Waste Operations & Emergency Response" (8 CCR 5192).

• The contractor, qualified subcontractor or an industrial hygienist shall prepare a site-specific health and safety plan. The plan shall appoint a site safety officer and establish responses (but not limited to) to heavy metals, solvents, SVOCs, and petroleum hydrocarbons that may be encountered during excavations. Trapped pockets of methane and hydrogen sulfide gas and areas of low oxygen are common in excavations of this area, and are usually mitigated in confined excavations with proper monitoring and ventilation. The plan should specify particular action levels for each contaminant found during exploratory drilling and suspected to occur along the alignment and provide guidelines for personal safety and public protection, including monitoring and appropriate personal protective equipment needed on the jobsite during all phases of excavation of the project. The responsibility for maintenance and calibration of monitoring gear should be specified. The goal is to prevent health-significant inhalation and dermal exposure to hydrocarbon SVOC- or metal-contaminated soils, explosions, and fires and to provide methods of decontaminating workers and equipment if contamination levels exceed those cited in the plan. Preventing unauthorized entry into the work and stockpile areas shall be included.

The removal of any residual contamination would be feasible given the limited quantities of soil that are impacted. Arcadis U.S., Inc. (Arcadis) submitted a well destruction report for the former Castrol Facility located that formerly occupied the project site. The well destruction report summarized the well destruction activities that were conducted at the site on May 22, 2017. On May 22, 2017, ABC Liovin Drilling, Inc. (ABC Drilling). The well destruction activities were conducted in accordance with the work plan and LACDPH well standards. ABC Drilling submitted well completion forms for monitoring wells MW-1 through MW-6 to the California Department of Water Resources, under the
supervision of Arcadis staff, destroyed monitoring wells MW-1 through MW-6. Arcadis has decommissioned the remaining monitoring wells associated with the site.77

No regulated waste was generated during the well destruction process. Clean concrete debris, well casings, and well box debris were properly disposed of by ABC Drilling as construction waste. The well destruction activities were conducted in accordance with the well destruction work plan that was submitted to the Department of Toxic Substance Control (DTSC) on January 3, 2017. DTSC approved the work plan in their letter that was dated March 14, 2017. The wells were destroyed in accordance with the Los Angeles County Department of Public Health (LACDPH) requirements for well decommissioning.78

As stated above, the LAPD will be required to comply with the regulations identified by the California Health and Safety Code and the United States Code regarding the handling and transport of hazardous and medical waste. There are no structures located on-site. Therefore, the risk of encountering lead based paint or asbestos containing materials is minimal. The project’s construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project’s construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. As a result, the potential impacts are considered to be less than significant with the implementation of the aforementioned mitigation measure.

C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? • No Impact.

There are no schools located within one-quarter of a mile from the project site. The closest school is Murchison Elementary School, located 0.86 miles to the southwest of the site.79 As a result, no impacts will occur.

D. Would the project 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? • No Impact.

The Cortese List, also referred to as the Hazardous Waste and Substances Sites List or the California Superfund List, is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. California Government Code section 65962.5 requires the California Environmental Protection Agency to develop and update the Cortese List on annually basis. The list is maintained as part of the DTSC’s Brownfields and Environmental Restoration Program referred to as EnviroStor. A search was conducted through the California Department of Toxic Substances Control

---

77 Arcadis U. S, Inc. Well Destruction Report Former Castrol Facility 1925 North Marianna Avenue, Los Angeles, California (DTSC Consent Order No. HFA 87-045). June 12, 2017

78 Ibid.

Envirostor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.\textsuperscript{80} Therefore, no impacts will occur.

As indicated previously, the project site was listed as a Voluntary Cleanup Site under the DTSC’s Envirostor database. However, a No Further Action Letter was issued by the DTSC in September of 2017.\textsuperscript{81} Arcadis U.S., Inc. (Arcadis) submitted a well destruction report for the former Castrol Facility located that formerly occupied the project site. The well destruction report summarized the well destruction activities that were conducted at the site on May 22, 2017. On May 22, 2017, ABC Liovin Drilling, Inc. (ABC Drilling). The well destruction activities were conducted in accordance with the work plan and LACDPH well standards. ABC Drilling submitted well completion forms for monitoring wells MW-1 through MW-6 to the California Department of Water Resources, under the supervision of Arcadis staff, destroyed monitoring wells MW-1 through MW-6. Arcadis has decommissioned the remaining monitoring wells associated with the site.\textsuperscript{82} As noted in subsection 4.8.2.B, no significant hazard with respect to the pre-existing contamination on the site will occur and no impacts will occur.

\textbf{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 for people residing or working in the project area? • No Impact.}

The project site is not located within two miles of an operational public airport. The nearest airport is San Gabriel Valley Airport, located approximately nine miles to the northeast. The site is not located within the designated Runway Protection Zone and the proposed project will not penetrate the airport’s 20:1 slope. Essentially, the proposed project will not introduce a building that will interfere with the approach and take off of airplanes utilizing the aforementioned airport. The runway protection zones for approaches and takeoffs are 1,000 feet. This protection zone does not extend to the project site. As a result, the proposed project’s implementation would not present a safety hazard to aircraft and/or airport operations at a public use airport, and no impacts will occur.

Furthermore, the project site is not located within any 60 Community Noise Equivalent Level (CNEL) boundaries. The proposed project will be 77 feet in height and will be exempt from Federal Aviation Administration (FAA) lighting requirements per FAA AC 70/7460-1L – Obstruction Marking and Lighting with Change. According to Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) tower lighting requirements, all structures exceeding 200 feet above ground level (AGL) must be appropriately marked with tower lights or tower paint. In addition, the Federal Communications Commission governs monitoring requirements. As a result, the proposed project will not present a safety or noise hazard related to aircraft or airport operations at a public use airport to people residing or working in the project area and no impacts will occur.

\textsuperscript{80} CalEPA. DTSC’s Hazardous Waste and Substances Site List - Site Cleanup (Cortese List). \url{http://www.dtsc.ca.gov}

\textsuperscript{81} CalEPA. Bray Oil/Burmah Castrol, Inc. \url{https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=19290275#sitefacdocs}

\textsuperscript{82} Arcadis U. S., Inc. Well Destruction Report Former Castrol Facility 1925 North Marianna Avenue, Los Angeles, California (DTSC Consent Order No. HFA 87-045). June 12, 2017
F. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? • No Impact.

The project site is located 1.64 miles northeast of the University of Southern California University Hospital Heliport.\(^8\) The proposed project will not present a safety hazard for helicopters utilizing the heliport because helicopters typically take off and land in a vertical manner. Thus, the project would have to be constructed directly over the heliport in order to generate a significant impact. As a result, the proposed project will not present a safety hazard related to aircraft and/or airport operations at a private use airstrip and no impacts will occur.

G. Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? • No Impact.

At no time will Marianna Avenue or any of the surrounding streets be completely closed to traffic. All construction staging areas will be located within the project site. As a result, the project would not impair the implementation of, or physically interfere with; an adopted emergency response plan or emergency evacuation plan and no impacts are associated with the proposed project’s implementation.

H. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wild lands fire, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands? • No Impact.

According to the City’s ZIMAS database, the project site is not located within a very high fire hazard severity zone.\(^8\) The project site and the adjacent properties are urbanized and there are no areas of native or natural vegetation found within the vicinity of the project area. The proposed project may be exposed to criteria pollutant emissions generated by wildland fires due to the project site’s proximity to the San Gabriel Mountains. However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. As a result, there are no impacts associated with potential wildfires from off-site locations.

4.8.3 Mitigation Measures

The analysis of hazards and hazardous materials indicated that the following mitigation measure would be required:

*Mitigation Measure No. 3 (Hazards & Hazardous Materials).* In the event remediation of any contamination on the land and/or the adjacent development property is necessary for the Applicant to construct and complete the project for the intended future use of the project, as specified in Section 6.1.1 of the Purchase and Sale agreement, such remediation shall not be considered a Buyer-proposed Change Order, and the Applicant (Seller), at its cost and expense, shall be solely responsible for such remediation work in connection with the construction of the

---

\(^8\) Google Earth. Site accessed July 9, 2018.

\(^8\) ZIMAS. The City’s ZIMAS program indicates that the site is not located within a very high fire hazard severity zone.
project, which shall be diligently completed in compliance with all applicable regulations and requirements in all material respects and shall receive all applicable regulatory sign-off prior to closing. Any required remediation shall have an associated soil management plan (SMP), a remedial action plan (RAP), and human health risk assessment (HHRA) prepared. Contaminants to be remediated upon discovery include but are not limited to: Volatile Organic Compounds (VOCs) in soil and soil gas as well as Polycyclic Aromatic Hydrocarbons (in soil), Semi Volatile Organic Compounds (in soil), Polychlorinated Biphenyls (in soil), metals (in soil), and total petroleum hydrocarbons (in soil). In the event other contaminants are encountered in soil, soil gas, or groundwater during construction or during the City's Phase II sub-surface investigation, those contaminants shall be remediated to appropriate thresholds. A contingency plan for identifying, handling, and disposing of contaminated material shall be in accordance with applicable laws, regulations, ordinances, and formally adopted City standards. The plan describes measures that apply to handling and disposing of stained or hydrocarbon-contaminated and other contaminated soils should they be encountered during site excavations. These measures will reduce hazards to people or the environment from exposure to hazardous materials to a less-than-significant level. Specifically, the plan shall address, but not be limited to, the following:

- **Excavation of Contaminated Soils**

  - The soils that have visible staining or an odor must be tested in the field by the contractor or qualified environmental subcontractor with an organic vapor analyzer (OVA) for volatile components, which require additional considerations in their handling. Soils with OVA readings exceeding 50 ppm volatile organic compounds (probe held 3 inches from the excavated soil face), or that are visibly stained or have a detectable petrochemical odor should be stockpiled by the Contractor separately from uncontaminated soils. The stockpiles should be barricaded near the excavation area, away from drainage areas or catch basins, on an impermeable plastic liner (6 millimeter nominal thickness and tested at 100 psi strength). Caution must be taken to separate any contaminated soil from the remainder of the excavated material. If only a small amount of contaminated soil is encountered, it may be drummed in 55-gallon steel drums with sealing lids. The soil will then be sampled in a random and representative manner. To establish waste classification, samples will then be analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH), volatile organics (VOC), Semi-volatile Organic Compounds, Title 22 heavy metals, reactivity (pH), corrosivity, and toxicity. The number of samples will depend on the volume of material removed, one sample for approximately every ton of soil. Storage space available at the site and neighborhood sensitivity will determine the amount of soil that can be stockpiled.

  - If volatile compounds are present at concentrations exceeding 50 ppm, an AQMD permit will be required, which most likely will require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution. The Contractor shall obtain all permits.
• Suspected contaminated soil samples can be taken to a State-certified environmental laboratory or tested in the field with a mobile lab and technician using infrared spectrometry with EPA Method 1664 for TRPH. Materials with elevated levels of TRPH, metals or other regulated contaminants will require handling by workers who have been adequately trained for health and safety aspects of hazardous material handling.

