GEN. FORM 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: October 12, 2021

To: Municipal Facilities Committee

From: Barbara Romero,
Director and General Manager
LA Sanitation and Environment

Subject: **STATUS REPORT REGARDING THE CLEAN WATER CAMPUS (CWC) PROJECT AND PROCUREMENT OF PROPERTY LOCATED AT 323 N. SAN FERNANDO ROAD, CONSIDERATION AND SELECTION OF PREFERRED ADDITIONAL PARKING OPTION, IDENTIFICATION OF FUNDING SOURCE FOR ADDITIONAL PARKING OPTION SELECTED, ADDENDUM TO CORNFIELD ARROYO SECO SPECIFIC PLAN ENVIRONMENTAL IMPACT REPORT, SCH NUMBER 2009031002 (FEIR) AND RELATED CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) RECOMMENDATIONS, AND RE-AFFIRMATION OF JUNE 16, 2021 CITY COUNCIL ACTION RELATIVE TO LAND ACQUISITION RELATED TO THE CWC (Council File No. 18-0555)**

LASAN is providing this report on the status of the above-referenced matter, and specifically is communicating the indicative pricing information for an additional 200 parking stalls that may be included as part of the Clean Water Campus (CWC) Project.

The purpose of providing the additional parking indicative pricing for four different options is for the City Council to determine whether the additional 200 parking spaces (Additional Parking) can be funded and constructed as part of the CWC Project. Additionally, pursuant to CEQA, the City Council is recommended to make the CEQA approvals and re-affirm the project approvals as set forth in Recommended Actions 3 through 5.

Recommendations

1. CONSIDER the four parking options for the Clean Water Campus (CWC) Project which are: 1). Additional Parking and CASP height compliance[1] ranging from $19M to $24M in hard costs (22%-27% of total parking cost), 2). Additional Parking and CASP height variance ranging from $19M to $23M in hard costs (22%-26% of total parking cost), 3). No Additional Parking and CASP height compliance, LASAN Base Case, ($0), and 4). Expandable option to allow Additional Parking at a later date ranging from $5M to $6M in hard costs (7% of total parking cost) with Additional Parking costs to be incurred at a time of the City's choosing); and SELECT the preferred Additional Parking option for the CWC Project.

[1] According to the CASP, the maximum average building height is limited to 75 feet above grade.

2. INSTRUCT City Administrative Officer to identify a funding source to be available through non-Sewer Construction Maintenance (SCM) City backed funding if parking options 1, 2, or 4 are selected.
3. FIND that the CWC Project and associated land acquisition as set forth in the California Environmental Quality Act (CEQA) Addendum, attached to this staff report:
    a. Have met the requirements of CEQA State Guidelines Section 15168(c)(2).
    b. Result in environmental effects within the scope of the FEIR as set forth in CEQA Guidelines Section 15168(c)(4).
    c. Did not require additional CEQA documentation besides the CEQA Addendum pursuant to CEQA Guidelines Section 15162.
    d. Incorporated the relevant measures developed in the FEIR as regulatory compliance measures and project design features.
4. ADOPT the CEQA Addendum.
5. RE-AFFIRM the Council Action on June 16, 2021, related to the CWC Project, which is hereby reincorporated by reference, as consistent with the CEQA Addendum.

Summary

The focus of this report will be on the additional 200 parking spaces cost and option information; additionally, this report will provide an update on the status of the CWC project (Attachment 1), including the Exclusive Negotiation Agreement (ENA), schedule.

Additional Parking

As directed by Council, LASAN evaluated the feasibility and cost associated to include 200 parking stalls in addition to LASAN's CWC parking needs, herein referred to as the "Additional Parking". The Additional Parking is currently assumed for public use or for potential use by the planned Lincoln Heights Jail Project. The following four site configurations were evaluated to determine the cost of including the Additional Parking as well as the best value to deliver the Additional Parking:

- Parking Layout Option 1 – Additional Parking + CASP Height Compliant [2]
- Parking Layout Option 2 – Additional Parking + CASP Height Variance
- Parking Layout Option 3 – No Additional Parking + CASP Height Compliant (LASAN BASE CASE)
- Parking Layout Option 4 – Expandable Option for Additional Parking at Later Date

If Council recommends inclusion of Additional Parking (Parking Layout Options 1 or 2) or the option to construct the Additional Parking at a later date (Parking Layout Options 4), the increase in cost to construct Additional Parking will be paid from non-SCM City backed funds. **The parking costs associated with the four options presented in this report are indicative for budgetary purposes only to facilitate a decision to include the Additional Parking.** The parking costs presented only consist of capital costs, and do not include certain soft costs, debt financing or operational costs. These costs as presented are subject to final pricing and further escalation beyond current assumptions, and no decision on the delivery method has been made.

[2] According to the CASP, the maximum average building height is limited to 75 feet above grade.

A decision to include the Additional Parking is required to:

(1) Finalize the programmatic requirements and the technical performance specifications for the CWC Project; and
(2) Enable LASAN to set an "Affordability Limit" for the CWC Project based on the programmatic requirements.

The Affordability Limit is a feature implemented for the proposed ENA delivery model to ensure a competitive and fair price is submitted for the CWC Project. If the purchase and sale agreement (PSA) and subsequent ENA is approved, LASAN will share the Affordability Limit along with the technical performance specifications for the "Development Team" consisting of Atwater Infrastructure Partners LLC, Goodwill, Lowe Enterprises, Swinerton, and Johnson Controls to submit a fixed price proposal no greater than the Affordability Limit.

Purchase and Sale and CEQA

On June 16, 2021, the City Council took actions related to acquiring real property located at 323 North San Fernando Road for the proposed CWC project. Among those actions, the City Council authorized the City Departments to negotiate and execute a PSA and directed the Bureau of Sanitation/Los Angeles Sanitation and Environment (LASAN) to provide status reports on PSA negotiations. LASAN, together with the Department of General Services (GSD) is negotiating a PSA with Goodwill following authorization from the City Council to acquire the property located at 323 N. San Fernando Road, (APN 5447-007-009)/(Goodwill Site). The Office of the City Administrative Officer (CAO) and the Office of the Chief Legislative Analyst (CLA) have provided input as well on the draft PSA.

Additionally, LASAN's March 16, 2021, Report to MFC related to the City Council actions noted, pursuant to state law (CEQA), that the close of escrow for the PSA would take place following the conclusion of the CEQA process and the receipt of the required approvals of CEQA and the project by the City Council. The CEQA process, as documented in the attached CEQA Addendum (Attachment 4), has now been completed. Accordingly, pursuant to CEQA, the City Council is recommended to make the CEQA approvals and re-affirm the project approvals as set forth in Recommended Actions 3 through 5.

Background

Since 2002, LASAN has leased the privately owned, 64,820 square foot facility at 2714 Media Center Drive in Los Angeles (Media Center). Following analysis of several options, in December 2015, LASAN initiated work to develop a new headquarters, referred to as the CWC Building, at the City Site.

The City Site was selected due to freeway access for the field inspector staff, proximity to City staff downtown, proximity to public transportation, ease of access to existing LASAN operated and maintained odor-control carbon scrubber located on the Humboldt Site vital to sewer operations and need for a build-to-suit facility to accommodate the specialized LASAN services. The City Site is in a largely industrial area that has remained undeveloped because of its irregular shape, set back requirements from the existing rail line, and the presence of a major drop structure and the permanent odor control scrubber. Using this site to deliver the

new CWC Building is expected to provide public support services, advance corridor redevelopment, and, subsequently, have broader economic growth benefits as determined by LASAN's consultant team.

LASAN's technical consultant, Arcadis, performed a workplace relocation strategy and site study which concluded that: (i) LASAN has a projected staffing requirement of approximately 500 staff that require space, technology, and facilities such as laboratories not currently available at the Media Center; (ii) the CWC Building would need to be approximately 159,000 square feet to accommodate LASAN's requirements; and (iii) the City Site can accommodate the CWC Building, but parking is constrained to approximately 300 of the required 500 parking stalls due to the unusual site layout, existing drop structure, and existing surface scrubber. LASAN's financial consultant, Project Finance Advisory, Ltd., performed quantitative and qualitative analysis which concluded that a public private partnership (P3) delivery of the CWC Building would provide benefits including cost savings to LASAN compared to a traditional delivery approach. Benefits of a P3 approach included:

- earliest completion;
- sustainable design in a purpose-built facility;
- construction cost certainty;
- long-term operating efficiency;
- performance based payments; and
- risk transfer to protect City.

On March 12, 2018, the City received an unsolicited offer from the Development Team. The contemplated delivery model and exclusive negotiation was expected to expedite delivery of the CWC Building, meet parking needs, and partner with a local stakeholder to develop a unified community plan.

Due to the shared interest of creating additional parking and fostering community revitalization, the City Council passed a motion on June 13, 2018, directing LASAN to explore a partnership with Goodwill to deliver a joint project (CF #18-0555).

On April 17, 2019, Council directed LASAN to form a Clean Water Campus Working Group (CWC Working Group) comprised of LASAN, CAO, CLA, Mayor's Office, and Council District 1 to develop a non-binding term sheet with Goodwill and evaluate parking options.

Initial discussions and design charrettes found the City Site had insufficient capacity to accommodate all the parking needs of LASAN, Goodwill, and any potential additional parking.

LASAN performed extensive analysis of different alternatives, and ultimately determined that the only method to achieve the full facility and parking needs for LASAN on a cost-effective basis, retain optionality to provide additional parking, and to deliver a comprehensive community development plan is by utilizing both the City Site and Goodwill Site.

In June 2021, City Council authorized LASAN and other City departments to negotiate and execute a PSA with Goodwill for the Goodwill Site, execute a License Agreement with Goodwill for 148 parking spaces, and to enter in to an exclusive negotiation with the Development Team as a condition of the PSA for a period of up to 12 months to determine if mutually agreeable terms can be reached on the design, construction, potential financing,

operations and maintenance of the proposed CWC Building under a performance-based contract.

Parking Options Summary

LASAN's parking needs for the CWC include a minimum of 540 stalls for fleet vehicles, employee parking, and visitor parking. To evaluate the City's consideration of the expenditure required to deliver the Additional Parking, LASAN identified four parking requirements which are summarized in Table 1. LASAN received preliminary cost estimates from the Development Team on the four parking layout options, and LASAN's technical advisor found the costs to be reasonable for the current budgetary level of design. Note that pricing values are for budgetary purpose only and are subject to final design and approval. Additionally, these prices reflect escalation to the midpoint of construction (July 2024) which is assumed to be 4% per year.

Table 1: CWC Parking Layout Options

	Parking Layout Option 1	**Parking Layout Option 2***	**Parking Layout Option 3****	**Parking Layout Option 4*** – 540 with option to expand to 740**
Description	Additional Parking + CASP Compliant	Additional Parking + CASP Height Variance	No Additional Parking + CASP Compliant (LASAN BASE CASE)	Expandable Option for Additional Parking at Later Date
CASP Height Compliant	Yes	No	Yes	Yes
Total Parking Spaces	Below Grade: 365 Above Grade: 358 Surface: 30 Total: 753	Below Grade: 175 Above Grade: 553 Surface: 30 Total: 758	Below Grade: 175 Above Grade: 358 Surface: 30 Total: 563	Below Grade: 395 Above Grade: 198 Surface: 30 Total: 593
Meets Additional Parking Requirements	Yes	Yes	No	No, with option to expand
Levels Below Grade	2	1	1	2
Levels Above Grade	5	7.5	5	3

Total Parking / Site Cost Escalated to Midpoint of Construction** (4% yearly escalation)**	**$90M**	**$89M**	**$74M**	**$79M**
*SCM Parking Budget Allocation*****	*$66M - $70M*	*$65M -$69M*	*$74M*	*$73M - $74M*
*Non-SCM City Backed Funding Parking Budget Allocation*****	*$19M - 24M*	*$19M - 23M*	*$0M*	*$5M - $6M*

* If Parking Layout Option 2 is the preferred configuration, then the project will require an adjustment/amendment to the Cornfield Arroyo Seco Plan (CASP), and the discretionary action to approve the adjustment/amendment cannot be guaranteed at this time.

**Parking Layout Option 3 (No Additional Parking + CASP Compliant) includes parking for LASAN use at the CWC Project and all costs associated with Option 3 will be paid from SCM funds.

*** The total cost for Parking Layout Option 4 is to retain the option to expand the parking structure at a later date and additional costs are not identified in this report.

****Midpoint of Construction is expected to be July 2024.

***** This range represents two different methodologies to calculate the cost allocation for two different funding sources. Non-SCM City Backed Funding allocation does not take into account approx. 80,405 sq ft. attributed to sitework. Per the Development Team, sitework includes all of the work outside of the four walls of the above grade structure (and future building), and all sitework above the subterranean parking. This includes all of the surface parking areas, fire lane and site access, as well as all pedestrian plazas (hardscape and landscape).

The parking analysis identified the following cost drivers for the parking structure:

1) Above grade structure includes premium of approximately $500,000 to $1,000,000, depending on the option, to include flat floors, 12-foot floor to ceiling height, and exterior ramping so parking can be re-purposed, if needed
2) The cost associated with photovoltaic panels and structure for full footprint of garage is approximately $2,555,000
3) Cost allocation for disposal of contaminated soil previously identified onsite is included

Based on the above preliminary parking cost estimate,

1) **Cost to Include 200 Additional Parking Stalls**: The capex cost for non-SCM City backed funding for the additional 200 stalls (assuming CASP compliance in Option 1) is approximately $19 million to 24 million. The capital cost savings to exceed CASP height requirements (Options 1 vs Option 2) is subject to a discretionary action to approve a variance to the CASP height requirements and cannot be guaranteed at this time. If inclusion of the 200 additional parking stalls is approved, the additional capital cost will be paid through non-SCM City backed funds.
2) **Expandable Option**: The premium to retain the option to expend the parking structure at a later date (Option 3 vs Option 4) is approximately $5 million to $6 million, not including the cost to build out the additional parking. This option may include a surplus of 50 parking stalls for City use prior to the full expansion. If Option 4 is selected, the approximately $5 million to $6 million additional capital costs will be paid through non-SCM City backed funds.