• Removal and Classification of Excavated Soil

• Any contaminated material (soil, asphalt, brick, burned material, concrete, or debris) that is to be hauled off the site is considered a "waste product" and must be classified as hazardous or nonhazardous waste under all criteria by both state and federal Codes prior to disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest will be prepared by the Contractor or its qualified representative and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels that can be returned to the excavation, a less costly nonhazardous transporter and soil recycling facility may be used if no hazardous constituents are present above their respective action levels.

• Currently, there are no established regulatory limits or threshold values whereby soil with TRPH only can be classified as hazardous, although the California Code of Regulations (CCR) Title 22 provides limits for the volatile hydrocarbon constituents (including solvents), PCBs, and metals. Therefore, until new criteria are released by the state or federal agencies, soil levels of 100 ppm TRPH (crude oil, waste oil, and diesel), 10 ppm gasoline, and 1/50/50/50/50 ppm benzene, toluene, ethylbenzene and xylenes, respectively, are proposed. Soil contaminated with hydrocarbons at values less than these values may be backfilled, used for fill, or paved over. A soil recycling facility should accept the material containing TRPH, assuming it is not hazardous due to metals or other contaminants.

• Depending on the results of the sampling, this soil material is recycled into building foundation material, road pavement, landfill cover, etc. A Class III (municipal) landfill may also accept soils with only TRPH contamination above 1,000 mg/Kg at the facility's discretion, but below certain levels specified by the Los Angeles Regional Water Quality Control Board, upon approval of an application (Report of Waste Discharge) with that agency. All excavated material moved off site must be manifested, transported by a registered hauler, and disposed of in the proper class landfill or recycler. These facilities can be contacted ahead of time regarding their acceptance of SVOCs.
● Health and Safety Issues

- The contractor shall be licensed for hazardous materials handling and hauling or have a qualified licensed subcontractor on call. The workers exposed to or handling contaminated soils shall have sufficient health and safety training, consistent with OSHA Hazardous Waste Operation Standards (29 CFR 1910.120), and Cal-OSHA "Hazardous Waste Operations & Emergency Response" (8 CCR 5192).

- The contractor, qualified subcontractor or an industrial hygienist shall prepare a site-specific health and safety plan. The plan shall appoint a site safety officer and establish responses (but not limited to) to heavy metals, solvents, SVOCs, and petroleum hydrocarbons that may be encountered during excavations. Trapped pockets of methane and hydrogen sulfide gas and areas of low oxygen are common in excavations of this area, and are usually mitigated in confined excavations with proper monitoring and ventilation. The plan should specify particular action levels for each contaminant found during exploratory drilling and suspected to occur along the alignment and provide guidelines for personal safety and public protection, including monitoring and appropriate personal protective equipment needed on the jobsite during all phases of excavation of the project. The responsibility for maintenance and calibration of monitoring gear should be specified. The goal is to prevent health-significant inhalation and dermal exposure to hydrocarbon SVOC- or metal-contaminated soils, explosions, and fires and to provide methods of decontaminating workers and equipment if contamination levels exceed those cited in the plan. Preventing unauthorized entry into the work and stockpile areas shall be included.

4.9 HYDROLOGY & WATER QUALITY

4.9.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse environmental impact on hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements;

- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
• Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

• 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;

• Otherwise substantially degrade water quality;

• Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;

• Place within a 100-year flood hazard area structures which would impede or redirect flood flows;

• Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or,

• Inundation by seiche, tsunami, or mudflow.

4.9.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project violate any water quality standards or waste discharge requirements? ● Less than Significant Impact.

Sections 64.70.01 and 64.72 of Article 4.4 of Chapter VI of the Los Angeles Municipal Code were expanded in 2012 by imposing rainwater Low Impact Development (LID) strategies on projects that require building permits. These LID requirements are required in addition to the preparation of the mandatory Standard Urban Stormwater Mitigation Plan (SUSMP). The LID report identifies Low Impact Development standards and practices for stormwater pollution mitigation and provides documentation to demonstrate compliance with the municipal National Pollutant Discharge Elimination System (NPDES) permit on the plans and permit application submitted to the City. The mandatory LID plan would identify operational Best Management Practices (BMPs) that would both reduce the volume of water discharged into the local storm drains and filter out any contaminants present in the stormwater runoff. The implementation of the proposed project would not result in a violation in water quality standards or discharge requirements because the project Applicant would be required to implement the operational Best Management Practices (BMPs) identified in the LID plan. The mandatory LID plan may recommend the use of stormwater detention chambers, grate inlet filters, and bioswales as well as other mechanisms for reducing runoff and removing potential contaminants. Adherence to the aforementioned City mandated requirements would ensure that all potential impacts remain at a level that is less than significant.

In addition, the project’s construction will not result in a violation of water quality standards or waste discharge requirements. The project Applicant will be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to federal NPDES regulations since the project would connect
to the City’s MS4. The SWPPP is required to apply for an NPDES General Industrial Activities Storm Water Permit (GIASP). The SWPPP will contain construction best management practices (BMPs) that will restrict the discharge of sediment into the streets and local storm drains. In addition, the project’s contractors must adhere to any construction BMPs identified by the City. As a result, the impacts will be less than significant.

B. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?  • Less than Significant Impact.

The grading that will be done will not extend to depths required to encounter groundwater. Grading and excavation will not extend into native soils. Therefore no direct construction related impacts to groundwater supplies, or groundwater recharge activities will occur.

As indicated in Section 2, the project will require the extension of an off-site water line to the project site. The site is not currently served by the Los Angeles Department of Water and Power and no City-owned water line connections exist in the immediate area. The project cannot connect to the water lines located to the south of the site since these lines serve the unincorporated portions of Los Angeles County. Therefore, a water line from the north will be extended to the project site. The extension of a City water line will necessitate the closure of a lane along Marianna Avenue to accommodate the trenching. The extension of the water line will also include the installation of two lateral lines (one for each parcel). The lateral line that will serve the project may connect to the northeast corner of the building, just south of the driveway that provides access to the roof. The extension of the water line will not result in a direct decrease in groundwater supplies since the line will convey water sourced by the LA DWP and not from an existing groundwater well.

Furthermore, the project’s contractors will be required to adhere to the applicable Best Management Practices (BMPs) for the construction site. Adherence to the required BMPs will restrict the discharge of contaminated runoff into the local storm drain system. In addition, the BMPs identified in the mandatory LID report may promote groundwater recharge through the filtration and percolation of excess runoff. As a result, the impacts are anticipated to be less than significant.

C. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?  • Less than Significant Impact.

The implementation of the proposed project will reduce the amount of pervious surfaces on-site, though the site’s drainage characteristics will remain intact. Stormwater runoff will either be discharged into storm drains located along Marianna Avenue and Worth Street, or will percolate into the ground. No streams or rivers are located within or adjacent to the project site. The project site is located 1.22 miles to the northwest of the Laguna Channel.85 The proposed project would be restricted

---

to the designated site and would not alter the course of the Laguna Channel (the channel is noted on the U.S. Fish and Wildlife’s National Wetlands Inventory and is a concrete-lined flood control channel).

As indicated previously, the project will increase the amount of impervious surfaces on-site. The increase in the amount of impervious surfaces may lead to an increase in the quantity of stormwater runoff. Additionally, the future impervious surfaces (the new building foot-print, parking areas, etc.) that will be constructed as part of the site’s development could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants within the parking areas. These pollutants may enter the storm drain system during periods of rainfall. For this reason, the project Applicant will be required to install various stormwater controls identified in the LID. These BMPs will either promote the percolation of excess runoff into the ground, or will facilitate the control discharge of excess runoff into the local storm drains. Therefore, the risk of off-site erosion and/or siltation will be minimal given the reduced water runoff and the lack of pervious surfaces outside of the project site.

Thus, the project’s implementation will not substantially increase the rate or amount of surface runoff; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; or provide additional sources of polluted runoff. As a result, the potential impacts are considered to be less than significant.

D. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? • Less than Significant Impact.

The implementation of the proposed project will reduce the amount of pervious surfaces on-site, though the site’s drainage characteristics will remain intact. Stormwater runoff will either be discharged into storm drains located along Marianna Avenue and Worth Street, or will percolate into the ground. No streams or rivers are located within or adjacent to the project site. The project site is located 1.22 miles to the northwest of the Laguna Channel.\textsuperscript{86} The proposed project would be restricted to the designated site and would not alter the course of the Laguna Channel (the channel is noted on the U.S. Fish and Wildlife’s National Wetlands Inventory and is a concrete-lined flood control channel).

As indicated previously, the project will increase the amount of impervious surfaces on-site. The increase in the amount of impervious surfaces may lead to an increase in the quantity of stormwater runoff. Additionally, the future impervious surfaces (the new building foot-print, parking areas, etc.) that will be constructed as part of the site’s development could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants within the parking areas. These pollutants may enter the storm drain system during periods of rainfall. For this reason, the project Applicant will be required to install various stormwater controls identified in the LID. These BMPs will either promote the percolation of excess runoff into the ground, or will facilitate the control discharge of excess runoff into the local storm drains. Therefore, the risk of off-site flooding will be minimal given the reduced water runoff and the lack of pervious surfaces outside of the project site and the impacts will be less than significant.

\textsuperscript{86} Google Earth. Website accessed May 29, 2018.
E. **Would the project 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?**  • *Less than Significant Impact.*

As indicated previously, the project Applicant will be required to install various stormwater controls identified in the mandatory LID. These BMPs will either promote the percolation of excess runoff into the ground, or will facilitate the control discharge of excess runoff into the local storm drains. In addition, these BMPs will filter out contaminants of concern such as oil, grease, leaves, debris, sediment, and other organic and non-organic materials. Thus, the project’s implementation will not substantially increase the rate or amount of surface runoff; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems; or provide additional sources of polluted runoff. As a result, the potential impacts are considered to be less than significant.

F. **Would the project otherwise substantially degrade water quality?**  • *Less than Significant Impact.*

Adherence to the BMPs identified in the mandatory LID plan will reduce potential water quality impacts to levels that are less than significant. As a result, no other impacts are anticipated and no mitigation is required.

G. **Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**  • *No Impact.*

According to the Federal Emergency Management Agency (FEMA) flood insurance map obtained from the Los Angeles County Department of Public Works, the proposed project site is located in Zone X. As this flood zone has an annual probability of flooding of less than 0.2 percent and represents areas outside the 500-year flood plain. Thus, properties located in Zone X are not located within a 100-year flood plain. As a result, no impacts will occur.

H. **Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?**  • *No Impact.*

As indicated previously, the project site is not located within a designated 100-year flood hazard area as defined by FEMA. As a result, the proposed project would not involve the placement of any structures that would impede or redirect potential floodwater flows since the site is not located within a flood hazard area. Therefore, no flood-related impacts are anticipated with the proposed project’s implementation.

---

87 Los Angeles County Department of Public Works. *Flood Zone Determination Website.*  
http://dpw.lacounty.gov/wmd/floodzone/

88 FEMA. *Flood Zones, Definition/Description.*  
http://www.fema.gov/floodplain-management/flood-zones

89 Ibid.
I. Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? • No Impact.

According to the City of Los Angeles' Hazard Mitigation Plan, the project site is not located within the potential inundation areas of the Pacoima Dam, the Devil’s Gate Dam, or the Big Tujunga Dam. In addition, the project site is not located within the inundation area of the Eagle Rock Reservoir. Since the project site is located outside the potential inundation areas of these reservoirs, no impacts are anticipated.

J. Would the project expose people or structures to inundation by seiche, tsunami, or mudflow? • No Impact.

The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. A seiche in the Laguna Channel is not likely to happen due to the current level of channelization and volume of water present. In addition, the project site is located inland approximately 17 miles from the Pacific Ocean and the project area would not be exposed to the effects of a tsunami.90 As a result, less than significant impacts are anticipated.

4.9.3 Mitigation Measures

The analysis indicated that the proposed project would not result in any hydrological, stormwater runoff, or water quality impacts. As a result, no mitigation is required.

4.10 Land Use & Planning

4.10.1 Thresholds of Significance

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant impact on land use and planning if it would:

- Physically divide an established community;

- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or,

- Conflict with any applicable habitat conservation plan or natural community conservation plan.

90 City of Los Angeles General Plan. Safety Element Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles. 1996.
4.10.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project physically divide an established community? • No Impact.

The project site is located in an urban setting and is surrounded on all sides by development. Surrounding land uses and development in the vicinity of the project site include the following:91

- **North of site.** Industrial uses abut the project site to the north. A Southern Pacific Railroad right-of-way (ROW) extends in a northeast to southwest orientation along the northwest corner of the project site. Valley Boulevard is located further north.

- **South of site.** Worth Street extends along the south side of the project site in an east to west orientation. Industrial uses occupy frontage along the south side of Worth Street.

- **East of site.** Marianna Avenue is located adjacent to the project site. An apartment complex is located along the east side of Marianna Avenue.

- **West of site.** An industrial building and the Southern Pacific Railroad ROW abut the site to the west.

The approval of the proposed project will not result in any expansion of the use beyond the current boundaries. Furthermore, the project will not divide an established community because the project site is located within an industrial area; the project is consistent with the site’s MR1-1 zoning designation; and the site was previously occupied by an industrial use. As a result, the project will not lead to any division of the adjacent neighborhood and no impacts will occur.

B. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? • No Impact.

As noted previously, the project site is presently zoned MR1-1 (*Restricted Industrial*) (refer to Exhibit 4-4). The site’s land use designation in the Northeast Los Angeles Community Plan is Industrial (refer to Exhibit 4-5). The activities that will be undertaken within the proposed building including vehicle storage and the use of coolers and freezers are permitted within this underlying zoning district. In addition, no Zone Change, General Plan Amendment, Variance, or Conditional Use Permit is required to implement this project. According to Sections 12.17.1 and 12.17.5 of the City’s Zoning Code, storage buildings/warehouses, and medical laboratories are permitted by right within the MR1-1 zone. The project is a request to construct and operate an evidence warehouse, which features characteristics of medical laboratories and warehouses. Nevertheless, the project is still required to undergo a site plan review. Thus, no conflicts to existing land use regulations will occur.

---

91 Blodgett Bayliss Environmental Planning. *Site survey*. Survey was conducted on May 17, 2018.
EXHIBIT 4-4
ZONING MAP
SOURCE: QUANTUM GIS AND ZIMAS
EXHIBIT 4-5
COMMUNITY PLAN LAND USE MAP
SOURCE: NORTHEAST LOS ANGELES COMMUNITY PLAN
C. Would the project conflict with any applicable habitat conservation plan or natural community conservation plan? • No Impact.

The proposed project will not impact an adopted or approved local, regional, or State habitat conservation plan because the proposed project is located in the midst of an urban area. The project site is not governed by a Natural Community Conservation Plan. Moreover, the closest Significant Ecological Area (SEA) to the project site is the Verdugo Mountains Significant Ecological Area (SEA #40), located approximately nine miles northwest from the project site. The construction and operation of the proposed project will not affect the Verdugo Mountains SEA.

The Los Angeles River is currently the focus of a revitalization effort lead by the City of Los Angeles. The City of Los Angeles intends to focus on the 32-mile portion of the river that flows from Owensmouth Avenue, located in the San Fernando Valley, to the northern border of the City of Vernon. The project site is located 2.60 miles east of the Los Angeles River and the project’s construction and subsequent operation will not affect efforts to revitalize the Los Angeles River. Therefore, no impacts will occur.

4.10.3 Mitigation Measures

The analysis determined that no significant impacts on land use and planning would result from the implementation of the proposed project. As a result, no mitigation measures are required.

4.11 Mineral Resources

4.11.1 Thresholds of Significance

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on mineral resources if it would:

- 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; or,

- 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.


4.11.2 Analysis of Environmental Impacts

A. Would the project 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? • No Impact.

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located on-site.94 The nearest well is located 0.31 miles to the northeast of the site along Jade Street.95 In addition, according to the Significant Mineral Aggregate Resource Area (SMARA) study area maps prepared by the California Geological Survey, the Community of El Sereno is located within the larger San Fernando Valley P-C Region. However, as indicated in the Generalized Aggregate Resource Classification Map for the San Fernando Valley, the project site is not located in an area where there are significant aggregate resources present.96 In addition, the project site is not located in an area with active mineral extraction activities. Thus no impacts will result with the implementation of the proposed project.

B. Would the project 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? • No Impact.

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project site. Moreover, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.

4.11.3 Mitigation Measures

The analysis of potential impacts related to mineral resources indicated that no impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

4.12 Noise

4.12.1 Thresholds of Significance

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant impact on the environment if it would:

• Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

---


95 Ibid.

● Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;

● A substantial permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project;

● A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;

● 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 expose people residing or working in the project area to excessive noise levels; or,

● For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.

4.12.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ● Less than Significant Impact.

The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities. Noise may be generated from a point source, such as a piece of construction equipment, or from a line source, such as a road containing moving vehicles. Because the area of the sound wave increases as the sound gets further and further from the source, less energy strikes any given point over the surface area of the wave. This phenomenon is known as spreading loss. Due to spreading loss, noise decreases with distance.

The project site is located within an urbanized setting and the ambient noise characteristics reflect the surrounding urban environment. The predominant source of noise in the area is related to traffic on Marianna Avenue and Worth Street. A Westward Digital Sound Level Meter Model: 5URG5 (Type 2 meter) was used to conduct the noise measurements. The meter was performed using a slow response setting, with an “A” weighting. The meter’s height above the ground surface was five feet. A series of 100 discrete noise measurements were recorded at the southwest corner of the Marianna Avenue and Worth Street intersection. The duration of each measurement period was 15 minutes. The results of the survey are summarized in Table 4-6. The measurements were taken on a Friday morning at 11:45. The median ambient exterior noise level ($L_{50}$) was 63.3 dBA at the measurement location. The $L_{50}$ represents the noise level that is exceeded 50 percent of the time (half the time the noise level exceeds

---

Footnote:

this level and half the time the noise level is less than this level). As shown in Table 4-6, the average ambient noise level was 64.0 dBA.

Table 4-6
Noise Measurement Results

<table>
<thead>
<tr>
<th>Noise Metric</th>
<th>Noise Level (dBA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lmax (Maximum Noise Level)</td>
<td>72.3 dBA</td>
</tr>
<tr>
<td>L99 (Noise levels &lt;99% of time)</td>
<td>72.3 dBA</td>
</tr>
<tr>
<td>L90 (Noise levels &lt;90% of time)</td>
<td>70.2 dBA</td>
</tr>
<tr>
<td>L75 (Noise levels &lt;75% of time)</td>
<td>68.0 dBA</td>
</tr>
<tr>
<td>L50 (Noise levels &lt;50% of time)</td>
<td>63.3 dBA</td>
</tr>
<tr>
<td>Lmin (Minimum Noise Level)</td>
<td>50.8 dBA</td>
</tr>
<tr>
<td>Average Noise Level</td>
<td>64.0 dBA</td>
</tr>
</tbody>
</table>

Source: Blodgett Baylosis Environmental Planning.

Noise sensitive receptors in the immediate area include the apartments located to the east of the site approximately 86 feet from the project site across Marianna Avenue. There are a number of noise control regulations that are relevant to this project:

- **State of California Building Code.** The State of California has adopted noise standards in areas of regulation not preempted by the Federal government. The State standards regulate noise levels of motor vehicles, sound transmission through buildings, occupational noise control, and noise insulation. Title 24 of the California Code of Regulations, also known as the California Building Code, establishes building standards applicable to all occupancies throughout the State.

- **State of California General Plan Guidelines.** The California Governor’s Office of Planning and Research (OPR) provide guidance for the compatibility of projects within areas of specific noise exposure. The OPR Guidelines include a Noise and Land Use Compatibility Matrix that identifies acceptable and unacceptable community noise exposure limits for various land use categories.

- **California Environmental Quality Act.** The California Environmental Quality Act Guidelines establishes significance criteria related to noise. Roadway noise impacts would be considered significant if the project increases noise levels at a noise sensitive land use by 3.0 dBA CNEL and if: (1) the existing noise levels already exceed the residential land use compatibility standard for "normally acceptable" or (2) the project increases noise levels from below the 65 dBA CNEL standard to above 65 dBA CNEL. A substantial increase in noise levels due to stationary noise sources shall be considered 5.0 dBA Leq.

- **City of Los Angeles.** Chapter 11 – Noise Regulation of the City’s municipal code regulates the generation of noise within the City. The City has established the following ambient noise standards for residential uses: 50 dBA for the day and 40 dBA for the evening. The standards for commercial and manufacturing are 60 dBA during the day and 55 during the evening.
According to the City’s CEQA Threshold Guide, a project would normally have a significant impact on noise levels from construction if construction activities lasting more than ten days in a three month period would exceed existing ambient exterior noise levels by 5.0 dBA or more at a noise sensitive use. In addition to the aforementioned requirements, the City of Los Angeles established additional noise control requirements identified in Chapter 11 of the City’s municipal code. As indicated in the City’s CEQA Thresholds Guide, Noise levels 50 feet from a source decrease by approximately 3.0 dBA over a hard, unobstructed surface, such as asphalt, and by approximately 4.5 dBA over a soft surface, such as vegetation. For every doubling of distance thereafter, noise levels drop another 3.0 dBA over a hard surface and 4.5 dBA over a soft surface.

Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, roll-up doors, forklifts, and other equipment. Noise generated within the parking lot would include people shouting/laughing, which averages 64.5 dBA; car door slamming, which averages 62.5 dBA; car idling, which averages 61 dBA; car starting, which averages 59.5 dBA; and people talking, which averages 41 dBA. All of these averages were taken at a distance of 50 feet from the source. These distances represented the average distance from the noise source to the property line. This information is based on actual parking lot noise measurements taken by Blodgett Baylosis Environmental Planning.

The operation of the proposed project will not expose future employees to excessive noise levels because the project is not considered to be a noise sensitive land use. In addition, the operation of the facility will not expose the nearby sensitive receptors along the east side of Marianna Avenue to excessive noise since the loading docks will be provided along the building’s south facing elevation, oriented away from the aforementioned residential. Operational noise generated from the truck loading areas will also be reduced by the warehouse building since objects located within the line-of-sight between the source and a point will lead to the attenuation of noise. The southeast portion of the building will extend 87 feet beyond the dock doors, thereby screening the loading areas from the public right-of-way. The building itself may reduce noise levels generated within the loading areas by up to 13 dBA. The building’s exterior walls will mute any noise generated within the structure.