The following table summarizes the benefits and disadvantages of each parking layout option for the City.

Table 2: Parking Layout Summary

	Parking Layout Option 1	**Parking Layout Option 2**	**Parking Layout Option 3**	**Parking Layout Option 4**
Benefit	Achieves LASAN and Additional Parking requirements with no CASP Height variation	Achieves LASAN and Additional Parking requirements at a slightly lower capital cost to Parking Layout Option 1	Achieves LASAN's parking needs with no funding requirement from non-SCM City Backed funds	Provides flexibility for City to add Additional Parking post construction of the CWC Project. May include a surplus of 50 parking stalls for City use
Disadvantage	Highest cost option with Additional Parking funded by non-SCM City Backed funds	Will require an adjustment / amendment to the CASP, and the discretionary action to approve the adjustment / amendment cannot be guaranteed at this time; Additional Parking funded by non-SCM City Backed funds	Does not provide Additional Parking	Option includes a premium cost to retain the ability to add Additional Parking. If Additional Parking is constructed at a later date, the capital cost of the Additional Parking could be higher due to impact/phasing of construction during operations of the CWC Building.

Attachments:

Attachment 1: CWC Project Update
Attachment 2: Parking Layout Options
Attachment 3: Council Action
Attachment 4: CEQA Addendum

GEN. FORM 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: September 30, 2021

To: Municipal Facilities Committee

From: Barbara Romero
Director and General Manager
LA Sanitation and Environment

Subject: **STATUS REPORT REGARDING THE CLEAN WATER CAMPUS (CWC) PROJECT AND PROCUREMENT OF PROPERTY LOCATED AT 323 N. SAN FERNANDO ROAD, CONSIDERATION AND SELECTION OF PREFERRED ADDITIONAL PARKING OPTION, IDENTIFICATION OF FUNDING SOURCE FOR ADDITIONAL PARKING OPTION SELECTED, ADDENDUM TO CORNFIELD ARROYO SECO SPECIFIC PLAN ENVIRONMENTAL IMPACT REPORT, SCH NUMBER 2009031002 (FEIR) AND RELATED CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) RECOMMENDATIONS, AND RE-AFFIRMATION OF JUNE 16, 2021 CITY COUNCIL ACTION RELATIVE TO LAND ACQUISITION RELATED TO THE CWC (Council File No. 18-0555)**

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The purpose of providing the additional parking indicative pricing for four different options is for the City Council to determine whether the additional 200 parking spaces (Additional Parking) can be funded and constructed as part of the Clean Water Campus project. Additionally, pursuant to CEQA, the City Council is recommended to make the CEQA approvals and re-affirm the project approvals as set forth in Recommended Actions 3 through 5.

Recommendations

1. CONSIDER the four parking options for the Clean Water Campus (CWC) Project which are: 1). Additional Parking and CASP height compliance[1] (ranging from $21,170,644 to $23,814,077), 2). Additional Parking and CASP height variance (ranging from $20,766,726 to $23,358,839), 3). No Additional Parking and CASP height compliance, LASAN Base Case, ($0), and 4). Expandable option to allow Additional Parking at a later date (ranging from $4,767,363 to $5,360,000 with Additional Parking costs to be incurred at a time of the City's choosing); and SELECT the preferred Additional Parking option for the CWC Project.

[1] According to the CASP, the maximum average building height is limited to 75 feet above grade.

2. INSTRUCT City Administrative Officer to identify a funding source to be available through non-Sewer Construction Maintenance (SCM) City backed funding if parking options 1, 2, or 4 are selected.
3. FIND that the CWC Project and associated land acquisition as set forth in the California Environmental Quality Act (CEQA) Addendum, attached to this staff report:
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Summary

The focus of this report will be on the additional 200 parking spaces cost and option information, additionally this report will provide an update on the status of the CWC project (Attachment 1), including the Exclusive Negotiation Agreement (ENA), schedule.

Additional Parking

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A decision to include the Additional Parking is required to:

[2] According to the CASP, the maximum average building height is limited to 75 feet above grade.

(1) Finalize the programmatic requirements and the technical performance specifications for the CWC Project; and
(2) Enable LASAN to set an "Affordability Limit" for the CWC Project based on the programmatic requirements.

The Affordability Limit is a feature implemented for the proposed ENA delivery model to ensure a competitive and fair price is submitted for the CWC Project. If the PSA and subsequent ENA is approved, LASAN will share the Affordability Limit along with the technical performance specifications for the "Development Team" consisting of Atwater Infrastructure Partners LLC, Goodwill, Lowe Enterprises, Swinerton, and Johnson Controls to submit a fixed price proposal no greater than the Affordability Limit.

Purchase and Sale and CEQA

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Background

Since 2002, LASAN has leased the privately owned, 64,820 square foot facility at 2714 Media Center Drive in Los Angeles (Media Center). Following analysis of several options, in December 2015, LASAN initiated work to develop a new headquarters, referred to as the CWC Building, at the City Site.

The City Site was selected due to freeway access for the field inspector staff, proximity to City staff downtown, proximity to public transportation, ease of access to existing LASAN operated and maintained odor-control carbon scrubber located on the Humboldt Site vital to sewer operations and need for a build-to-suit facility to accommodate the specialized LASAN services. The City Site is in a largely industrial area that has remained undeveloped because of its irregular shape, set back requirements from the existing rail line, and the presence of a major drop structure and the permanent odor control scrubber. Using this site to deliver the new CWC Building is expected to provide public support services, advance corridor

redevelopment, and subsequently have broader economic growth benefits as determined by LASAN's consultant team.

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- earliest completion;
- sustainable design in a purpose-built facility;
- construction cost certainty;
- long-term operating efficiency;
- performance based payments; and
- risk transfer to protect City.

On March 12, 2018, the City received an unsolicited offer from the Development Team. The contemplated delivery model and exclusive negotiation was expected to expedite delivery of the CWC Building, meet parking needs, and partner with a local stakeholder to develop a unified community plan.

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LASAN performed extensive analysis of different alternatives, and ultimately determined that the only method to achieve the full facility and parking needs for LASAN on a cost-effective basis, retain optionality to provide additional parking, and to deliver a comprehensive community development plan is by utilizing both the City Site and Goodwill Site.

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operations and maintenance of the proposed CWC Building under a performance-based contract.

Parking Options Summary

LASAN's parking needs for the CWC include a minimum of 540 stalls for fleet vehicles, employee parking, and visitor parking. To evaluate the City's consideration of the expenditure required to deliver the Additional Parking, LASAN identified four parking requirements which are summarized in Table 1. LASAN received preliminary cost estimates from the Development Team on the four parking layout options, and LASAN's technical advisor found the costs to be reasonable for the current budgetary level of design. Note, pricing values are for budgetary purpose only and are subject to final design and approval. Additionally, these prices do not reflect escalation to the midpoint of construction (July 2024). According to Goodwill, escalation could range from 3% to 4%, so total costs could be higher.

Table 1: CWC Parking Layout Options

	Parking Layout Option 1	**Parking Layout Option 2***	**Parking Layout Option 3****	**Parking Layout Option 4*** – 540 with option to expand to 740**
Description	Additional Parking + CASP Compliant	Additional Parking + CASP Height Variance	No Additional Parking + CASP Compliant (LASAN BASE CASE)	Expandable Option for Additional Parking at Later Date
CASP Height Compliant	Yes	No	Yes	Yes
Total Parking Spaces	Below Grade: 365 Above Grade: 358 Surface: 30 Total: 753	Below Grade: 175 Above Grade: 553 Surface: 30 Total: 758	Below Grade: 175 Above Grade: 358 Surface: 30 Total: 563	Below Grade: 395 Above Grade: 198 Surface: 30 Total: 593
Meets LASAN Parking Requirements	Yes	Yes	Yes	Yes
Meets Additional Parking Requirements	Yes	Yes	No	No, with option to expand
Levels Below Grade	2	1	1	2
Levels Above Grade	5	7.5	5	3

Total Parking / Site Cost	**$79,707,475**	**$78,705,893**	**$65,488,309**	**$70,255,672**
SCM Parking Budget Allocation	*$58,536,831*	*$57,939,167*	*$65,488,309*	*$65,488,309*
Non-SCM City Backed Funding Parking Budget Allocation	*$21,170,644*	*$20,766,726*	*$0*	*$4,767,363*
Total Parking / Site Cost Escalated to Midpoint of Construction** **(4% yearly escalation)**	**$89,660,000**	**$88,530,000**	**$73,670,000**	**$79,030,000**
SCM Parking Budget Allocation (including escalation)	*$65,845,923*	*$65,171,161*	*$73,670,000*	*$73,670,000*
Non-SCM City Backed Funding Parking Budget Allocation (including escalation)	*$23,814,077*	*$23,358,839*	*$0*	*$5,360,000*

* If Parking Layout Option 2 is the preferred configuration, then the project will require an adjustment/amendment to the Cornfield Arroyo Seco Plan (CASP), and the discretionary action to approve the adjustment/amendment cannot be guaranteed at this time.

**Parking Layout Option 3 (No Additional Parking + CASP Compliant) include parking for LASAN use at the CWC Project and all costs associated with Option 3 will be paid from Sewer Construction Maintenance (SCM) funds.

*** The total cost for Parking Layout Option 4 is to retain the option to expand the parking structure at a later date and additional costs are not identified in this report.

****Midpoint of Construction is expected to be July 2024.

The parking analysis identified the following cost drivers for the parking structure:

1) Above grade structure includes premium of approximately $500,000 to $1,000,000, depending on the option, to include flat floors, 12-foot floor to ceiling height, and exterior ramping so parking can be re-purposed, if needed
2) The cost associated with photovoltaic panels and structure for full footprint of garage is approximately $2,555,000
3) Cost allocation for disposal of contaminated soil previously identified onsite is included

Based on the above preliminary parking cost estimate,

1) **Cost to Include 200 Additional Parking Stalls**: The capex cost for non-SCM City backed funding include the additional 200 stalls (assuming CASP compliance in Option 1) is approximately $21.2 million to 23.8 million. The capital cost savings to exceed CASP height requirements (Options 1 vs Option 2) is subject to a discretionary action to approve the variance that cannot be guaranteed at this time. If inclusion of the 200 additional parking stalls is approved, the additional capital cost will be paid through non-SCM City backed funds.
2) **Expandable Option**: The premium to retain the option to expend the parking structure at a later date (Option 3 vs Option 4) is approximately $4.8 million to $5.4 million, not including the cost to build out the additional parking. This option may include a surplus of 50 parking stalls for City use prior to the full expansion. If Option 4 is selected, the approximately $4.8 million to $5.4 million additional capital costs will be paid through non-SCM City backed funds.

The following table summarizes the benefits and disadvantages of each parking layout option for the City.

Table 2: Parking Layout Summary

	Parking Layout Option 1	**Parking Layout Option 2**	**Parking Layout Option 3**	**Parking Layout Option 4**
Benefit	Achieves LASAN and Additional Parking requirements with no CASP Height variation	Achieves LASAN and Additional Parking requirements at a slightly lower capital cost to Parking Layout Option 1	Achieves LASAN's parking needs with no funding requirement from non-SCM City Backed funds	Provides flexibility for City to add Additional Parking post construction of the CWC Project. May include a surplus of 50 parking stalls for City use
Disadvantage	Highest cost option with Additional Parking funded by non-SCM City Backed funds	Will require an adjustment / amendment to the CASP, and the discretionary action to approve the adjustment / amendment cannot be guaranteed at this time; Additional Parking funded by non-SCM City Backed funds	Does not provide Additional Parking	Option includes a premium cost to retain the ability to add Additional Parking. If Additional Parking is constructed at a later date, the capital cost of the Additional Parking could be higher due to impact/phasing of construction during operations of the CWC Building.

Attachments:

Attachment 1: CWC Project Update
Attachment 2: Parking Layout Options
Attachment 3: Council Action
Attachment 4: CEQA Addendum

Attachment 1 CWC Project Update

Purchase and Sale Agreement (PSA)

Following authorization to negotiate and execute a PSA for the Goodwill Site, LASAN along with other City departments are engaged in extensive negotiations with Goodwill regarding the PSA based on the key terms summarized in the March 16, 2021 report. A second draft of the PSA was sent to Goodwill in August 2021 and LASAN is coordinating further negotiations with Goodwill to advance the PSA. Timing of the PSA is tied to CEQA as CEQA approval is required before the purchase can be completed, and close of escrow is currently assumed to be February 2022.

Exclusive Negotiating Agreement (ENA)

LASAN along with other City departments are engaged in negotiations with Goodwill to agree in principle to an ENA to define the roles and responsibilities of each party during the exclusive negotiating period, with this exclusive negotiating period as a key term in the PSA.

Exclusively negotiating with Goodwill after purchasing the Goodwill Site allows LASAN and the City to:

(1) Achieve a complete onsite parking solution for LASAN and City
(2) Potentially expedite delivery of the project through a direct negotiation
(3) Partnership with local stakeholder for a holistic approach to neighborhood development
(4) Facilitate Goodwill's ability to participate in operations and maintenance for workforce training as part of their mission as a non-profit

Challenges the exclusive negotiating clause presents includes:

(1) Lack of competitive tension – a potential mitigation is establishment of an affordability limit the Development Team must meet the City's request.
(2) Site acquisition cost – cost to acquire Goodwill Site is offset by benefits to achieve full parking solution for LASAN and other potential City needs
(3) Additional complexity to negotiate PSA, ENA, and potential parking lease – mitigated by preliminary term sheets presented in this report and previous reports

The draft ENA, under negotiation, defines the term for exclusive negotiations, tasks for each party during the negotiating period, requirements for a compliant proposal from the Development Team, key members of the Development Team, and a non-binding term sheet to form the basis of a Project Agreement if such agreement is later negotiated. LASAN, at the time of writing this report, is drafting the latest version of the ENA subject to a decision on financing for the project described in the next section.