In addition, noise generated within the building will not affect the nearby sensitive receptors. According to the California Department of Transportation, concrete materials are able to attenuate noise by up to 36-40 dBA. The project will consist of a concrete tilt-up warehouse. The building’s exterior walls will mute any noise generated within the structure.

---

98 Based on our experiences collecting noise measurements from areas that are located within the line-of-site of a noise source and from areas whose line-of-sight with a noise source is obstructed by an existing building. The difference between the readings from the two different locations (taken within the same site or area) is calculated.

As noted previously, a project would normally have a significant impact on noise levels from construction if construction activities lasting more than ten days in a three month period would exceed existing ambient exterior noise levels by 5.0 dBA or more at a noise sensitive use. The average ambient noise level at the measurement location was 64 dBA. The project’s construction noise is expected to reach up to 75.5 dBA at the nearest sensitive receptor (un-mitigated). Mitigation measures are proposed in subsection 4.12.2.D that will reduce construction noise levels to an increase of under 5.0 dBA over the existing conditions. As a result, the potential impacts are considered to be less than significant.

B. Would the project result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? ● Less than Significant Impact.

The nearest land uses that may potentially be impacted from ground borne vibration and noise (primarily from the use of heavy construction equipment) are the residential units located along the east side of Marianna Avenue, opposite the project site. The noisiest phases of construction are anticipated to be 75.5 dBA (un-mitigated) as measured at a distance of 86 feet from the construction activity. The underlying fill soils will be removed and replaced to accommodate the new warehouse. This process will involve the use of excavators to remove the underlying fill; loaders to load asphalt, rocks, demolition debris, and dirt onto haul trucks; and haul trucks to transport construction and demolition waste. The project’s implementation will not require deep foundations since the underlying fill soils will be removed and the proposed warehouse will have a maximum height of 44 feet. The warehouse will be constructed over a shallow foundation that will extend no more than three to four feet bgs. The use of shallow foundations precludes the use of pile drivers or any auger type equipment.

Furthermore, the traffic associated with the proposed project will not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater). As a result, the traffic noise impacts resulting from the proposed project’s occupancy are deemed to be less than significant.

C. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? ● Less than Significant Impact.

The proposed project’s traffic would not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater). Noise emanating from the loading areas will be attenuated by the warehouse building and the retaining wall that will be installed along the east side of the project site. In addition, this operational noise will decrease in intensity as the distance between the noise source and the noise receptor increases.

Noise generated within the building will not affect the nearby sensitive receptors. According to the California Department of Transportation, concrete materials are able to attenuate noise by up to 36-40 dBA. The project will consist of a concrete tilt-up warehouse. The building’s exterior walls will mute
any noise generated within the structure. As a result, the potential impacts are considered to be less
than significant.

D. Would the project result in a substantial temporary or periodic increase in ambient noise levels in
the project vicinity above levels existing without the project? ● Less than Significant Impact with
Mitigation.

Composite construction noise is best characterized in a study prepared by Bolt, Beranek, and
Newman. In the aforementioned study, the noisiest phases of construction are anticipated to be 89
dBA as measured at a distance of 50 feet from the construction activity. This value takes into account
both the number of pieces and spacing of the heavy equipment typically used in a construction effort.
In later phases during building erection, noise levels are typically reduced from these values and the
physical structures further break up line-of-sight noise. In addition, the construction noise levels
would decline as one move away from the noise source in phenomenon known as spreading loss.
Noise subject to spreading loss experiences a 6.0 dBA reduction for every doubling of the distance
beginning with the initial 50-foot distance.

The City establishes permitted hours for construction/demolition. Construction is permitted from 7:00
AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM on Saturdays and National Holidays.
No work is permitted on Sundays. The City also indicates that:

“Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500
feet thereof, no person shall operate or cause to be operated any powered equipment or powered
hand tool that produces a maximum noise level exceeding the following noise limits at a distance
of 50 feet there from:

(a) 75 dB(A) for construction, industrial, and agricultural machinery including crawler-
tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor
graders, paving machines, off-highway trucks, ditches, trenchers, compactors, scrapers,
wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75 dB(A) for powered equipment of 20 HP or less intended for infrequent use in
residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dB(A) for powered equipment intended for repetitive use in residential areas,
including lawn mowers, backpack blowers, small lawn and garden tools and riding
tractors;”

The project’s construction noise levels were estimated using the Federal Highway Administration’s
(FHWA) Roadway Construction Noise Model Version 1.1. The pieces and number of equipment that
will be utilized was taken from the CalEEMod worksheets prepared for this project. The distance used
between the construction activity and the nearest sensitive receptors varied depending on the
individual equipment. The model assumes a recommended 5.0 dBA reduction for the wall that is

102 USEPA, Protective Noise Levels. 1971.
located along the west side of the existing sensitive receptors and an additional 4.0 dBA reduction based on spreading loss. As indicated by the model, the project’s construction will result in average ambient noise levels of up to 75.5 dBA at the nearest sensitive receptor.

According to the City’s CEQA Thresholds Guide, a project would normally have a significant impact on noise levels from construction if construction activities lasting more than ten days in a three month period would exceed existing ambient exterior noise levels by 5.0 dBA or more at a noise sensitive use. In addition, the City has a 75 dBA construction noise threshold at a distance of 50 feet for construction that takes place within 500 feet of a noise sensitive receptor.

The average ambient noise level at the measurement location was 64 dBA. The project’s construction noise is expected to reach up to 75.5 dBA at the nearest sensitive receptor (un-mitigated). Therefore, in order to reduce the increase in ambient noise levels to less than 5.0 dBA over the existing conditions (or less than 69 dBA), the following mitigation is required:

- The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment such as silencers and panels around the engine and vents as a means to reduce machinery noise. A Code Enforcement Officer must check and sign off on all construction equipment prior to the start of construction.

- Temporary noise barriers must be erected along the site’s eastern boundary. These sound barriers will be designed to attenuate construction noise. For this project, we are recommending plywood fencing or other sound attenuating materials like curtains.

The first mitigation measure calls for the use of sound suppressing equipment. For example, a typical excavator will produce noise levels of around 80.5 dBA at a distance of 50 feet. In the quietest configuration, with improved exhaust and intake muffling, fan disengaged, and three sound panels around the engine, the overall level was reduced to 71.5 dBA at a distance of 50 feet. Furthermore, regular maintenance of construction equipment will ensure noise levels do not increase over time.

The second mitigation measure recommends the use of sound barriers to reduce construction noise. A sound barrier composed of wood can reduce noise levels 8.0 dBA three feet from the source of noise. A sound barrier which includes acoustic curtains will further reduce construction noise. The use of acoustic curtains is an effective method of reducing noise levels. Based on our experience with acoustic curtains, noise reductions of up to 25.9 dBA may occur.

Adherence to the aforementioned mitigation will reduce potential impacts to levels that are less than significant.

---

104 Ibid.
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 expose people residing or working in the project area to excessive noise levels? • No Impact.

The project site is not located within two miles of an operational public airport. The nearest airport is San Gabriel Valley Airport, located approximately nine miles to the northeast. The site is not located within the airport’s 60 CNEL boundaries. As a result, the proposed project’s implementation would not expose future visitors and employees to excess aircraft noise and no impacts will occur.

F. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? • No Impact.

The project site is located 1.64 miles northeast of the University of Southern California University Hospital Heliport. Noise emanating from helicopters using the heliport will not affect the project due to the distance between the site and the heliport and an obstructed line of sight between the two areas. Therefore, no impacts will result.

4.12.3 MITIGATION MEASURES

The analysis of potential impacts related to noise indicated that the following mitigation will be required:

**Mitigation Measure No. 4 (Noise).** The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment such as silencers and barriers around vents as a means to reduce machinery noise. A Code Enforcement Officer must check and sign off on all construction equipment prior to the start of construction.

**Mitigation Measure No. 5 (Noise).** Temporary noise barriers must be erected along the site’s eastern boundary. These sound barriers will be designed to attenuate construction noise. For this project, we are recommending plywood fencing or other sound attenuating materials like curtains.

4.13 POPULATION & HOUSING

4.13.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant impact on housing and population if it would:

- Induce substantial 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);

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or,
• Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

4.13.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project induce substantial 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)? • No Impact.

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following: 105

• New development in an area presently undeveloped and economic factors which may influence development. The site is currently undeveloped; however, the site was occupied by a previous industrial use until 1995. In addition, the site is located in the midst of an urban area.

• Extension of roadways and other transportation facilities. The project will utilize the existing roadways, driveways, and sidewalks.

• Extension of infrastructure and other improvements. The project will utilize the existing infrastructure, though new utility lines (water line) will be installed. The installation of these new utility lines will not lead to subsequent development.

• Major off-site public projects (treatment plants, etc.). The project is a proposal to construct a warehouse. The project’s increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.

• The removal of housing requiring replacement housing elsewhere. The site is undeveloped and there are no housing units located on-site.

• Additional population growth leading to increased demand for goods and services. The project will not lead to any direct increase in the City’s population since no housing will be provided.

• Short-term growth-inducing impacts related to the project’s construction. The project will result in temporary employment during the construction phase.

The proposed project is an infill development that will utilize existing roadways and infrastructure. The new utility lines that will be provided will not extend into undeveloped areas and will not result in unplanned growth. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 Regional Transportation Plan (RTP), the City of Los Angeles is projected to add a total of 472,700 jobs through the year 2040.106 The employment increase of 32 persons that will result from the completion of the proposed project is well within SCAG’s growth forecast for the City of 472,700 jobs. As a result, no growth-inducing impacts will result from the proposed project’s implementation.

105 § 15126.2(d) – Consideration and Discussion of Significant Environmental Impacts of the CEQA Guidelines.

B. *Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? ● No Impact.*

No housing units will be displaced as a result of the proposed project’s implementation and no impacts will occur.

C. *Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? ● No Impact.*

As indicated in the previous section (Section 4.13.B), there are no dwelling units located on, or persons residing within, the boundaries of project site. In addition, there are no homes that would be dislocated as part of the proposed project’s implementation.

4.13.3 MITIGATION MEASURES

The analysis of potential population and housing impacts indicated that no significant impacts would result from the proposed project’s approval and subsequent implementation. As a result, no mitigation is required.

4.14 PUBLIC SERVICES

4.14.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services;

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services;

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services;
• Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks; or,

• Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other government services.

4.14.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services? • Less than Significant Impact.

The Los Angeles Fire Department (LAFD) provides fire protection service for the community of El Sereno. The LAFD’s 3,246 uniformed fire personnel are directly involved in fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service throughout the City. The Department also has 353 non-sworn professional support personnel that provide technical and administrative support. A total of 1,018 uniformed firefighters (including 270 serving as firefighters/paramedics), are always on duty at fire department facilities citywide, including 106 neighborhood fire stations strategically located across the Department’s 471 square-mile jurisdiction.107 LAFD Station 16 is the nearest first response station to the project site. This fire station is located 0.21 miles to the north of the project site on Eastern Avenue.108 The project’s site plan will undergo review by the City of Los Angeles Fire Department to ensure that the site and building design meet all applicable requirements of the Department. This site plan review is a standard procedure for City departments. The proposed project would not place additional demands on fire services since the project will involve the construction of modern structures that will be subject to all pertinent fire and building codes. As a result, the potential impacts will be less than significant.

B. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection? • No Impact.

The City of Los Angeles Police Department provides law enforcement services throughout the City. Currently, the police department is comprised of 10,000 sworn officers and 3,000 civilian employees. The closest first response station to the project site is the Hollenbeck Community Police Station located 2.24 miles to the southwest. The Hollenbeck Community Police Department serves the communities of Aliso Village, Boyle Heights, El Sereno, Estrada Court, Hermon, Hillside Village, Lincoln Heights, Montecito Heights, Monterey Hills, Pico Gardens, Ramona Gardens, Rose Hills Courts, and University Hills. The proposed project will involve the construction of a warehouse designed to store evidence and police vehicles/equipment. Forms of security include a state-of-the-art network of security cameras on the exterior and interior of the structure. These cameras will deter potential illegal activity and loitering to ensure employee and neighborhood safety. Sufficient lighting will also be provided. Access to the project site will be controlled by gates at every ingress/egress point. The inclusion of the aforementioned features will deter criminal activity. In addition, the facility will be occupied by the LAPD. The construction of additional space for the LAPD may be beneficial in that it could alleviate stress on police resources. As a result, no impacts will result.

C. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services? • No Impact.

The proposed project will not involve any development and/or uses that could potentially affect school enrollments. Moreover, the project Applicant will be required to pay mandatory development fees to the local school districts. As a result, no impacts on schools will result.

D. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks? • Less than Significant Impact.

The proposed project would not involve any development and/or uses that could potentially affect parks. However, the project may indirectly lead to an increase in population if future employees relocate to the City. Any impacts to parks and recreational facilities may be partially offset by the increase in the taxes and an increase in the assessed valuation of the property. Therefore, the potential

---


110 Los Angeles Police Department. Hollenbeck Community Police Station. http://www.lapdonline.org/hollenbeck_community_police_station
impacts are considered to be less than significant.

E. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other governmental services? • Less than Significant Impact.

No new governmental services will be needed, and the proposed project is not expected to have any impact on existing governmental services. The proposed project will not directly increase demand for governmental services. As a result, less than significant impacts are anticipated.

4.14.3 MITIGATION MEASURES

The analysis determined that the proposed project would not result in any significant impact on public services. As a result, no mitigation is required.

4.15 RECREATION

4.15.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on the environment if it:

• 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; or,

• 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.

3.15.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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? • No Impact.

The City of Los Angeles Parks and Recreation Department operates multiple parks and recreation facilities throughout the City. The nearest park is City Terrace Park, which is located 0.79 miles to the southeast of the project site. Due to the nature of the proposed project (LAPD evidence warehouse), no increase in the usage of parks and recreational facilities is anticipated to occur. As a result, no impacts will occur.

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?*  
- **No Impact.**

The proposed project will not result in a direct demand for park facilities. As a result, no changes in the demand for local parks and recreation facilities are anticipated and no impacts are anticipated. In addition, no recreational facilities are included with this project. Therefore, no impacts will result.

### 4.15.3 Mitigation Measures

The analysis determined that the proposed project would not result in any significant impact on recreational facilities and services. As a result, no mitigation is required.

### 4.16 Transportation & Circulation

#### 4.16.1 Thresholds of Significance

According to the City of Los Angeles, acting as Lead Agency, a project may have a significant adverse impact on traffic and circulation if it would:

- Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;

- 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;

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks;

- Substantially increases hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);

- Result in inadequate emergency access; or,

- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.
4.16.2 ANÁLISIS DE IMPACTOS AMBIENTALES

A. ¿El proyecto concursará con un plan, ordenanza o política aplicables que establezcan medidas de efectividad para el funcionamiento del sistema de circulación, tomando en cuenta todas las formas de transporte incluyendo el transporte público y el transporte no motorizado y los componentes relevantes del sistema de circulación, incluyendo pero no limitado a, intersecciones, calles, carreteras y autopistas, caminos peatonales y ciclistas, y transporte público? • Menos Impacto significativo.

El proyecto podría requerir un máximo de 1,970 camiones (suponiendo una capacidad de 20 yardas cúbicas). Mientras que la cantidad de importación y exportación aún no ha sido determinada, se preparó un escenario más desfavorable. Bajo un escenario más desfavorable, el proyecto requerirá la remoción de hasta 39,411 yardas cúbicas de suelo (suponiendo que toda la superficie fue excavada a una profundidad de 9 pies). Un estanque de tierra limpia está actualmente almacenado en el sitio. El uso de esta tierra limpia reducirá el número de viajes de camiones requeridos para importar nueva tierra limpia (suponiendo que no había un stock de tierra limpia) se requerirían 1,970 camiones adicionales para importar 39,411 yardas cúbicas de tierra limpia.) Es importante notar que la cantidad de tierra que se removerá no es aún conocida, se supuso el escenario más desfavorable. El número de camiones puede ser significativamente menor si la cantidad de tierra es menor que 39,411 yardas cúbicas.

Como se indicó anteriormente, el proyecto empleará un total de 32 personas. Además, hasta tres pequeños camiones visitarán el sitio diariamente y camiones semi-graneros viajarán al sitio dos a tres veces por semana. El proyecto permitirá el almacenamiento a largo plazo de los vehículos de la flota LAPD. Estos vehículos se quedan en el sitio y no viajan diariamente al sitio, lo que reduce el número total de viajes diarios. Se estima que el proyecto generará aproximadamente 67 viajes diarios (dos viajes por empleado más tres viajes diarios de camiones pequeños), siete viajes de los cuales ocurrirán durante la hora punta de la mañana y siete viajes de los cuales ocurrirán durante la hora punta de la tarde (se supone que 10% de los viajes diarios del proyecto ocurren durante la hora punta de la mañana y la hora punta de la tarde).

Según el Departamento de Transportación de Los Ángeles, se requiere un memorando técnico cuando el Proyecto de Desarrollo es probable que agregue 25 a 42 vehículos al a.m. o p.m. hora punta, y la intersección(s) adyacente(s) se estima que esté operando en UN E o F.112 El proyecto proponiendo no generará más de 25 vehículos al a.m. o p.m. hora punta, un memorando técnico no fue preparado. Adicionalmente, los siete viajes adicionales de la mañana y la tarde no degredarán el nivel de servicio para la intersección de Marianna Avenue y Worth Street. Como resultado, los impactos potenciales se consideran menos que significativos.

113 Blodgett Baylosis Environmental Planning. Site survey. Survey was conducted on May 17, 2018.
B. Would the project 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? ● No Impact.

The Los Angeles County Congestion Management Program (CMP) was developed in response to California Proposition 111, approved June 1990, and is intended to address regional congestion by linking land use, transportation, and air quality decisions. Among the elements of the CMP is a land use analysis program which "requires local jurisdictions to analyze the impacts of land use decisions on the regional transportation system, for projects preparing an Environmental Impact Report (EIR)."

The CMP document identifies the County's CMP System which includes arterial roadways and all freeways and requires that the traffic impact of individual development projects of potentially regional significance be analyzed. Per CMP guidelines, a traffic impact analysis is conducted where:

- At CMP arterial monitoring intersections, including freeway on-ramp or off-ramps, the proposed project will add 50 or more vehicle trips during either AM or PM peak weekday peak hours.

- At CMP mainline freeway monitoring locations, the proposed Project will add 150 or more vehicle trips, in either direction, during either AM or PM peak hours.

It is estimated that the project will generate approximately 67 daily trips (two trips per employee plus three daily small truck trips), seven trips of which will occur during the morning peak hour and seven trips of which will occur during the evening peak hour (this assumes that 10 percent of the project’s daily trips occur during the morning and evening peak hours). Since the proposed project generates fewer than 50 trips during both the AM and PM peak periods, no further analysis of CMP arterial facilities is required.

Based on the CMP, analysis of a project’s impact on a freeway segment would be required of any project that would add 150 trips or more in either direction during the AM or PM weekday peak hours. The nearest CMP mainline freeway monitoring locations are along Interstate 10 at East Los Angeles city limit (Station 1014) and at Atlantic Boulevard (Station 1015), and along Interstate 710 south of Route 60 (Station 1081).

Since the proposed project generates fewer than 150 trips during both the AM and PM peak periods, the project is projected to contribute fewer than 150 trips along I-10 and I-710 during either peak hour. Therefore, further analysis of CMP freeway facilities is not required for CMP purposes and no impacts to CMP facilities would occur.
C. **Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks?**  • No Impact.

The project site is not located within an approach or take-off aircraft safety zone for the San Gabriel Valley Airport or the University of Southern California University Hospital Heliport (refer to 4.12.2.E). As a result, no impacts are anticipated.

D. **Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**  • Less than Significant Impact with Mitigation.

A total of 237 parking spaces will be provided. Of the total number of spaces that will be provided, 16 will be located south of the warehouse building, 20 spaces will be located within the warehouse, and 201 spaces will be located on the roof. A ramp leading up to the rooftop parking area will be installed along the northeast corner of the building. The Applicant will also provide three dock high doors. Access to the proposed project will be provided by two driveway connections located along the north side of Worth Street. The driveways will provide access to the visitor parking area, the LAPD employee parking area, and main warehouse. A third driveway will function as a fire access lane. This fire access lane will extend along the building’s northern and western sides. The fire access lane will provide reciprocal access between the project and the future buildings that will be erected north of the evidence warehouse.

In addition, the Applicant will provide a two-foot street dedication along the west side of Marianna Avenue and a ten-foot street dedication along the north side of Worth Street. The addition of the aforementioned street dedications will improve visibility for drivers executing right or left-turns from Worth Street onto Marianna Avenue. However, additional mitigation is required to ensure that the new trees that will be placed do not obstruct the line-of-sight between vehicles turning onto Marianna Avenue and on-coming traffic. This mitigation is presented below:

- Landscaping must not block the line-of-sight between the intersection of Marianna Avenue/Worth Street and the northbound segment of Marianna Avenue. Trees, plants, and shrubs with dense branches will be prohibited from being planted along the site’s western boundaries. In addition, these tree branches must be regularly maintained to ensure they do not extend into the public right-of-way.

The intersection of Marianna Avenue and Worth Street is controlled by a single stop sign located on Worth Street. There is sufficient gap time between passing vehicles to safely execute right or left-turns. This conclusion is supported by the field survey that was undertaken for the project site. Since the project will not expose future employees to hazardous roadway conditions, the potential impacts are considered to be less than significant.

Lastly, the project will not result in incompatible uses. The project is an evidence warehouse and will be located within an existing industrial area. Despite the project’s nature as a warehouse, the occupant will not be involved in logistics/distribution. In addition, there will be a limited number of large trucks travelling to the site. Up to two to three large trucks will travel to the site on a weekly basis.
of the vehicles that will travel to the site will consist of passenger vehicles, tow trucks, and City fleet vehicles.

As stated earlier, the project’s construction may require up to 1,970 haul trucks (assuming a carrying capacity of 20 cubic yards). While the amount of import and export has not yet been determined, a worst case scenario was prepared. Under a worst case scenario, the project will require the removal of up to 39,411 cubic yards of earth (assuming the entire site was excavated to a depth of nine feet bgs). Given the amount of trucks that will be required, the project’s highest trip generation potential will be during the excavation phase. Potential safety hazards may arise in the absence of mitigation since trucks will be traveling to and from the site during the initial phases of construction and remediation. Therefore, mitigation measures are to reduce potential road hazardous generated by the use of trucks hauling earth and demolition debris from the project site:

- In order to ensure that construction vehicles do not interfere with vehicles parked along Worth Street, temporary no parking signs must be placed along the north side of Worth Street on days that trailer trucks will be utilized. The signs must be removed at the end of the construction day.