If successfully negotiated between the parties, LASAN will seek Board of Public Work's approval of the ENA. This request would include BPW's finding that the ENA could be negotiated with the Development Team on a sole-source basis because Goodwill conditioned its sale in part on an exclusive negotiating right. Neither the terms of nor approval of any exclusive negotiating agreement are thus part of this request. Based on the current assumed schedule, a signed ENA would be delivered into escrow around February 2022.

Financing Option Summary

LASAN and its advisors are reviewing the preliminary plan of finance from the Development Team compared to a City-led financing to make recommendations about best value.

From a qualitative perspective, LASAN is considering a Developer Team led financing for the following reasons:

(1) Financing will be non-recourse to the City with no collateral provided by the City
(2) The CWC Project will be financed with tax-exempt debt through Project Company
(3) LASAN will not pay any Base Rent to repay Developer's debt service until planed substantial completion of the CWC Project, therefore making available funds for other capital projects during the construction phase of the CWC Project.

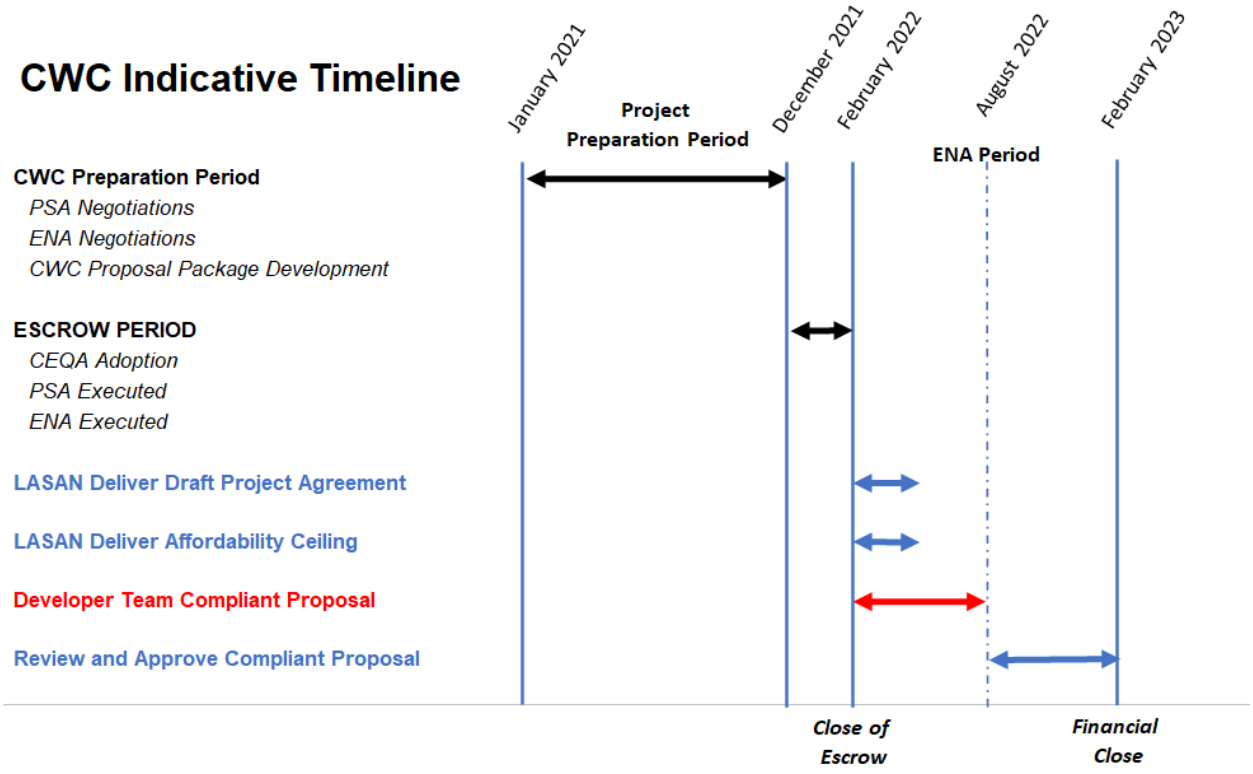
LASAN is also considering financing the CWC project under a DBOM delivery model for the following reasons:

(1) Potential to reduce financing costs
(2) Developer Team led financing may still impact City's debt limit

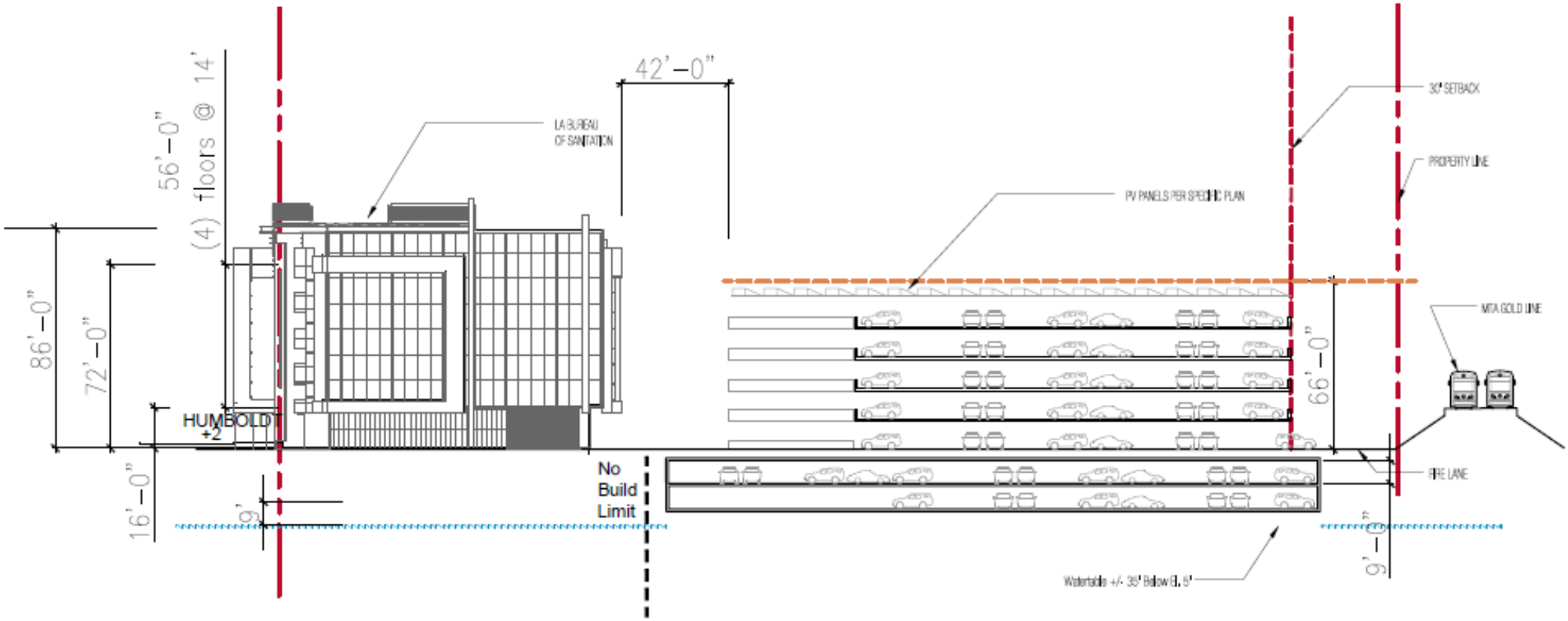
A quantitative analysis is forthcoming comparing a DBFOM vs a DBOM delivery.

CWC Indicative Timeline

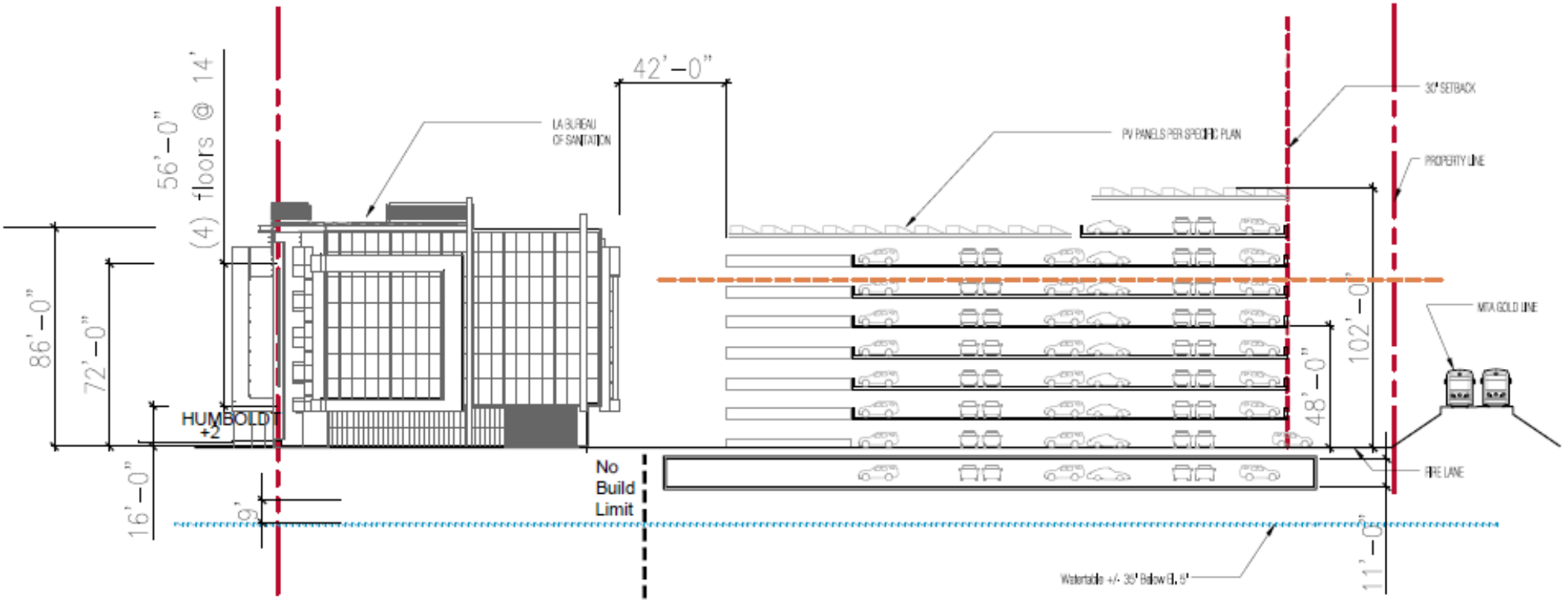
The current indicative timeline for the CWC Project is shown below.



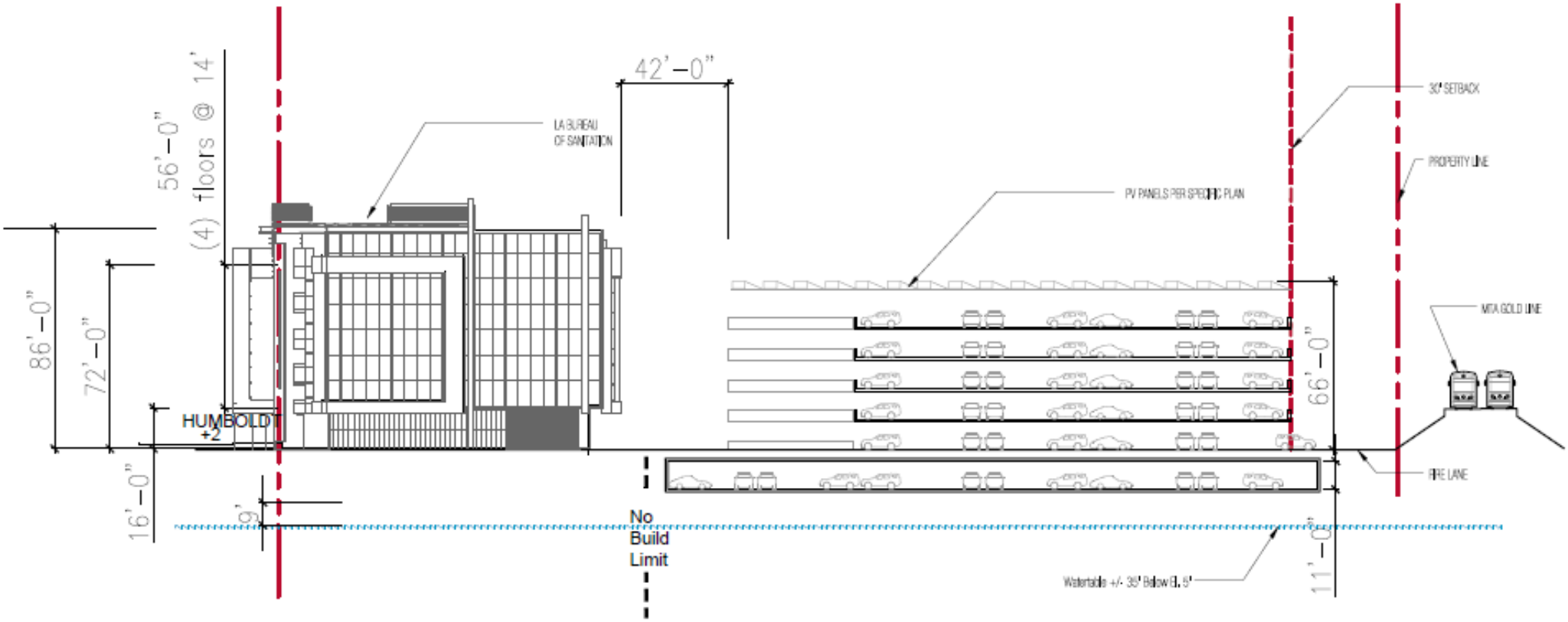
Parking Layout Option 1 – Cross Section View