- In order to ensure that construction vehicles do not pose further risk to pedestrians and local vehicles, flag men must be stationed along Worth Street and Marianna Avenue to guide trucks driving down the street.

Adherence to the above-mentioned mitigation will reduce potential impacts to levels that are less than significant.

E. Would the project result in inadequate emergency access? • No Impact.

The project will not affect emergency access to any adjacent parcels. At no time will any local streets or parcels be closed to traffic. Construction staging and queuing will occur on-site. In addition, the extension of the water line may require the closure of a lane on Marianna Avenue. However, the single lane closure will not preclude use of the other lanes available on Marianna Avenue. As a result, the proposed project’s implementation will not result in any impacts.

F. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? • No Impact.

The project site is in close proximity to the Marianna Avenue/Worth Street stop. This stop is utilized by Metro Bus Line 254. This bus stop will not be impacted by the proposed project. Furthermore, the proposed project will not significantly affect patrons. There are no bicycle lanes located along Marianna Avenue or Worth Street. In addition, the project will not impact pedestrian facilities since the project will include new sidewalks. As a result, no impacts will result from the proposed project’s implementation.
4.16.3 Mitigation Measures

The analysis determined that the following mitigation is required to address potential safety issues:

*Mitigation Measure No. 6 (Transportation & Circulation).* Landscaping must not block the line-of-sight between the intersection of Marianna Avenue/Worth Street and the northbound segment of Marianna Avenue. Trees, plants, and shrubs with dense branches will be prohibited from being planted along the site's western boundaries. In addition, these tree branches must be regularly maintained to ensure they do not extend into the public right-of-way.

*Mitigation Measure No. 7 (Transportation & Circulation).* In order to ensure that construction vehicles do not interfere with vehicles parked along Worth Street, temporary no parking signs must be placed along the north side of Worth Street on days that trailer trucks will be utilized. The signs must be removed at the end of the construction day.

*Mitigation Measure No. 8 (Transportation & Circulation).* In order to ensure that construction vehicles do not pose further risk to pedestrians and local vehicles, flag men must be stationed along Worth Street and Marianna Avenue to guide trucks driving down the street.

4.17 Tribal Cultural Resources

4.17.1 Thresholds of Significance

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on tribal cultural resources if it results in any of the following:

- A substantial adverse change in the significance of a tribal cultural resources, 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 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,

- A substantial adverse change in the significance of a tribal cultural resources, 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 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.
4.17.2 Analysis of Environmental Impacts

A. Would the project cause a substantial adverse change in the significance of a tribal cultural resources, 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 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)? • Less than Significant Impact with Mitigation.

A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

- 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Formal Native American consultation has been initiated in accordance with AB-52. A list of tribes provided by the NAHC was consulted. A representative from the Gabrieleno Kizh indicated that the standard condition provided in subsection 4.5.2.B will be sufficient and that the tribe should be notified if any remains are encountered the project will require mitigation since there is a potential to encounter Tribal Cultural Resources. AB-52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation.

The project site is located within an urbanized area of the City that has been disturbed due to past development and there is a limited likelihood that artifacts will be encountered. The grading and excavation will involve the installation of the new building footings and utility connections. In addition, the project area is not located within an area that is typically associated with habitation sites,
foraging areas, ceremonial sites, or burials. Nevertheless, the project Applicant will be required to adhere to the standard conditions outlined in subsection 4.5.2.B. No mitigation is required since these conditions provide specific instructions to address any possible scenario that may arise during the project’s construction phase. Should any remains be encountered on-site, all construction must cease the mitigation measures provided by the Gabrielino Kizh. These mitigation measures are described below:

- The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC’s Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day’s activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

- Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a “historical resource” or “unique archaeological resource”, time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.
Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.

Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).

If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all
material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

- Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

As a result, the potential impacts are considered to be less than significant. Adherence to the above-mentioned mitigation measures will reduce potential impacts to levels that are less than significant.

B. Would the project cause a substantial adverse change in the significance of a tribal cultural resources, 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 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? • Less than Significant Impact.

Formal Native American consultation has been initiated in accordance with AB-52. AB-52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation.

The project site is located within an urbanized area of the City that has been disturbed due to past development and there is a limited likelihood that artifacts will be encountered. The grading and excavation will involve the installation of the new building footings and utility connections. In addition, the project area is not located within an area that is typically associated with habitation sites, foraging areas, ceremonial sites, or burials. Nevertheless, the project Applicant will be required to adhere to the standard conditions outlined in subsection 4.5.2.B. No mitigation is required since these conditions provide specific instructions to address any possible scenario that may arise during the
project’s construction phase. Should any remains be encountered on-site, all construction must cease mitigation measures provided in the previous subsection. As a result, the potential impacts are considered to be less than significant.

4.17.3 MITIGATION MEASURES

The analysis of tribal cultural resources indicated that no significant impacts would result with the implementation of the proposed project. As a result, no mitigation is required. The following mitigation measures required pursuant to AB-52 consultation with the Gabrielino Kizh:

Mitigation Measure No. 9 (Tribal Cultural Resources). The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC’s Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day’s activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

Mitigation Measure No. 10 (Tribal Cultural Resources). Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a “historical resource” or “unique archaeological resource”, time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los
Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

**Mitigation Measure No. 11 (Tribal Cultural Resources).** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.

**Mitigation Measure No. 12 (Tribal Cultural Resources).** Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).

**Mitigation Measure No. 13 (Tribal Cultural Resources).** If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

**Mitigation Measure No. 14 (Tribal Cultural Resources).** Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and
respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

**Mitigation Measure No. 15 (Tribal Cultural Resources).** Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

### 4.18 UTILITIES & SERVICE SYSTEMS

#### 4.18.1 Thresholds of Significance

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on utilities if it would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;

- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;

- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;

- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed;
• 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;

• Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs; or,

• Comply with federal, state, and local statutes and regulations related to solid waste.

4.18.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? ● Less than Significant Impact.

The City operates more than 6,700 miles of public sewers that convey about 400 million gallons per day (MGD) of flow from residences and businesses to the City’s four wastewater treatment and water reclamation plants. The community of El Sereno is located within the service boundaries of the Hyperion Treatment Plant. The Hyperion Water Reclamation Plant is the City’s oldest and largest wastewater treatment facility. The plant has been operating since 1894. The plant has been expanded and improved numerous times over the last 100 plus years. On average 275 million gallons of wastewater enters the Hyperion Water Reclamation Plant on a dry weather day.114 Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons of water per day (MGD) and peak wet weather flow of 800 MGD. The Hyperion Water Reclamation Plant provides primary and secondary treatment.115 Table 4-7 indicates the future wastewater generation in gallons per day. According to Table 4-7, the proposed project is expected to generate approximately 1,600 gallons of sewage per day, which is well within the daily average totals for the Hyperion Water Reclamation Plant.

<table>
<thead>
<tr>
<th>Use</th>
<th>Unit</th>
<th>Factor</th>
<th>Generation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Warehousing and mezzanine</td>
<td>80,000 sq. ft.</td>
<td>20 gallons/1,000 sq. ft./day</td>
<td>1,600 gals/day</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>80,000 sq. ft.</td>
<td></td>
<td>1,600 gals/day</td>
</tr>
</tbody>
</table>

Source: City of Los Angeles CEQA Thresholds Guide

The proposed project will connect to an existing eight inch sewer line located within Worth Street. Adequate sewage collection and treatment are currently available. In addition, the new plumbing fixtures that will be installed will consist of water conserving fixtures as is required by the current City Code requirements, no new or expanded sewage and/or water treatment facilities will be required to accommodate the proposed project; as a result, the impacts are expected to be less than significant.


115 Ibid.
B. **Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?** ● Less than Significant Impact.

According to Table 4-7, the proposed project is expected to generate approximately 1,600 gallons of sewage per day, which is well within the daily average totals for the Hyperion Water Reclamation Plant. In addition, the future wastewater generation would be within the treatment capacity of the aforementioned Water Reclamation Plant (WRP). Therefore, the project’s implementation would not require the expansion of existing wastewater treatment facilities or the construction of new wastewater treatment facilities.

The project will also require the extension of an off-site water line to the project site. The extension of the line will serve the entire 6.6-acre site (recall that this larger 6.6-acre site will be subdivided and the LAPD evidence warehouse project will be located on a 2.94-acre parcel. The site is not currently served by the Los Angeles Department of Water and Power and no City-owned water line connections exist in the immediate area. The project cannot connect to the water lines located to the south of the site since these lines serve the unincorporated portions of Los Angeles County. Therefore, a water line from the north will be extended to the project site. The extension of a City water line will necessitate the closure of a lane along Marianna Avenue to accommodate the trenching. The extension of the water line will also include the installation of two lateral lines (one for each parcel). The lateral line that will serve the project may connect to the northeast corner of the building, just south of the driveway that provides access to the roof.

The proposed project would be constructed in compliance with the 2016 California Green Building Code (Part 11 of Title 24 of the California Code of Regulations). More specifically, the project must comply with Division 5.3, Water Efficiency, and Conservation, which mandates the inclusion of water efficient fixtures such as faucets, toilets, showers, food waste disposers, and water efficient landscaping. Compliance with the aforementioned requirements will reduce potential impacts to levels that are less than significant since these water efficient fixtures reduce water consumption over previous less-efficient models.

C. **Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?** ● Less than Significant Impact.

The City of Los Angeles is served by the Los Angeles County Flood Control District which operates and maintains regional and municipal storm drainage facilities. The City works with the Flood Control District in making local drainage plans and improvements. The project will increase the amount of impervious surfaces on-site. As a result, the increase in the amount of impervious surfaces may lead to an increase in the quantity of stormwater runoff. Additionally, the future impervious surfaces (the new building foot-print, parking areas, etc.) that will be constructed as part of the site’s development could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants within the parking areas. These pollutants may enter the storm drain system during periods of rainfall.
Once constructed, the project will not introduce polluted runoff into the existing storm drain system. In addition, the project will not create excess runoff that will exceed the capacity of the existing storm water drainage system. The project Applicant will be required to prepare a LID report which will recommend the installation of specific operational BMPs. The Applicant will also be required to implement various construction Best Management Practices (BMPs) to prevent runoff contamination. The addition of the runoff controls would ease the potential strain placed on the existing system by excess runoff because the above-mentioned runoff controls would limit the amount the water that would be discharged. As a result, the impacts will be less than significant.

D. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? ● Less than Significant Impact.

The City of Los Angeles is served by the Los Angeles Department of Water and Power, which covers a 469 square mile area and provides over 3.9 million residents with water. Water distributed by the Los Angeles Department of Water and Power (LADWP) is sourced by the Los Angeles Aqueduct, local groundwater, recycled water, and water purchased from the Metropolitan Water District.116 The project is expected to consume approximately 1,920 gallons of water per day (refer to Table 4-8).

### Table 4-8

<table>
<thead>
<tr>
<th>Use</th>
<th>Unit Factor Generation</th>
<th>Generation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Warehousing and mezzanine</td>
<td>80,000 sq. ft.</td>
<td>24 gallons/1,000 sq. ft./day</td>
</tr>
<tr>
<td>Total</td>
<td>80,000 sq. ft.</td>
<td>1,920 gals/day</td>
</tr>
</tbody>
</table>

Source: City of Los Angeles CEQA Thresholds Guide

According to the 2015 Urban Water Management Plan, the total amount of available water is projected to be 642,400 acre-feet. Demand is projected to equal supplies by 2020.117 However, the Mayor introduced a plan to reduce demand to 485,600 acre-feet by 2020. The Mayor’s plan to reduce citywide demand for water was created in response to the prolonged drought that affected the State over the past six years. The LAPD evidence warehouse will be equipped with water efficient fixtures and drought tolerant landscaping will be planted throughout the project site.

The project will also require the extension of an off-site water line to the project site. The extension of the line will serve the entire 6.6-acre site (recall that this larger 6.6-acre site will be subdivided and the LAPD evidence warehouse project will be located on a 2.94-acre parcel. There are no plans to develop the north parcel site in the near future and thus there are also no plans to install services at that that site. However, the same lines used to service the south parcel would be used to serve the north parcel, if development occurs in the future. The north property is unrelated to and not subject to the purchase and sale agreement with the City. However, it is associated with the subdivision processes for the south parcel’s boundary adjustment. Any environmental impacts associated with the north parcel would be

---

https://www.ladwp.com/ladwp/faces/ladwp/aboutus

117 Ibid.
speculative at this time since it is anticipated that after that adjustment, the north parcel will remain undeveloped with no specific foreseeable plans for development. Once an application is submitted for a development proposal within the aforementioned north parcel, if any such application is so submitted, the project related to that proposal will be required to undergo its own public review.

The site is not currently served by the Los Angeles Department of Water and Power and no City-owned water line connections exist in the immediate area. The project cannot connect to the water lines located to the south of the site since these lines serve the unincorporated portions of Los Angeles County. Therefore, a water line from the north will be extended to the project site. The extension of a City water line will necessitate the closure of a lane along Marianna Avenue to accommodate the trenching. The extension of the water line will also include the installation of two lateral lines (one for each parcel). The lateral line that will serve the project may connect to the northeast corner of the building, just south of the driveway that provides access to the roof. As a result, the impacts are considered to be less than significant.

E. Would the project 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? • Less than Significant Impact.

According to Table 4-7, the proposed project is expected to generate approximately 1,600 gallons of sewage per day, which is well within the daily average totals for the Hyperion Water Reclamation Plant. In addition, the future wastewater generation would be within the treatment capacity of the aforementioned Water Reclamation Plant (WRP). Therefore, the project’s implementation would not require the expansion of existing wastewater treatment facilities or the construction of new wastewater treatment facilities. As a result, less than significant impacts will occur.

F. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs? • Less than Significant Impact.

Waste hauling services are provided by the Los Angeles Bureau of Sanitation. Waste collected by the Los Angeles Bureau of Sanitation is taken to the Central Los Angeles Recycling and Transfer Station (CLARTS). The CLARTS has a present capacity of 2,500 tons per day and a permitted capacity 4,025 tons per day. The CLARTS has a remaining capacity of 1,525 tons per day.118 According to screening criteria used by the City of Los Angeles Planning Department, a project will potentially have a significant impact on solid waste generation if it generates in excess of five tons of solid waste per day. The project is anticipated to generate approximately 438 pounds of solid waste per day. This increase of 438 pounds per day is within the remaining capacity of the CLARTS. As a result, the potential impacts are considered to be less than significant.

---

118 City of Los Angeles, Sanitation Department. CLARTS Facts & Services https://www.lacitysan.org/san/faces/home/portal.
G. Comply with federal, state, and local statutes and regulations related to solid waste? • No Impact.

The proposed use, like all other development in the City, would be required to adhere to all pertinent ordinances related to waste reduction and recycling. As a result, no impacts on the existing regulations pertaining to solid waste generation would result from the proposed project’s implementation.

4.18.3 Mitigation Measures

The analysis of utilities impacts indicated that no significant impacts would result from the proposed project’s approval and subsequent implementation. As a result, no mitigation is required.

4.19 Mandatory Findings of Significance

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

- Does the project have the potential to 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, 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?

The proposed project will not have the potential to degrade the quality of the environment since the project’s air quality emissions will be below the thresholds of significance outlined by the SCAQMD. No impacts to protected species or habitat will result with the implementation of the proposed project. The site is vacant and undeveloped and does not exhibit any historical value. Furthermore, the best management practices identified in the preliminary LID will filter out contaminants of concern present in stormwater runoff. The addition of project trips will not negatively impact any local intersection.

- 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)?

Air Quality, greenhouse gas emissions, traffic, and utilities are issue areas that are considered to be both site-specific and cumulative. According to Section 15130(B) of the CEQA Guidelines, lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used. The City’s CEQA Thresholds Guide presents a method to evaluate cumulative impacts, based on either a related projects list or a planned development approach (the amount of overall growth expected for the project area, according to planning documents or forecasts, by the time of project completion). The methodology describes only the type of analysis that is appropriate and does not address the size or location of related projects to consider in the analysis. As a result, related projects processed by both the Planning Department and
the BOE within Council District 14 during the past year were considered in the analysis. The following related projects were considered:

- An eight-story mixed-use development located 3.53 miles to the southwest of the site at 1100 East 5th Street (Planning Department);

- A 15-story mixed-use development located 3.45 miles to the southwest of the site at 2117-2147 East Violet Street (Planning Department);

- A 64-story mixed-use development located 4.79 miles to the southwest of the site at 945 W. 8th Street (Planning Department);

- A 70-story mixed-use development located 4.80 miles to the southwest of the site at 1033-1057 South Olive Street, (Planning Department);

- A 51-unit affordable housing development located 3.72 miles to the southwest of the site at 713 East Street (Planning Department);

Related projects within District 14 were analyzed since the project site is located within District 14. The combined air quality emissions from the five related projects as well as the proposed project will not lead to the generation of a CO hot-spot. The five related projects are located over three miles away from the proposed project and are separated by the built-out environment which includes multiple freeways such as the I-5, US 101, and I-10. The number of trips that will be added to the intersection of Marianna Avenue and Worth Street by the five related projects will be negligible. The lack of trips at this intersection from the five related projects precludes the formation of a CO hot-spot or the degradation of the intersection’s LOS on a cumulative basis.

The proposed project, in addition to the five related projects, is considered to be an infill development, which is seen as an important strategy in combating the release of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State’s Strategic Growth Council (SGC). Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas. In addition, the proposed project will include four EV charging stations, energy efficient fixtures, and connections for future solar panels. Since the proposed development will ultimately be purchased and occupied by the LAPD, many of the fleet vehicles that will travel to and from the site will be required to comply with the City’s efforts to modernize their fleet vehicles. The use of energy and water efficient fixtures and appliances, inclusion of solar panel connections, and modernization of City fleet vehicles with low or zero-emission vehicles will help reduce the project’s air quality and greenhouse gas emissions.

The cumulative noise impacts will not be cumulatively considerable since the five related projects are located over three miles away from the proposed project and are separated by the built-out environment which includes multiple freeways such as the I-5, US 101, and I-10. The overall increase in City-wide noise levels will be minimal since noise impacts tend to subside as the distance from the noise source increases.
Finally, the project and five related projects will increase the use of utility services such as water and sewer services. The cumulative impacts related to utility services have been analyzed in the environmental documents that were prepared for each project. All six projects (including the proposed project) will be constructed in accordance with the California Green Building Code (Title 24). These projects will include water and energy efficient fixtures. Furthermore, the implementation of the mitigation measures provided throughout Section 4 will ensure the project’s cumulative impacts are not considered to be cumulatively considerable.

- *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Due to the nature of the proposed project (an evidence warehouse for the LAPD), biological waste maybe generated as part of the daily operations. This waste will be properly secured and disposed of into bio-hazard disposal bins. In addition, the project will include emergency eyewash stations and specialized lockers for securing hazardous and biological materials.
THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.
5. **MITIGATION MEASURES**

The following mitigation measures form the foundation of a mitigation monitoring program (MMP) for the proposed project (which is provided as a standalone document). CEQA requires public agencies to adopt a reporting or monitoring program for the changes to the project that have been adopted to mitigate or avoid significant effects on the environment (Public Resources Code Section 21081.6). The program must be adopted by the public agency at the time findings are made regarding the project. The State CEQA Guidelines allow public agencies to choose whether its program will monitor mitigation, report on mitigation, or both (14 CCR Section 15097(c)).

The mitigation measures described herein are supplemental to those required as standard procedure for the City and its contractors. The City and its contractors are the parties responsible for: the necessary implementing actions; verifying that the necessary implementing actions are taken; and the primary record documenting the necessary implementing actions.

The mechanisms for verifying that mitigation measures have been implemented are presented in the (MMP), which is a separate document. The MMP was prepared in accordance with Public Resources Code 21081.6. These mechanisms include design drawings, project plans, and specifications, construction documents intended for use by construction contractors and construction managers, and field inspections. All records pertaining to the separate MMP will be maintained and made available for inspection by the public in accordance with the City's records management systems.

The analysis of air quality impacts indicated that the proposed project will not result in significant air quality impacts with the implementation of the following mitigation:

**Mitigation Measure No. 1 (Air Quality).** The project Applicant must obtain a sign from the SCAQMD identifying the number local residents can call to file a complaint regarding fugitive dust emissions. This sign must be placed along the east side of the project site and must remain posted for the duration of the construction period.

The analysis of biological resources impacts indicated that the proposed project may have the potential to impact nesting avian species. The project’s implementation will require the removal of the mature street trees located adjacent to the project site’s eastern property line along the west side of Marianna Avenue. Avian species may be present within these trees during the migratory bird nesting season. Therefore, the following mitigation is required:

**Mitigation Measure No. 2 (Biological Resources).** If clearing and/or construction activities would occur during the raptor or migratory bird nesting season (February 15 to August 15), the Applicant and/or its contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before the construction activities commence. The qualified biologist shall survey the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season. If active nest(s) are
identified during the preconstruction survey, a qualified biologist shall establish a 100-foot no-
activity setback for migratory bird nests and a 250-foot setback for raptor nests. No ground
disturbance should occur within the no-activity setback until the nest is deemed inactive by the
qualified biologist.