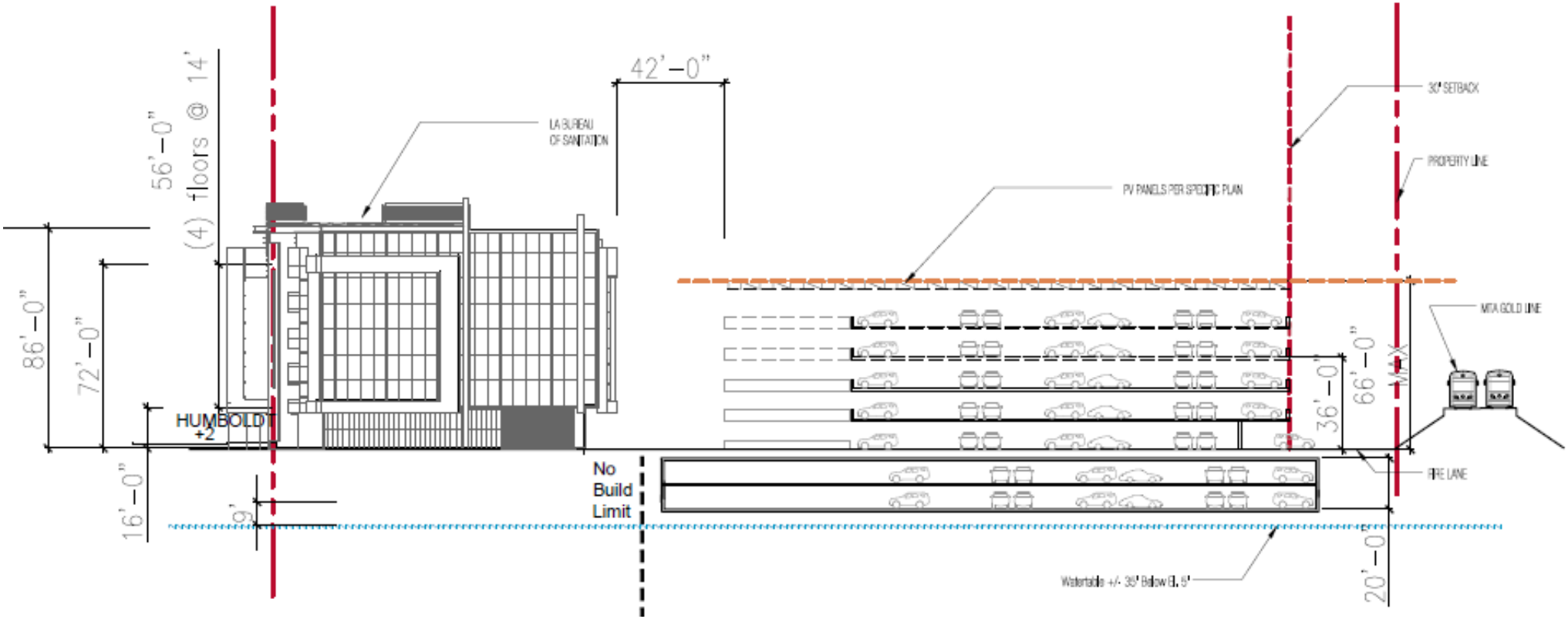
Parking Layout Option 2 – Cross Section View



Parking Layout Option 3 – Cross Section View



Parking Layout Option 4 – Cross Section View



HOLLY L. WOLCOTT
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER

City of Los Angeles

CALIFORNIA

ERIC GARCETTI
MAYOR

OFFICE OF THE
CITY CLERK

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
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PATRICE Y. LATTIMORE
DIVISION MANAGER
CLERK.LACITY.ORG

June 18, 2021

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

Council File No.: 18-0555

Council Meeting Date: June 16, 2021

Agenda Item No.: 8

Agenda Description: INFORMATION, TECHNOLOGY, AND GENERAL SERVICES COMMITTEE REPORT relative to acquiring real property located at 323 North San Fernando Road for the proposed Clean Water Campus (CWC) project.

Council Action: INFORMATION, TECHNOLOGY, AND GENERAL SERVICES COMMITTEE REPORT - ADOPTED FORTHWITH

Council Vote:

YES	Blumenfield	YES	Bonin	YES	Buscaino
YES	Cedillo	YES	de León	YES	Harris-Dawson
YES	Koretz	YES	Krekorian	YES	Lee
YES	Martinez	YES	O'Farrell	ABSENT	Price
YES	Raman	YES	Ridley-Thomas	YES	Rodriguez

HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 341

FILE SENT TO MAYOR	06/21/2021
LAST DAY FOR MAYOR TO ACT	07/01/2021

APPROVED

6/28/2021

DATE SIGNED

Adopted Report(s)Title
Report from Information, Technology, and General Services Committee_6-3-21

File No. 18-0555

INFORMATION, TECHNOLOGY, AND GENERAL SERVICES COMMITTEE REPORT relative to acquiring real property located at 323 North San Fernando Road for the proposed Clean Water Campus (CWC) project.

Recommendations for Council action, SUBJECT TO THE APPROVAL OF THE MAYOR:

1. AUTHORIZE the Bureau of Sanitation (BOS), Department of General Services (GSD), City Administrative Officer (CAO), and Chief Legislative Analyst (CLA) to negotiate and execute a purchase and sale agreement (PSA) with Goodwill Southern California (Goodwill) to acquire the property located at 323 North San Fernando Road, (APN 5447-007-009)/(Goodwill Site), pursuant to the Motion, attached to the Council file, for the not to exceed amount of $6,050,000 plus $15,000 in transaction costs.

2. AUTHORIZE the GSD to execute a License Agreement for 148 parking spaces with Goodwill to allow Goodwill personnel to park their vehicles at the Goodwill Site preconstruction for a period of one year from the date of purchase.

3. AUTHORIZE the BOS, GSD, CAO, and CLA to enter into an exclusive negotiation with the Development Team as a condition of the PSA, for up to a 12-month period to determine if mutually agreeable terms can be reached on the design, construction, and maintenance of the proposed CWC Building under a performance-based contract. The authority provided under Recommendation Nos. 1, 2 and 3 are subject to the resulting agreements and must substantially adhere to Attachment 3 - the Goodwill Site Term Sheet and License Agreement Term Sheet attachment to the Municipal Facilities Committee (MFC) report dated April 16, 2021, attached to the Council file.

4. REQUEST the Controller, upon instructions from the Director and General Manager, BOS, to create a new appropriation in the Wastewater System Commercial Paper A Construction Fund No. 70W/50, Appropriation Unit TBD, in the amount of $6,065,000.

5. AUTHORIZE the BOS to encumber $100,000 in the Sewer Capital Fund No. 761/50, Appropriation Unit No. 50SGC3, for a contract with a consultant to provide an independent financial analysis of the Exclusive Negotiating Agreement, related agreements, cost comparisons with other project delivery models, etc. This contract shall be administered by the CAO, with assistance from the CLA.

6. DIRECT the BOS to provide bi-monthly status reports on the status of the negotiations to the MFC and in advance of the deadline for determining inclusion of the additional 200 parking spaces.

7. AUTHORIZE the CAO and CLA to make technical corrections consistent with the Mayor and Council action on this matter.

Fiscal Impact Statement: The MFC reports that there is no anticipated fiscal impact to the General Fund resulting from the above recommendations, as associated costs will be paid from budgeted funds within the Sewer Construction and Maintenance Fund.

Debt Impact Statement: The MFC reports that the issuance of Wastewater System Revenue Bonds (Bonds) is an obligation of the Sewer Construction and Maintenance Fund. The issuance of Bonds to refinance the commercial paper notes included in this report would cause the City to borrow $6,065,000 at an assumed interest rate of 5.5% over 30 years. The resulting estimated debt service is approximately $12,519,000 including interest of $6,454,000. During the life of the bonds, the estimated average annual debt service is approximately $417,000. Actual interest rates may differ as rates are dependent on market conditions at the time of issuance. The MFC cannot fully predict what interest rates will be in the future.

Financial Policies Statement: The MFC reports that the above recommendations comply with the City's Financial Policies in that expenditures of the special funds are limited to and within the mandate of the funding source.

Community Impact Statement: None submitted.

SUMMARY

At the meeting held on June 3, 2021, your Information, Technology, and General Services Committee considered a MFC report relative to acquiring real property located at 323 North San Fernando Road for the proposed CWC project. After an opportunity for public comment was held, the Committee moved to approve the MFC's recommendations, as detailed above. This matter is now forwarded to the Council for its consideration.

Respectfully Submitted,

INFORMATION, TECHNOLOGY, AND GENERAL SERVICES COMMITTEE

MEMBER	VOTE
RAMAN:	YES
BLUMENFIELD:	YES
PRICE:	YES

ME 6/3/21

-NOT OFFICIAL UNTIL COUNCIL ACTS-

CEQA Guidelines Section 15168 Addendum to Cornfield Arroyo Seco Specific Plan Environmental Impact Report, SCH Number 2009031002

LASAN Clean Water Campus, Los Angeles, California

Prepared for:
Los Angeles Sanitation and Environment
2714 Media Center Drive
Los Angeles, CA 90065

Contact:
Troy Ezeh
Environmental Engineer
(323) 342-6251

September 2021

TABLE OF CONTENTS

Tables

Figures

Appendices

1. Introduction

On June 28, 2013, the Los Angeles City Council adopted the Cornfield Arroyo Seco Specific Plan ("CASP") and certified its Final Environmental Impact Report (SCH No. 2009031002) ("FEIR") ("2013 FEIR") (see Appendix A). The CASP involved substantial revisions to portions of the Central City North and Northeast Los Angeles Community Plan areas, including new mixed-use zoning districts that expanded the range and intensities of permitted uses. The FEIR identified the possible environmental impacts associated with implementing the CASP through 2035. As a project- and program-level document, the FEIR also analyzed any potential environmental impacts of projects that comply with the CASP pursuant to the California Environmental Quality Act ("CEQA"), thereby allowing for ministerial review of certain future projects implementing the CASP.

In response to rapid growth and organizational change, the City of Los Angeles Sanitation and Environment (LASAN) is creating the Clean Water Campus (CWC) Project, a new work environment that reflects their identity and supports the current and future work of LASAN. The CWC will include up to 480 office spaces, a laboratory, a fully equipped auditorium, Community Learning Center to inform the public of LASAN's Programs, including Industrial Pretreatment Program, and solids resource management programs. Additionally, the CWC will include 740 parking spaces distributed between parking at grade, and below grade and above grade parking structures with an open plaza between the CWC building and parking structure. The CWC is located within the CASP planning area and therefore, impacts associated with the development of the CWC were analyzed in the 2013 CASP FEIR.

Pursuant to CEQA Guidelines 15168, later activities in a program-level analysis in the EIR must be examined in light of the EIR to determine whether an additional environmental document must be prepared. This 15168 Addendum provides the substantial evidence required by CEQA to support the determination that the environmental effects of the CWC are within the scope of the 2013 FEIR.

1.1 Purpose of EIR Addendum

This document is a CEQA Guidelines 15168 Addendum to the certified FEIR for the CASP and has been prepared to fulfill the requirements of CEQA. Specifically, Section 15168(c) of the CEQA Guidelines states:

(c) Use With Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

(1) If a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration. That later analysis may tier from the program EIR as provided in Section 15152.

(2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.

(4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

(5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

As detailed in this 15168 Addendum, the environmental effects of the proposed Project are within the scope of the CASP FEIR as documented in the below written checklist pursuant to CEQA Guidelines Section 15168(c)(4). Therefore, this 15168 Addendum to the certified 2013 FEIR is the appropriate environmental document, as the proposed Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects analyzed in the 2013 FEIR.

1.2 Certified Final EIR

The Notice of Preparation (“NOP”) for the Cornfield Arroyo Seco Specific Plan EIR (SCH No. 2009031002) was received and circulated by the State Clearinghouse on March 3, 2009 through March 30, 2009. Due to a change in the Project Description that contemplated the development of a Redevelopment Project Area for the Plan area, a second NOP was prepared and circulated November 3, 2010 through December 15, 2010.

The Original Draft EIR (“DEIR”) was prepared and circulated for a period of 60 days, beginning on September 22, 2011 and ending on November 21, 2011. In response to comments received during the public comment period for the DEIR, the Lead Agency prepared and circulated, for a period of 45 days, a Recirculated Portions DEIR (“RP-DEIR”) that replaced several portions of the Original DEIR. The comment period for the RP-DEIR began on May 31, 2012 and ended on July 16, 2012. The Final EIR, which responded to all of the comments received on the RP-DEIR, was prepared in August 2012. The Los Angeles City Council certified the Final EIR and adopted the Statement of Overriding Considerations for the Plan on June 28, 2013.

The CWC occurs completely within the CASP planning area and therefore, impacts associated with its development have been analyzed at the programmatic level in the 2013 FEIR. This addendum documents that the development of the CWC would not result in new impacts or an increase in severity of impacts compared with the impacts analyzed in the CASP FEIR and is therefore within the scope of the 2013 FEIR.