The analysis of hazards and hazardous materials indicated that the following mitigation measure would
be required:

*Mitigation Measure No. 3 (Hazards & Hazardous Materials).* In the event remediation of any
contamination on the land and/or the adjacent development property is necessary for the
Applicant to construct and complete the project for the intended future use of the project, as
specified in Section 6.1.1 of the Purchase and Sale agreement, such remediation shall not be
considered a Buyer-proposed Change Order, and the Applicant (Seller), at its cost and expense,
shall be solely responsible for such remediation work in connection with the construction of the
project, which shall be diligently completed in compliance with all applicable regulations and
requirements in all material respects and shall receive all applicable regulatory sign-off prior to
closing. Any required remediation shall have an associated soil management plan (SMP),
a remedial action plan (RAP), and human health risk assessment (HHRA) prepared. Contaminants
to be remediated upon discovery include but are not limited to: Volatile Organic Compounds
(VOCs) in soil and soil gas as well as Polycyclic Aromatic Hydrocarbons (in soil), Semi Volatile
Organic Compounds (in soil), Polychlorinated Biphenyls (in soil), metals (in soil), and total
petroleum hydrocarbons (in soil). In the event other contaminants are encountered in soil, soil
gas, or groundwater during construction or during the City’s Phase II sub-surface investigation,
those contaminants shall be remediated to appropriate thresholds. A contingency plan
for identifying, handling, and disposing of contaminated material shall be in accordance with
applicable laws, regulations, ordinances, and formally adopted City standards. The plan describes
measures that apply to handling and disposing of stained or hydrocarbon-contaminated and other
contaminated soils should they be encountered during site excavations. These measures will
reduce hazards to people or the environment from exposure to hazardous materials to a less-than-
significant level. Specifically, the plan shall address, but not be limited to, the following:

- Excavation of Contaminated Soils

  - The soils that have visible staining or an odor must be tested in the field by the
    contractor or qualified environmental subcontractor with an organic vapor analyzer
    (OVA) for volatile components, which require additional considerations in their
    handling. Soils with OVA readings exceeding 50 ppm volatile organic compounds (probe
    held 3 inches from the excavated soil face), or that are visibly stained or have a detectable
    petrochemical odor should be stockpiled by the Contractor separately from
    uncontaminated soils. The stockpiles should be barricaded near the excavation area,
    away from drainage areas or catch basins, on an impermeable plastic liner (6 millimeter
    nominal thickness and tested at 100 psi strength). Caution must be taken to separate any
    contaminated soil from the remainder of the excavated material. If only a small amount
of contaminated soil is encountered, it may be drummed in 55-gallon steel drums with sealing lids. The soil will then be sampled in a random and representative manner. To establish waste classification, samples will then be analyzed for Total Recoverable Petroleum Hydrocarbons (TRP H), volatile organics (VOC), Semi-volatile Organic Compounds, Title 22 heavy metals, reactivity (pH), corrosivity, and toxicity. The number of samples will depend on the volume of material removed, one sample for approximately every ton of soil. Storage space available at the site and neighborhood sensitivity will determine the amount of soil that can be stockpiled.

- If volatile compounds are present at concentrations exceeding 50 ppm, an AQMD permit will be required, which most likely will require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution. The Contractor shall obtain all permits.

- Suspected contaminated soil samples can be taken to a State-certified environmental laboratory or tested in the field with a mobile lab and technician using infrared spectrometry with EPA Method 1664 for TRPH. Materials with elevated levels of TRPH, metals or other regulated contaminants will require handling by workers who have been adequately trained for health and safety aspects of hazardous material handling.

- Removal and Classification of Excavated Soil

- Any contaminated material (soil, asphalt, brick, burned material, concrete, or debris) that is to be hauled off the site is considered a "waste product" and must be classified as hazardous or nonhazardous waste under all criteria by both state and federal Codes prior to disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest will prepared by the Contractor or its qualified representative and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels that can be returned to the excavation, a less costly nonhazardous transporter and soil recycling facility may be used if no hazardous constituents are present above their respective action levels.

- Currently, there are no established regulatory limits or threshold values whereby soil with TRP H only can be classified as hazardous, although the California Code of Regulations (CCR) Title 22 provides limits for the volatile hydrocarbon constituents (including solvents), PCBs, and metals. Therefore, until new criteria are released by the state or federal agencies, soil levels of 100 ppm TRPH (crude oil, waste oil, and diesel), 10 ppm gasoline, and 1/50/50/50/ ppm benzene, toluene, ethylbenzene and xylenes, respectively, are proposed. Soil contaminated with hydrocarbons at values less than these values may be backfilled, used for fill, or paved over. A soil recycling facility should accept the material containing TRPH, assuming it is not hazardous due to metals or other contaminants.
Depending on the results of the sampling, this soil material is recycled into building foundation material, road pavement, landfill cover, etc. A Class III (municipal) landfill may also accept soils with only TRPH contamination above 1,000 mg/Kg at the facility's discretion, but below certain levels specified by the Los Angeles Regional Water Quality Control Board, upon approval of an application (Report of Waste Discharge) with that agency. All excavated material moved off site must be manifested, transported by a registered hauler, and disposed of in the proper class landfill or recycler. These facilities can be contacted ahead of time regarding their acceptance of SVOCs.

Health and Safety Issues

The contractor shall be licensed for hazardous materials handling and hauling or have a qualified licensed subcontractor on call. The workers exposed to or handling contaminated soils shall have sufficient health and safety training, consistent with OSHA Hazardous Waste Operation Standards (29 CFR 1910.120), and Cal-OSHA "Hazardous Waste Operations & Emergency Response" (8 CCR 5192).

The contractor, qualified subcontractor or an industrial hygienist shall prepare a site-specific health and safety plan. The plan shall appoint a site safety officer and establish responses (but not limited to) to heavy metals, solvents, SVOCs, and petroleum hydrocarbons that may be encountered during excavations. Trapped pockets of methane and hydrogen sulfide gas and areas of low oxygen are common in excavations of this area, and are usually mitigated in confined excavations with proper monitoring and ventilation. The plan should specify particular action levels for each contaminant found during exploratory drilling and suspected to occur along the alignment and provide guidelines for personal safety and public protection, including monitoring and appropriate personal protective equipment needed on the jobsite during all phases of excavation of the project. The responsibility for maintenance and calibration of monitoring gear should be specified. The goal is to prevent health-significant inhalation and dermal exposure to hydrocarbon SVOC- or metal-contaminated soils, explosions, and fires and to provide methods of decontaminating workers and equipment if contamination levels exceed those cited in the plan. Preventing unauthorized entry into the work and stockpile areas shall be included.

The analysis of potential impacts related to noise indicated that the following mitigation will be required:

**Mitigation Measure No. 4 (Noise).** The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment such as silencers and barriers around vents as a means to reduce machinery noise. A Code Enforcement Officer must check and sign off on all construction equipment prior to the start of construction.
Mitigation Measure No. 5 (Noise). Temporary noise barriers must be erected along the site’s eastern boundary. These sound barriers will be designed to attenuate construction noise. For this project, we are recommending plywood fencing or other sound attenuating materials like curtains.

The analysis determined that the following mitigation is required to address potential safety issues:

Mitigation Measure No. 6 (Transportation & Circulation). Landscaping must not block the line-of-sight between the intersection of Marianna Avenue/Worth Street and the northbound segment of Marianna Avenue. Trees, plants, and shrubs with dense branches will be prohibited from being planted along the site’s western boundaries. In addition, these tree branches must be regularly maintained to ensure they do not extend into the public right-of-way.

Mitigation Measure No. 7 (Transportation & Circulation). In order to ensure that construction vehicles do not interfere with vehicles parked along Worth Street, temporary no parking signs must be placed along the north side of Worth Street on days that trailer trucks will be utilized. The signs must be removed at the end of the construction day.

Mitigation Measure No. 8 (Transportation & Circulation). In order to ensure that construction vehicles do not pose further risk to pedestrians and local vehicles, flag men must be stationed along Worth Street and Marianna Avenue to guide trucks driving down the street.

The analysis determined that the following mitigation is required pursuant to AB-52 consultation with the Gabriélino Kizh:

Mitigation Measure No. 9 (Tribal Cultural Resources). The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabriélino Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC’s Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabriélino Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day’s activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

Mitigation Measure No. 10 (Tribal Cultural Resources). Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabriélino Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the
Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5(f)). If a resource is determined by the qualified archaeologist to constitute a “historical resource” or “unique archaeological resource”, time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

**Mitigation Measure No. 11 (Tribal Cultural Resources).** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.

**Mitigation Measure No. 12 (Tribal Cultural Resources).** Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).

**Mitigation Measure No. 13 (Tribal Cultural Resources).** If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary
objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

**Mitigation Measure No. 14 (Tribal Cultural Resources).** Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

**Mitigation Measure No. 15 (Tribal Cultural Resources).** Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.
6. PREPARATION AND CONSULTATION

6.1. PREPARERS

Blodgett Baylosis Environmental Planning
2211 South Hacienda Boulevard, Suite 107
Hacienda Heights, CA 91745
(626) 336-0033

Marc Blodgett, Project Manager
Bryan Hamilton, Project Planner
Liesl Sullano, Project Planner

6.2. CONSULTATION

Maria Martin, Environmental Management Group Manager
Los Angeles Department of Public Works Bureau of Engineering
1149 South Broadway, Suite 600
Los Angeles, California 90015
maria.martin@lacity.org

Talmage Maxwell Jordan, Environmental Specialist II
Los Angeles Department of Public Works Bureau of Engineering
1149 South Broadway, Suite 600
Los Angeles, California 90015
talmage.jordan@lacity.org
THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.
7. CONCLUSION

7.1 CONCLUSION

The Initial Study determined that the proposed project is not expected to have significant environmental impacts, with the implementation of the mitigation measures identified in Sections 4 and 5. The following findings can be made regarding the mandatory findings of significance set forth in Section 15065 of the CEQA Guidelines based on the results of this initial study:

- The proposed project will not have the potential to degrade the quality of the environment.
- The proposed project will not have the potential to achieve short term goals to the disadvantage of long-term environmental goals.
- The proposed project will not have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity.
- The proposed project will not have environmental effects that will adversely affect humans, either directly or indirectly.

In addition, pursuant to Section 21080(c)(2) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Negative Declaration, which relates to the Mitigation Monitoring Program. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB 3180 and in compliance with the requirements of the Public Resources Code. A Mitigation Reporting Program (MMP) will be required and was prepared as a separate document.

7.2. RECOMMENDED ENVIRONMENTAL DOCUMENTATION

On the basis of this initial evaluation, I find that the proposed project could not have a significant effect on the environment. Therefore, a Mitigated Negative Declaration will be prepared. A second environmental document will be prepared for the north parcel once a development proposal is submitted to the City.

Prepared By:

Bryan Hamilton, Project Planner
Blodgett Baylosis Environmental Planning
2211 South Hacienda Boulevard, Suite 107
Hacienda Heights, CA 91745
Approved By:

Maria Martin
Environmental Affairs Officer
Department of Public Works
Bureau of Engineering
8. REFERENCES


California Department of Fish and Wildlife, *Natural Diversity Database*.

California Division of Mines and Geology, *Seismic Hazards Mapping Program*.

California Department of Parks and Recreation, *California Historical Landmarks*.


Los Angeles, City of. *Zoning and Land Information Data (ZIMAS)*.

Los Angeles, City of. *Los Angeles General Plan*.

Los Angeles, City of. *Zoning Ordinance*.


THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.
9. PUBLIC REVIEW COMMENTS AND RESPONSE TO COMMENTS

The City circulated the Mitigated Negative Declaration and Initial Study for a 20-day review period from September 6th, 2018 until September 26th, 2018. Comments were received from the following individual during the review period:

   Email Dated September 13, 2018
   Mirna Lazo

   Email Dated September 13, 2018
   Mirna Lazo

Comment 1.

I believe that could be a good project as long as the lot is occupied. Right now it has been sitting for more than 25 years.

Response 1.

This comment has been noted for the record.

The City recirculated a Revised Mitigated Negative Declaration and Initial Study for a 20-day review period from October 11th, 2018 until October 31st, 2018. No comments were received during the review period.