2. Environmental Checklist

1. Project title	LASAN Clean Water Campus
2. Lead Agency and Address	Los Angeles Sanitation and Environment (LASAN) Troy Ezeh P.E. 2714 Media Center Drive Los Angeles, CA 90065 (323) 342-6251
3. Contact person and phone number	Troy Ezeh, P.E. 2714 Media Center Drive Los Angeles, CA 90065 (323) 342-6251
4. Project location	See Figure 1
5. Project Sponsor's Name and Address	Los Angeles Sanitation and Environment Troy Ezeh, P.E. 2714 Media Center Drive Los Angeles, CA 90065 (323) 342-6251
6. General Plan Designation	Urban Innovation
7. Zoning	Industrial Commercial
8. Project Description	See below in Section 2.2
9. Surrounding land uses and setting. Briefly describe project's surroundings	See below in Section 2.2

10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement)	See below in Section 2.2.9

2.1 Evaluation of Environmental Impacts:

1. The Written Checklist below has been modified to conform with CEQA Guidelines Section 15168(c)(4) in order to determine whether the environmental effects of the CWC were covered under the certified Program EIR.

2. A brief explanation is required for all answers except “no impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “no impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “no impact” answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

3. All answers must take account of the whole action involved, including off site as well as on site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

4. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. Since the Written Checklist is used to evaluate a subsequent Program activity to determine whether its environmental effects were covered in the certified Program EIR, the Written Checklist impact headings are relative to the impacts and mitigation measures identified in the certified Program EIR. “Potentially significant impact” is appropriate if there is substantial evidence that an effect may be a new or substantially more severe significant impact than discussed in the certified Program EIR. If there are one or more “potentially significant impact” entries when the determination is made, a subsequent EIR is required.

5. A “less than significant with mitigation incorporated” applies when the incorporation of mitigation measures in addition to those applied in the certified Program EIR has reduced an effect from a “potentially significant impact” to a “less than significant impact,” relative to the impacts identified in the certified Program EIR. The lead agency must describe the new mitigation measures and briefly explain how they reduce the effect to a less than significant level (relative to the certified Program EIR).

6. Earlier analyses may be used if, pursuant to tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063[c][3][D]). In this case, a brief discussion should identify the following:

    a. Earlier analysis used. Identify and state where earlier analyses are available for review.

b. Impacts adequately addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c. Mitigation measures. For effects that are "less than significant with mitigation incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

7. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.

8. Supporting information sources. A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

9. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

10. The explanation of each issue should identify:

    a. the significance criteria or threshold, if any, used to evaluate each question, and

    b. the mitigation measure identified, if any, to reduce the impact to a less than significant level.

11. The evaluations with this Written Checklist assume compliance with all applicable federal, state, and local laws, regulations, rules, and codes. In addition, the evaluation assumes that all conditions in applicable agency permits are complied with, including but not limited to local permits, air quality district permits, water quality permits and certifications, and other agency permits, as applicable.

2.2 Project Description

In response to rapid growth and organizational change, the City of LA Sanitation and Environment (LASAN) is creating the Clean Water Campus (CWC) Project, a new work environment that reflects their identity and supports the current and future work of LASAN. The CWC is proposed to include office space for approximately 480 LASAN staff[1], a laboratory, a fully equipped auditorium, and Community Learning Center to engage the public in LASAN's Programs, including the Industrial Pretreatment Program, and Solids Resource Management

[1] The CWC building will accommodate up to approximately 480 LASAN staff. The Project is in the conceptual design phase. The total area of each floor, number of individual offices, and number of staff space on each floor will be as the Project moves forward in design.

Program in the City of Los Angeles. Additionally, the CWC will include up to 740 parking spaces distributed between parking at grade, below grade, and above grade parking structures with an open plaza between the CWC building and parking structure.

The proposed CWC building will provide a central location for the five Media Center divisions and will be located on a currently vacant area, partially owned by LASAN, at the corner of North San Fernando Road and Humboldt Street (Figure 1). The Project elements are proposed to be constructed on three adjacent parcels totaling 117,690 square feet (after street dedication) in the Lincoln Heights neighborhood close to the confluence of the Los Angeles River with Arroyo Seco. Table 1 summarizes the parcels, parcel size and current ownership of the Project site.

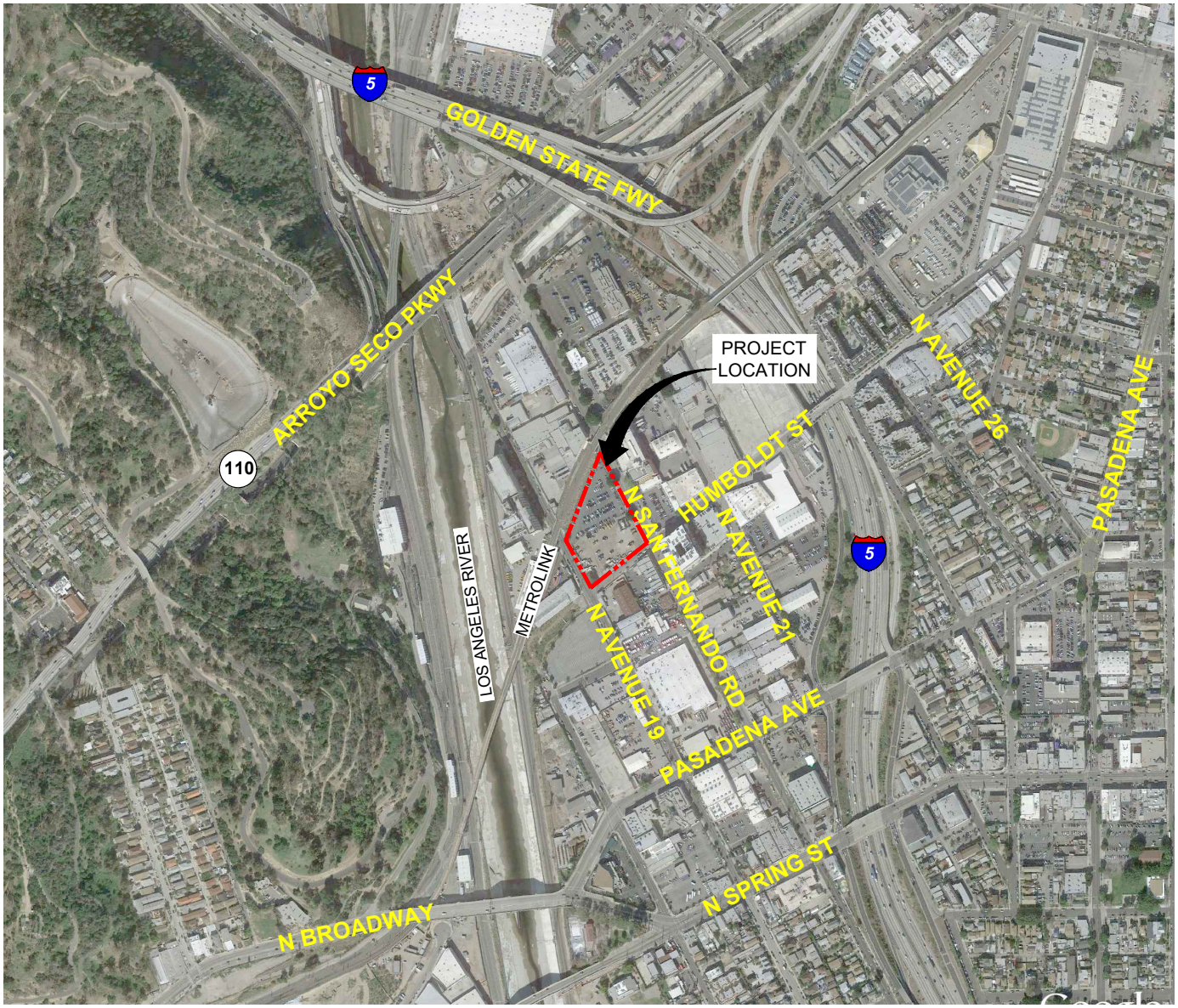
Table 1. Parcel and Ownership Information

AIN	Address	APN Size (sq feet)	Street Dedication (sq feet)	Current Ownership
5447-007-901	303 N. San Fernando Rd. Los Angeles, CA 90031	53,143	2,463	City of Los Angeles
5447-007-900	N/A	25,890	680	City of Los Angeles
5447-007-009	N/A	42,500	700	Goodwill

The site is bounded by Humboldt Street to the south, North San Fernando Road to the east, North Avenue 19 to the west, and the Gold Line commuter tracks to the north. The Project is located within the CASP and development and construction in this area must comply with Land Use, Zoning, Floor Area Limitations, Setbacks, Lot Coverage, and Building Height requirements among many other criteria. Compliance with the CASP will be strictly required for this project excepting for variations applied for and approved by the Los Angeles Department of City Planning.

Currently, LASAN uses the southern portion of the site for materials storage and equipment parking. The northern portion of the site is currently owned by Goodwill Industries and is used for parking. A portion of the City property is currently leased to Goodwill for additional parking by Goodwill. The Goodwill portion of the site is currently asphalt paved. LASAN will purchase this parcel from Goodwill Industries.

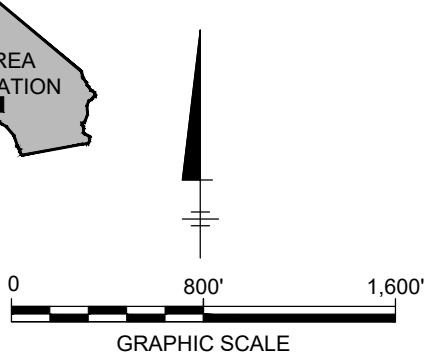
LASAN operates an underground 96-inch sewer pipe on the east side of the Project site and an above-ground carbon- odor scrubber on the southeast corner of the Project site to extract and



MAP SOURCE: Google Earth Pro™ 2016, 34°04'36.71"N, 118°13'24.01"W

LEGEND:

PROPERTY BOUNDARY



LOS ANGELES SANITATION and ENVIRONMENT
CLEAN WATER CAMPUS

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE 1

neutralize excess sewer gas. Both the below grade 96-inch sewer pipe and the above-grade scrubber will remain on-site during and post construction.

The CWC Program includes the following:

- A six-story 160,000 square foot structure with each floor approximately 25,000 square feet
- Office space for up to approximately 480 LASAN employees
- A Community Learning Center
- Below-grade parking for CWC building and surrounding area
- Above-grade parking for CWC building and surrounding area
- Purchase of Parcel 5447-007-009 from Goodwill Industries
- Installation of infrastructure including sidewalks, street lighting, and site landscaping; and
- Minimum LEED Gold rating per City of Los Angeles policies.

2.2.1 Clean Water Campus Building

The proposed CWC is proposed to consist of a six story, approximately 160,000 square foot office building, designed to house office space for up to approximately 480 LASAN employees. A conceptual Site Plan is shown in Figure 2[2]. Each floor of the Clean Water Campus will be approximately 25,000 square feet and the highest occupied floor of the CWC will be a maximum of 75 feet above grade. Proposed buildings on the site, including the above grade parking structure, will reach a maximum average height, including heating/ventilation/air condition (HVAC) and associated screening, of approximately 90 feet above grade level, as measured from the lowest adjacent grade elevation on North San Fernando Road.

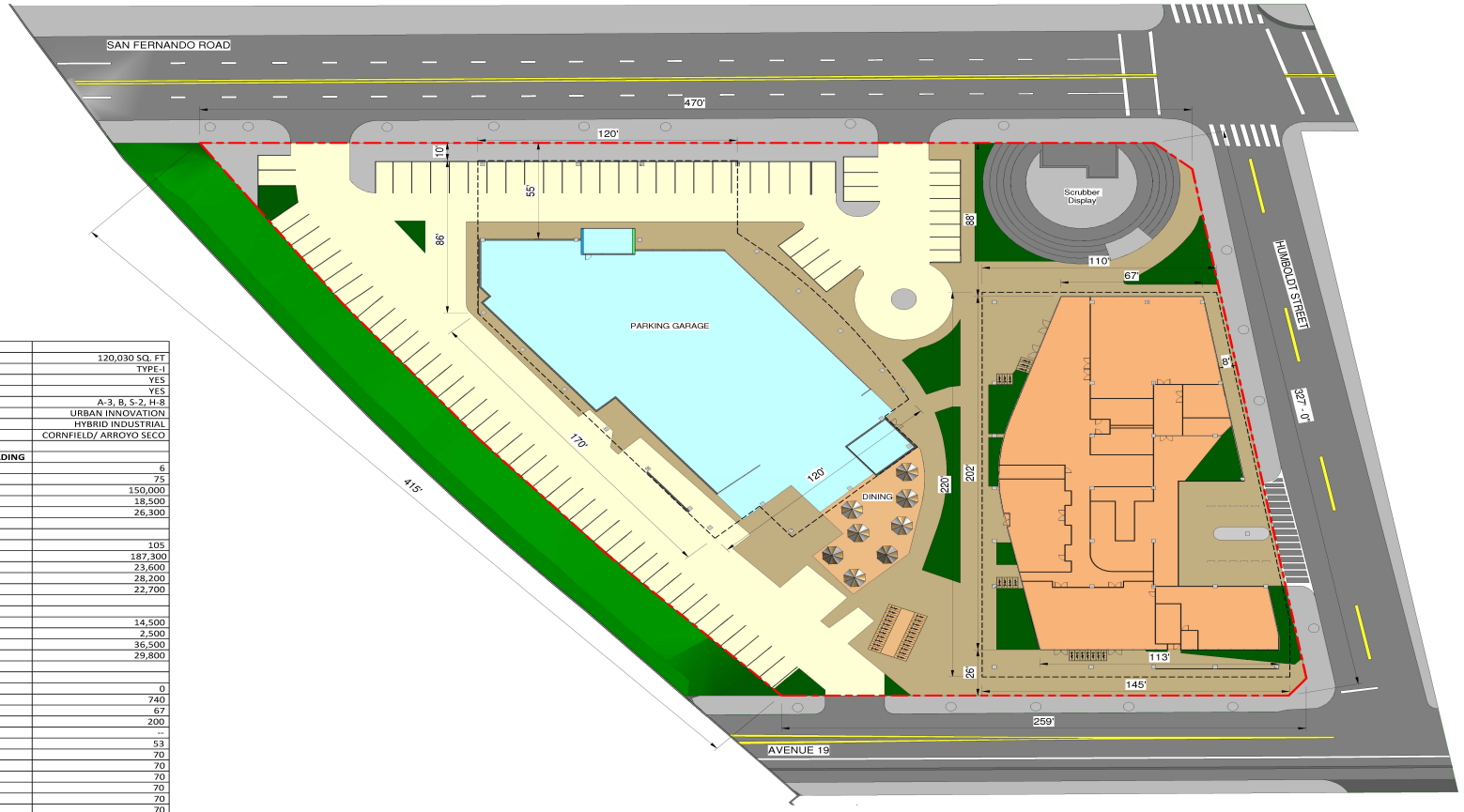
The CWC is proposed to be designed in a contemporary architectural style and may be constructed with either steel column and beam construction methodology or by building a concrete structure and reinforcing with steel. Windows may be intersected by vertical elements that extend from above the ground floor to the rooftop. These architectural elements and varied surface materials will provide vertical articulation which would diminish the building planes, reducing visual mass of the building.

The building will have office space for up to approximately 480 LASAN employees as well as conference rooms, men's and women's restrooms, laboratory, evidence and sample storage, data center, and an emergency operations center.

The Project will install a new transmission water main and appurtenances for the CWC. The new pipeline installation using approximately 10-inch diameter earthquake-resistant ductile iron pipe will be inspected and tested according to Los Angeles Department of Water and Power (LADWP) standards.

New electrical and water will be installed and connected to a Los Angeles Department Water and Power owned transformer. Electric connections to transformers and switchgear will be coordinated with LADWP.

[2] Figure 2 shows the conceptual site plan. The Project is in the conceptual design phase. As the Project moves forward in design, a detailed site plan will be developed.



GROUND LEVEL

SCALE: 1" = 30'-0" 0" 15' 30' 60'

PROPERTY AND BUILDING SUMMARY	
PROPERTY SIZE (ALL THREE PARCELS)	120,030 SQ. FT
CONSTRUCTION TYPE	TYPE-I
SPRINKLER	YES
FIRE ALARM	YES
OCCUPANCY GROUP	A-3, B, S-2, H-8
ZONING	URBAN INNOVATION
GENERAL PLAN LAND USE	HYBRID INDUSTRIAL
SPECIFIC PLAN AREA	CORNFIELD/ ARROYO SECO
CLEAN WATER CAMPUS ADMINISTRATION BUILDING	
NUMBER OF STORIES	6
HEIGHT (FT – AVERAGE ABOVE GRADE)	75
TOTAL AREA (SQ. FT)	150,000
FIRST FLOOR AREA (SQ. FT)	18,500
FLOORS 2-6 AREA (SQ. FT)	26,300
ABOVE GRADE PARKING STRUCTURE	
HEIGHT (FT - AVERAGE ABOVE GRADE)	105
TOTAL AREA (SQ. FT)	187,300
FIRST LEVEL AREA (SQ. FT)	23,600
LEVELS 2-6 AREA (SQ. FT)	28,200
LEVEL 7 AREA (SQ. FT)	22,700
OPEN AREAS	
LANDSCAPED AREA (SQ. FT)	14,500
DINING AREA (SQ. FT)	2,500
PARKING AREA (SQ. FT)	36,500
HARDSCAPED AREA (EXCLUDING DINING)	29,800
PARKING SUMMARY	
REQUIRED	0
TOTAL PARKING PROVIDED BY PROJECT	740
SURFACE PARKING	67
BASEMENT LEVEL 1	200
BASEMENT LEVEL 2 (NOT USED)	--
UPPER LEVEL 1 (GROUND LEVEL)	53
UPPER LEVEL 2	70
UPPER LEVEL 3	70
UPPER LEVEL 4	70
UPPER LEVEL 5	70
UPPER LEVEL 6	70
UPPER LEVEL 7	70
BICYCLE PARKING	
SHORT-TERM BICYCLE PARKING REQUIRED	15
SHORT-TERM BICYCLE PARKING PROVIDED	20
LONG-TERM BICYCLE PARKING REQUIRED	30
LONG-TERM BICYCLE PARKING PROVIDED	30

Los Angeles Sanitation and Environment
Clean Water Campus

Conceptual Site Plan

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

Piping systems for water, sewer, gas, and stormwater will be installed and connected to trunk lines in the adjacent streets.

The on-site laboratory will be used by the Industrial Waste Management Division and Watershed Protection Division for sampling suspended solids, biological oxygen demand, and metals. The on-site laboratory will store and handle small amounts of potentially hazardous materials including acids, bases, and other corrosive materials.

A standby diesel generator will be onsite that will be used in the event of a power outage. Approximately 500 gallons of diesel fuel will be stored on site.

2.2.2 Parking

Up to 740 parking stalls will be provided by the Project which will include a combination of below grade, grade (street) level, and above grade multi-level structure parking. LASAN will require up to 540 parking stalls, including 420 for staff, 90 for maintenance vehicles that will be parked onsite overnight, and 30 for visitor parking. The parking facilities will be used primarily by LASAN staff and maintenance vehicles; all additional parking spaces may be used by the public. Up to 200 additional parking stalls are anticipated to be used by the public and/or the Lincoln Heights Jail Adaptive Reuse Project.[3]

2.2.3 Below Grade Parking Structure

As currently proposed, the below grade parking structure will be two levels, with the capacity of up to 400 vehicles. There will be one entrance/exit located on North San Fernando Road. The first level of parking below grade (B1) will be approximately level with the below grade portions of the CWC building at the point of intersection. Clear overhead height of the B1 level parking will be high enough to accommodate the LASAN Lab Department Panel Trucks or approximately 15 feet high. The clear overhead height of the second level of parking below grade (B2) shall be set to meet local building codes, and provide clear height that will accommodate passenger cars, pick-up trucks, and passenger vans.

The below grade parking structure driveway aprons accessing adjacent streets will have at least a 20-foot span separating from another driveway apron. The structure will include a fully automated anti-pass back access control system with off-site management capabilities at the minimum utilizing the HID, or similar card.

2.2.4 Above Grade Parking Structure (Option 1)

As currently proposed the CWC above-grade parking structure Option 1 will be located north of the CWC building, on six levels, and will have the capacity of approximately 260 vehicles. The parking structure will have two entry/exit driveways: one from North San Fernando Road and one at North Avenue 19. Additionally, the parking structure will have one entry/exit point near North Avenue 19. Because the above-grade parking structure may be partially leased parking spaces focusing on public and nearby development off the CWC, this structure may have stacked parking

[3] The Lincoln Heights Jail Adaptive Reuse Project is in the preliminary conceptual design phase and has independent utility from the CWC Project.

or tandem parking to increase capacity, adding an additional 40 parking spaces. The above-grade parking structure will have nine electric charging stations, or as directed by local building code upon construction. The charging stations may be placed inside the above-grade parking structure or at grade level.

2.2.5 Above Grade Parking Structure (Option 2)

The above grade parking structure Option 2 would consist of additional above-grade parking and fewer below grade parking areas than Option 1. With the Option 2, there would be one level of below-grade parking and up to eight above-grade parking levels. The number of total parking stalls will remain at 740. This Project Description includes both the currently proposed parking structure with two below-grade levels and six above-grade levels as well as the alternative arrangement with one below-grade and seven above-grade levels.

2.2.6 Infrastructure and Roadways

In addition to the CWC building and parking structures, the proposed Project also entails construction of infrastructure and roadways for ingress and egress, emergency services vehicle access, and pedestrian sidewalks and walkways. Entrances for employees will be from Humboldt Street and North San Fernando Road.

Fire Department access will be provided on North San Fernando Road and North Avenue 19.

2.2.7 Compliance with CASP

The CWC is located within the CASP planning area. Therefore, the building and facilities must follow the specific planning and design standards identified in the CASP and by the Los Angeles Department of City Planning or request Exceptions. The CWC will be in compliance with the following design standards and zoning regulations:

- The height of the building will be limited so that the highest occupied floor is 75 feet or less above the lowest level of fire department access. The building shall not be High Rise as defined by IBC 2018.
- The maximum average building height is limited to 75 feet above grade. Because the CWC will be 6 stories above grade, and higher than 75 feet, the above grade parking structure will be lower than 75 feet, so that the average of the two buildings will be 75 feet or less. LASAN has a small ‘Scrubber’ structure on the site, but that structure was interpreted by the Planning Department to ‘not be a building’. Therefore, the height and size of the Scrubber building was construed as not applying to the average building height on the CWC site.
- Building Setbacks design for the CWC building will comply with CASP requirements for Urban Innovation sites for Professional Office. Ground floor and entrance areas are allowed additional setback distance.
- Lot Coverage in an Urban Innovation Site can be up to 85 percent of the site area.

It is anticipated that the proposed Project will require several Exceptions to the CASP including:

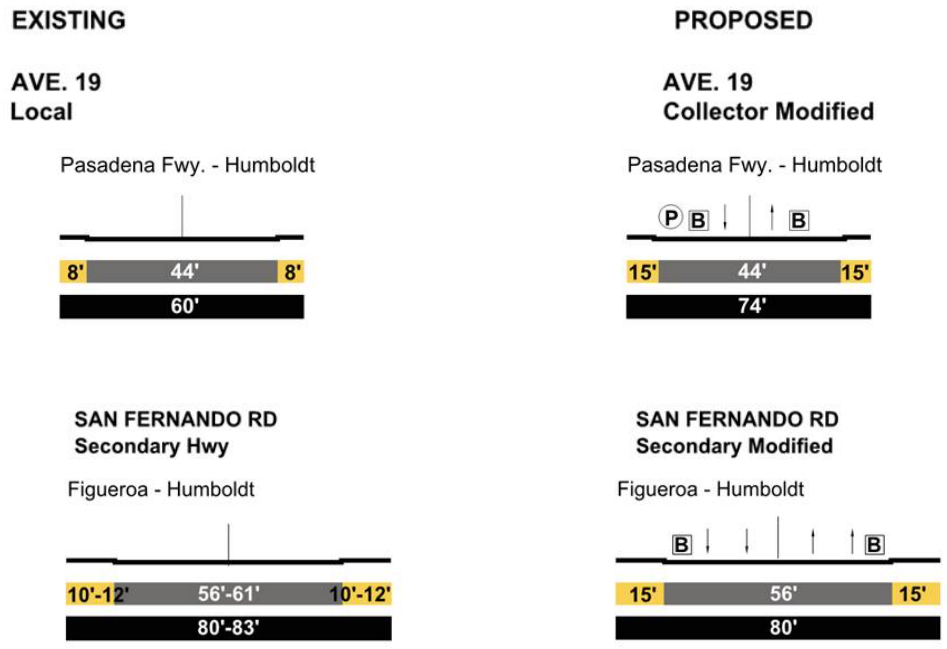
- Setback from North San Fernando Road – The CASP allows 0 to 15 feet setback from all streets. The project will achieve the required setback requirements on Humboldt and Avenue 19; however, the CWC will be offset more than 15 feet from North San Fernando due to the existing 96-inch and 60-inch sewers on the east side of the LASAN owned property.

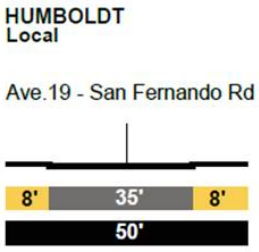
- Curb Cuts – The CASP prohibits curb cuts on Secondary Modified Collector Streets such as North San Fernando Road and Collector Modified Streets such as North Avenue 19. There are currently three curb cuts on North San Fernando Road, one of which is actively used for vehicular traffic. The proposed Project will install a total of two curb cuts on North San Fernando, one approximately at the same location as one of the existing curb cuts and a second one further south than any of the other curb cuts. There are currently three curb cuts on Avenue 19, all of which are actively used for vehicular traffic. The proposed Project will install one curb cut on Avenue 19 approximately at the location of the existing northern most curb cut.
- Building Heights - According to the CASP, the maximum average building height on this site is limited to 75 feet above grade. The CWC building is planned to be six stories and approximately 90 feet above grade. The adjacent parking structure is planned to be a maximum of eight stories and up to approximately 105 feet above grade.

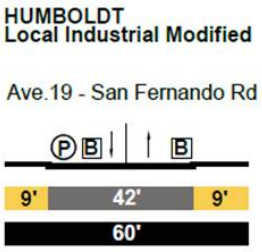
2.2.8 Street Dedications

The CASP identifies the existing and proposed street widths. To meet the CASP, the proposed Project will dedicate 7 feet of frontage for North Avenue 19 expansion and 5 feet of frontage for Humboldt Street expansion. No dedication is required on North San Fernando Road; however, the sidewalk would be widened from 12 feet to 15 feet. The anticipated dedications are illustrated below on Figure 3.

Figure 3 Street Dedications







2.2.9 Anticipated Approvals

- Land Acquisition agreements for Goodwill property (APN 5447-007-009), including Purchase Sale Agreement – City Council
- Exclusive Negotiating Agreement – Board of Public Works
- Development agreements for development of the Project and site, including Public Private Partnership Agreement (the exact form of which is subject to negotiation) – Board of Public Works and City Council
- CASP approvals, including adjustments/exceptions – Department of City Planning
- Grading Permit-City of Los Angeles Department of Building and Safety
- Bureau of Engineering B Permit
- Bureau of Engineering Excavation Permit
- Bureau of Engineering Sewer “S” Permit
- Building and Safety Permits
- General Construction Permit – Los Angeles Regional Water Quality Control Board (as required under National Pollution Discharge Elimination System [NPDES] General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities
- Street Tree Removal Permits
- Night time/After-Hours Noise Variance
- Traffic Control/Temporary Lane Closure

2.2.10 Construction Methods

The construction of the proposed Project, including demolition, would take approximately 24 months. Construction activities associated with the proposed Project would be undertaken in three main steps: (1) demolition/site clearing, (2) excavation and below-grade structure construction, and (3) above grade structures construction. Construction of the proposed Project would commence with demolition and site-clearing activities. All existing improvements on the Project site would be removed except for the existing sewer pipe underneath the property and scrubber complex located on the southeast part of the property. The scrubber complex may be relocated as part of the proposed Project.

2.2.11 Demolition and Site Clearing

The Project site is currently used for parking, storage, and staging and is partially paved with asphalt pavement. Approximately 57,000 square feet is paved with asphalt that will be demolished and off hauled to the Central Los Angeles Recycling and Transfer Station (CLARTS) or other appropriate landfill for recycling and disposal.

2.2.12 Excavation

Excavation activities for the below grade parking structure will be completed following demolition and site clearing. Approximately 68,000 cubic yards of soil and soil debris will be off hauled from the site to provide for a 60,000 square feet 30 feet deep excavation for the parking structure.

2.2.13 Below Grade Parking Structure

The parking structures will be constructed using formwork and cast-in-place concrete. Limited space onsite may require staging at other nearby locations while excavation is taking place. Additionally, sidewalks and one lane of traffic may be closed during portions of the construction.

2.2.14 CWC Building

The CWC building will be constructed using a combination of steel, cast-in-place concrete, and tilt up wall design. The building will have a steel-framed, concrete foundation. The exterior will include an aluminium and glass curtain wall.

2.2.15 Stormwater

The construction of the proposed Project will result in approximately 100,000 square feet of impervious surface, which is approximately 40,000 square feet more than the existing site. The stormwater drainage system for the CWC building and parking structures will be designed to be capable of handling 2 inches of rainfall per hour without causing flooding or ponding on floors or roofs. Stormwater will be collected onsite and will be filtered and retained before discharging into the public stormwater system per City of Los Angeles Public Works Department policies including requirements of the Standard Urban Water Mitigation Plan. Alternatively, onsite stormwater may be captured, filtered, and infiltrated to the groundwater. The proposed Project landscaping will comply with the LASAN's Low Impact Development Handbook (LID) to comply with the NPDES Municipal Separate Storm Sewer System (MS4) permit for stormwater and non-stormwater discharges within coastal watersheds in Los Angeles County (Permit CAS004001, Order No. R4-2012-0175).

2.2.16 Construction Schedule

Construction is expected to begin in 2023 and occur over the course of 24 months. Work would occur Monday through Friday between 6:00 am and 4:30 pm. Regular night work or weekend work is not anticipated. However, some night work may be required during some phases of the project (i.e., concrete pouring) to maintain construction schedule.

Table 2. Workers and Construction Vehicles by Activity

Activity	Calendar Days	Number of Workers per day	Number of Construction Vehicles per day	Concurrent Work
Mobilization	30	10	5	
Demolition	30	20	10	
Excavation	120	50	20	
Subterranean Parking Structure	150	50	30	

Activity	Calendar Days	Number of Workers per day	Number of Construction Vehicles per day	Concurrent Work
Above Grade Office Building	150	60	15	
Above Grade Parking Structure	90	40	15	Concurrent with Above Grade Office Building
Final Site Grading/paving/landscaping/etc.	60	30	15	
MEP	120	40	10	Concurrent with Site Grading/Paving/landscaping
FF&E	60	40	10	
Closeout	30	10	5	
Total Duration	**690**			

2.2.17 Dust Control

A dust control plan will be prepared for construction of the proposed Project. In general, dust will be controlled using watering trucks that will spray exposed soils to prevent dust on and off the proposed Project site. Stabilized entrance / exits will also be included to prevent dirt tracking on the roadway.

2.2.18 Night Work and Lighting

In general, construction operations will occur during daylight hours. However, specific activities such as concrete pouring may require night work. Where night work occurs, lighting may be necessary to provide a safe work environment. All lighting will be situated to avoid lighting impacts on the surrounding area with lights directing downward to the work area and only for durations necessary to safely complete the task at hand. Security lighting will also be included on the site throughout construction, which will also be directed downward.

2.2.19 Traffic Control

The proposed Project will involve the use of heavy machinery, delivery of materials and the off hauling of demolition and excavation debris. The proposed Project will generate approximately 8,400 one-way truck trips during off hauling of debris and delivery of materials and concrete to the site. Over the course of the 24-month Project, average daily truck trips will be approximately 12 truck trips per day but can be as many as 30 trucks per day at certain times during construction.

Table 3. Truck Trip Generation

Activity	Export	Import	Estimated One-way Truck Trips
Demolition & Grading	2,000 (cy)		120
Excavation	68,000 (cy)		3,780
Concrete		25,000 (cy)	2, 500
Material Delivery			2,000
Total	70,000 (cy)		8,400

The specific haul route has not been finalized but in general, trucks will use Interstate 5 and State Route 118 and then travel on surface streets to and from the Project Site. Within the Project vicinity, Pasadena Avenue is a designated truck route and is a connector to North Avenue 19 and North San Fernando Road.

2.2.20 Landscaping

The project will be landscaped in accordance with the Arroyo Seco CASP including maintaining a minimum of one square foot of open space for every 48 square feet of non-residential space. The landscaping will use drought tolerant plants and at least 75 percent of the newly landscaped areas will be planted with either indigenous native trees, plants, and/or shrubs and/or species as defined by the Los Angeles County's River Master Plan's Landscaping Guidelines and Plant Palettes and/or Watershed Friendly Plants.

2.2.21 SB 743 Transit-Oriented Infill Development (Public Resources Code Section 21099)

The CWC qualifies for exemption from analysis of parking and aesthetics under CEQA because it meets the requirements of a transit-oriented infill development under Senate Bill 743 as described below. (Public Resources Code Sections 21099(a(d)(1).)

Among other provisions, Senate Bill 743 specified that aesthetics and parking no longer need to be considered significant impacts on the environment if the project is a residential, employment center, or mixed-use project and the project is located in an infill development and within a transit priority area.

Table 4 below identifies the specific terms and requirements of the SB 743 transit-oriented infill exemption and how the CWC complies with all of the requirements as set forth below in Table 4.

Table 4. Summary of CWC Compliance with SB 743 Transit-Oriented Infill Development Requirements

Term	SB 743 definitions	CWC compliance
Infill Site	**Located within an urban area that has been previously developed** or on a vacant site where at least 75 percent of the perimeter adjoins or is separated by an improved public	The site for the CWC has been previously developed since approximately 1906. The LASAN parcel is currently being used for materials storage. The Goodwill

	right-of-way from, parcels that are developed with qualified urban uses	parcel is being used for employee parking.
Employment Center Project	A project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area	The CWC site is zoned urban innovation which includes corporate headquarters, repair and maintenance facilities, commercial office space (ancillary) as allowable uses. It is anticipated that the CWC will have a minimum of a 1.50:1 floor area ratio (FAR) without including parking. If parking is included, the FAR would be up to approximately 3.15:1. The CWC is within a transit priority area as defined below
Transit Priority Area	In area within one-half mile of a **major transit stop** that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations	The CWC is located within ½ mile of the Lincoln Heights/Cyprus Park Metro Gold Line Station and the 68, 84, 28 and 251 bus stops are located within 1 to 2 blocks of the CWC. The Lincoln Heights/Cyprus Park Station is located approximately 0.29 miles from the CWC.
Major Transit Stop	A site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods	There is one LA Metro Station and at least 4 separate bus lines within walking distance of the CWC. The current schedule for the LA Metro Gold Line and buses 84, 68, 28, and 251 buses are shown at a minimum 10 minute or less interval during morning and afternoon peak commute periods. The Lincoln Heights/Cyprus Park Station runs approximately every 7 minutes during peak commute times and 12 minutes during non-peak commute times.

Because development of the CWC meets the requirements of SB 743 Transit-Oriented Infill Development, impacts associated with aesthetics and parking are not considered to be significant under CEQA. Therefore, no analysis on potential impacts aesthetics or parking is provided in this Addendum.

Environmental Checklist

I. Agricultural Resources

		Impact relative to the certified 2013 FEIR determinations			
Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
2.	**AGRICULTURE RESOURCES**				
	Would the project:				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	☐	☐	☐	☒

Setting

The following definitions are used in this section, are derived from United States Department of Agriculture, and are described in 7 Code of Federal Regulations (CFR) section 657.5.

Prime Farmland: Farmland that has the best combination of physical and chemical features that can provide long-term agricultural production. This land has soil quality, growing season, and moisture supply to produce sustained high yields.

Farmland of Statewide Importance: Land similar to Prime Farmland but may have greater slopes or lower moisture supply.

Unique Farmland: Land that contains lesser quality soils used for sustained agricultural production. This land is usually irrigated but may include non-irrigated land.

Forest Land: “Forest land” is land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions and that allows for management of one or more forest resources including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (Public Resources Code 12220[g]).

Timberland: “Timberland” means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for and capable of growing a crop of trees of any commercial species used to produce lumber and other forest products including Christmas

trees. Commercial species will be determined by the board on a district basis after consultation with the district committees and others (Public Resources Code 4526).

Timberland Production Zone: “Timberland production zone” (TPZ) means an area zoned pursuant to California Government Code Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses (California Government Code 51104[g]).

Discussion

a-e) No Impact. There are no agricultural lands or timber harvest resources within the proposed Project area and the proposed Project area is not zoned for agricultural or timber use. There are no lands under a Williamson Act contract or designated as forested lands, timberlands, or zoned as Timberland Production. While the 2013 FEIR did not analyze agricultural or timber harvest resources, no such resources occur within the CASP planning area and there would be no impact on agricultural or timber resources.

The 2013 FEIR is consistent with the above analysis and the conclusion that there would no impacts on agricultural or timber forest resources. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

II. Air Quality

		Impact relative to the certified 2013 FEIR determinations			
	Issues (and Supporting Information Sources):	***Potentially Significant Impact***	***Less Than Significant with Mitigation Incorporation***	***Less Than Significant Impact***	***No Impact***
3.	**AIR QUALITY**				
	Would the project:				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality?	☐	☐	☒	☐
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Setting

The proposed Project area is located within the boundaries of the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) is the regional agency with regulatory authority over stationary sources in the SCAB, while the California Air Resources Board (CARB) has regulatory authority over mobile sources, such as construction equipment, trucks, and automobiles, throughout the state. The SCAQMD has the primary responsibility to meet and maintain the state and federal ambient air quality standards in the SCAB.

Pursuant to the Clean Air Act Amendments of 1990, the United States Environmental Protection Agency (USEPA) has established National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The NAAQS are classified as primary and secondary standards. Primary standards prescribe the maximum permissible concentration in the ambient air and are required to protect public health. Secondary standards specify levels of air quality required to protect public welfare, including materials, soils, vegetation, and wildlife, from any known or anticipated adverse effects. NAAQS are established for six pollutants (known as criteria pollutants): ozone (O_3), particle pollution (i.e., respirable particulate matter less than 10 microns in diameter [PM_{10}] and respirable particulate matter less than 2.5 microns in diameter [$PM_{2.5}$]), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). The CARB has also established its own air quality standards in the State of California, known as the California Ambient Air Quality Standards (CAAQS). The CAAQS are generally more stringent than the NAAQS and include air quality standards for all the criteria pollutants listed under NAAQS plus sulfates (SO_4), hydrogen sulfide (H_2S), vinyl chloride, and visibility-reducing particulate matter.

The USEPA classifies the air quality within an Air Quality Control Region with regard to its attainment of federal primary and secondary NAAQS. According to USEPA guidelines, an area with air quality better than the NAAQS for a specific pollutant is designated as being in attainment for that pollutant. Any area not

meeting the NAAQS is classified as a nonattainment area. Where there is a lack of data for the USEPA to determine attainment or nonattainment status, the area is designated as unclassified and is treated as an

attainment area until proven otherwise. Similarly, the CARB makes state area designations for the state criteria pollutants.

Both the State and Federal Clean Air Acts require areas to be classified as either attainment or nonattainment for each criteria pollutant based on whether or not the state and national standards have been achieved. Therefore, areas in California have two sets of attainment/non-attainment designations: one for federal standards and one for state standards. As presented in Table 5, the SCAB exceeds federal standards for O_3, $PM_{2.5}$ and Pb (only in the Los Angeles portion of the basin) and state standards for O_3, PM_{10} and $PM_{2.5}$.

Table 5. NAAQS, CAAQS, and SCAB Attainment Status

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Status	Concentration[3]	Status
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	Nonattainment	—	—
	8 Hours	0.070 ppm (137 µg/m^3)	Nonattainment	0.070 ppm (137 µg/m^3)	Nonattainment
Respirable Particulate Matter (PM_{10})	24 Hours	50 µg/m^3	Nonattainment	150 µg/m^3	Attainment
	AAM	20 µg/m^3	Nonattainment	—	—
Fine Particulate Matter ($PM_{2.5}$)	24 Hours	—	—	35 µg/m^3	Nonattainment
	AAM	12 µg/m^3	Nonattainment	12.0 µg/m^3	Nonattainment
Carbon Monoxide (CO)	8 Hours	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment
	1 Hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
Nitrogen Dioxide (NO_2)	AAM	0.030 ppm (57 µg/m^3)	Attainment	0.053 ppm (100 µg/m^3)	Attainment
	1 Hour	0.18 ppm (339 µg/m^3)	Attainment	0.100 ppm (188 µg/m^3)	Attainment
Sulfur Dioxide (SO_2)	24 Hours	0.04 ppm (105 µg/m^3)	Attainment	0.14 ppm (365 µg/m^3)	Attainment
	1 Hour	0.25 ppm (655 µg/m^3)	Attainment	0.075 ppm (196 µg/m^3)	Attainment
	AAM	—	—	0.030 ppm (80 µg/m^3)	Attainment
Lead (Pb)	30-Day Average	1.5 µg/m^3	Attainment	—	—

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Status	Concentration[3]	Status
	Calendar Quarter	—	—	1.5 µg/m^3	Attainment
	Rolling 3- Month Average	—	—	0.15 µg/m^3	Nonattainment
Sulfates	24 Hours	25 µg/m^3	Attainment		
Hydrogen Sulfide (H_2S)	1 Hour	0.03 ppm (42 µg/m^3)	Attainment		
Vinyl Chloride	24 Hours	0.010 ppm (26 µg/m^3)	Attainment		

Source: SCAQMD 2016.
Acronyms: mg/m^3 = milligrams per cubic meter; ppm = parts per million; µg/m^3 = micrograms per cubic meter; AAM = Annual Arithmetic Mean; CARB = California Air Resources Board; NAAQS = National Ambient Air Quality Standards

To pursue improvement of air quality in the SCAB, SCAQMD has prepared an Air Quality Management Plan (AQMP), which is generally updated every three years. The 2016 AQMP is SCAQMD's most recent plan update and represents a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures. The plan seeks to achieve multiple goals in partnership with other entities promoting reductions in criteria pollutant, GHGs, and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP also includes transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2016 Regional Transportation Plan/ Sustainable Communities Strategy. The 2016 AQMP includes the integrated strategies and measures needed to meet the NAAQS. On March 3, 2017, SCAQMD approved the 2016 AQMP that demonstrates attainment of the 1-hour and 8-hour ozone NAAQS as well as the latest 24-hour and annual PM2.5 standards.

The SCAB monitoring station located nearest to the proposed Project site is the Los Angeles – North Main Street monitoring station located approximately 1 mile southwest of the proposed Project site. Table 6 indicates the number of days each of the standards has been exceeded at this station in each of the last three years for which data is available.

Table 6. Criteria Air Pollutants Data Summary

Pollutant	Averaging Time	Applicable Standard	2017	2018	2019
Ozone (O_3)	1-Hour	Maximum Concentration (ppm)	0.116	0.098	0.093
		Days > CAAQS (0.09 ppm)	6	2	0
	8-Hour	4th Maximum Concentration (ppm)$_a$	0.080	0.072	0.065
		Days > NAAQS (0.075 ppm)	14	4	2
		Days > CAAQS (0.07 ppm)	16	4	2
		Maximum Concentration (µg/m$_3$)	96.2	81.2	93.9

Pollutant	Averaging Time	Applicable Standard	2017	2018	2019
Particulate Matter (PM_{10})	24-Hour	Days > CAAQS (50 µg/m3) Days > NAAQS (150 µg/m3)	40 0	31 0	15 0
	Annual	State Annual Average (20 µg/m3)	25.7	30.2	23
Particulate Matter ($PM_{2.5}$)	24-Hour	Maximum Concentration (µg/m3) Days > NAAQS (35 µg/m3) National Std. 98th Percentile b	61.7 6.1 30.9	65.3 6.3 34.1	43.5 1.0 28.3
	Annual	National Annual (12.0 µg/m3)c	12.0	12.8	10.8
Carbon Monoxide (CO)	1-Hour, 8-Hour	Maximum Concentration (ppm)	*	*	*
Nitrogen Dioxide	1-hour	Maximum Concentration (ppm) Days > CAAQS (0.18 ppm)	0.081 0	0.070 0	0.070 0
(NO_2)	Annual	Arithmetic Average (0.053 ppm)	0.020	0.018	0.018

Insufficient data available to determine the value
Source: ARB Top Four Summary available at http://www.arb.ca.gov/adam/topfour/topfour1.php

The SCAQMD has developed specific numeric thresholds that apply to projects within the SCAB (SCAQMD 2019). The SCAQMD has established the following significance thresholds for temporary construction activities within the SCAB:

- *75 pounds per day of VOC*
- *100 pounds per day of NO_X*
- *550 pounds per day of CO*
- *150 pounds per day of SO_X*
- *150 pounds per day of PM_{10}*
- *55 pounds per day of $PM_{2.5}$*

The SCAQMD has also established the following significance thresholds for long-term project operation within the SCAB:

- *55 pounds per day of VOC*
- *55 pounds per day of NO_X*
- *550 pounds per day of CO*
- *150 pounds per day of SO_X*
- *150 pounds per day of PM_{10}*
- *55 pounds per day of $PM_{2.5}$*

Localized Significant Thresholds (LSTs) have been developed for emissions within construction areas up to 5 acres in size. The SCAQMD provides lookup tables for project sites that measure 1, 2, or 5 acres. The proposed Project site is approximately 4 acres and is located in Source Receptor Area 1 (SRA 1) (SCAQMD 2008). LSTs for construction on a 4-acre site in SRA 1 are shown in Table 7. LSTs are provided for receptors at a distance of 25 to 500 meters from the proposed Project site boundary. The sensitive receptor closest to the proposed Project site is residences adjacent to the Proposed Project site boundary. According to the SCAQMD's publication Final LST Methodology, projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.

Table 7. SCAQMD LSTs for SRA-1 for Receptor 25 Meters Away (lbs/day)

Pollutant	Construction	Operational
NO_x	143	143
PM_{10}	13	3
$PM_{2.5}$	7	2
CO	1,590	1,590

Discussion

a) Less than Significant Impact. Criteria for determining consistency for the AQMP is defined in the CEQA Air Quality Handbook (1993). There are two key indicators of consistency:

Consistency Criterion No. 1: Whether the project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP

Consistency Criterion No. 1 refers to violations of NAAQS and CAAQS. SCAQMD recommends an air quality modeling analysis be performed to identify project impacts. In order to be found consistent with Consistency Criterion No. 1, the analysis will need to demonstrate that project emissions will not increase the frequency or severity of existing violations or cause or contribute to new violations. As discussed below in II.b, project and operation would result in emissions below regional and localized thresholds crafted to bring the area into attainment (regional thresholds) and to ensure no violations of NAAQS and CAAQS occur locally (localized thresholds). Therefore, the project complies with Consistency Criterion No. 1.

Consistency Criterion No. 2: Whether the project will exceed the assumptions in the AQMP or increments based on the year of project build-out and phase?

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local city general plans and the SCAG Regional Transportation Plan socioeconomic forecast projections of regional population, housing, and employment growth.

The proposed Project involves the construction of an office building, which has the potential of indirectly increasing the City's population. According to data provided by the California Department of Finance (DOF), the estimated population of the City of Los Angeles is 3,923,341 (DOF 2021). As the Proposed Project would involve the construction of office space for 480 employees, it could potentially add 480 residents. SCAG forecasts that the population of the City of Los Angeles will increase by 837,500 new residents between 2016 and 2045, for a total of 4,771,300 residents in 2045 (SCAG, 2020). The addition of 480 new residents to the City of Los Angeles would equal 0.06 percent of the City's total projected population growth through 2045. The level of population growth associated with the proposed Project was anticipated in SCAG's long-term population forecasts and would not exceed official regional population projections. Therefore, the proposed Project would not generate growth beyond AQMP forecasts.

The 2013 FEIR pre-dated the 2016 AQMP, and 2013 FEIR analysis of impacts on applicable air quality plans was based on the then-effective 2007 AQMP. However, as shown above, the proposed Project would result in less than significant impacts under the 2016 AQMP and would not result in a different impact conclusion from the 2013 FEIR.

b) Less than Significant Impact. Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction vehicles and soil hauling trucks. Construction would generally consist of site clearing, excavation, construction of the building foundation and pad, and erection of the proposed structures.

Table 8 summarizes the estimated maximum daily emissions of pollutants during each year or activity of the construction period with compliance with the above-described requirements, but without any additional mitigation.

Table 8. Estimated Construction Maximum Daily Air Pollutant Emissions (lb/day)

Year/Activity	CO	VOCs	NOx	SOx	PM_{10}	$PM_{2.5}$
Regional Emissions						
2023	22	2.7	27.6	0.0652	8.53	5.10
2024	42	3.8	36.6	0.113	8.50	5.06
Significance Threshold	550	75	100	150	150	55
Significant?	No	No	No	No	No	No
Localized Emissions						
Demolition	30.5	NT	48.6	NT	2.5	2.1
Grading	21.6	NT	33.0	NT	4.1	2.0
Building	24.2	NT	29.6	NT	1.7	1.6
Paving	14.0	NT	18.6	NT	1.2	1.1
Significance Threshold	1,590	NT	143	NT	13	7
Significant?	No	NA	No	NA	No	No

Based upon the quantified estimates provided in Table 8, no exceedance of any of the criteria pollutants are anticipated.

The proposed Project would result in net increases in long-term stationary and mobile source emissions as summarized in Table 9. Potential project related stationary source emissions include the use of consumer products, natural gas consumption for heating, standby generator use, landscape equipment, general energy, and solid waste. Operational emissions associated with mobile sources were based on the default motor vehicle trip generation factors included in the CalEEMod model (Appendix B). Table 9 shows that the increase of all criteria pollutants as a result of the proposed Project would not exceed the corresponding SCAQMD daily emission thresholds for any criteria pollutants.

Table 9. Estimated Regional Operational Emissions (lb/day)

Source	CO	VOCs	NOx	SOx	PM_{10}	$PM_{2.5}$
Regional Emissions						
Area	0.104	2.91	9.50×10^{-4}	1.00×10^{-5}	3.70×10^{-4}	3.00×10^{-4}
Energy	0.289	0.0378	0.344	2.06×10^{-3}	0.0261	0.0261
Mobile	22.0	1.96	4.42	0.0587	5.86	1.597
Stationary	14.3	3.94	11.0	0.0189	0.579	0.579
Total	**36.7**	**8.85**	**15.8**	**0.0797**	**6.47**	**2.20**

Significance Threshold	550	55	55	150	150	55
Significant?	No	No	No	No	No	No
Localized Emissions						
Area	0.104	2.91	$9.50x10^{-4}$	$1.00 x10^{-5}$	$3.70 x10^{-4}$	$3.00 x10^{-4}$
Energy	0.289	0.0378	0.344	$2.06 x10^{-3}$	0.0261	0.0261
Stationary	14.3	3.94	11.0	0.0189	0.579	0.579
Total	**14.7**	**6.89**	**11.3**	**0.0189**	**0.605**	**0.605**
Significance Threshold	1,590	NT	143	NT	3	2
Significant?	No	NA	No	NA	No	No

The 2013 FEIR analysis of impacts on criteria pollutants was based on the AQMD thresholds in effect in 2011 and concluded that in certain instances impacts from CASP implementation would be significant and unavoidable, despite imposition of all feasible mitigation measures. However, as shown above, the proposed Project would result in less than significant impacts under the current thresholds, and therefore the proposed Project would be within the scope of the analysis of the 2013 FEIR.

c) **Less than Significant Impact.** Typical sensitive receptors include inhabitants of long-term healthcare facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities. The proposed Project is located largely in urban areas, which may include some of the listed sensitive receptors. Substantial amounts of dust are not expected from maintenance activities, as fugitive dust emissions will be controlled by implementing required actions to prevent or reduce excessive fugitive dust emissions. This includes requiring regular watering and other dust-preventive measures during clearing, grading, earth-moving, or excavation operations. Use of diesel-powered equipment has the potential to emit toxic air contaminant (TAC) such as diesel particulate matter (DPM). Besides DPM, additional TACs result from gasoline combustion in construction equipment and vehicles. It was determined that TAC exposures from the proposed Project would not present a significant risk to human health. The results of this health risk screening analysis are presented in Table 10. A discussion of the assessment is presented in Appendix C. As shown below, both residential and worker exposure to Project emissions would be less than SCAQMD significance thresholds.

Table 10. Summary of Health Risk from Project

Type of Receptor	Cancer Risk (in a million)	Chronic Non-Cancer HI	Acute Non-Cancer HI
PMI	n/a	n/a	$1.7x10^{-2}$
MEIR	0.4	$3.8x10^{-7}$	n/a
MEIW	0.4	$1.5x10^{-2}$	n/a
Threshold	**10**	**1**	**1**
Significant?	**No**	**No**	**No**

PMI – Point of maximum impact; MEIR – maximally exposed individual at a residential receptor; MEIW – maximally exposed individual at a worker receptor.

Furthermore, as analyzed in City of Los Angeles guidance (https://planning.lacity.org/odocument/e1a00fbf-6134-4fa9-b6fd-54eee631effb/City_of_LA_-_Air_Quality_and_Health_Effects_and_Attachments.pdf), direct correlation of a project's pollutant emissions and anticipated health effects is currently infeasible, as no expert agency has approved a quantitative method to reliably and meaningfully translate mass emission estimates of criteria air pollutants to specific health effects for the scale of projects analyzed for projects such as the proposed Project.

The 2013 FEIR analysis of impacts on sensitive receptors did not expressly incorporate the above analysis and concluded that in certain instances impacts from CASP implementation would be significant and unavoidable, despite imposition of all feasible mitigation measures. However, as shown above, the proposed Project would result in less than significant impacts under the current thresholds, and therefore the proposed Project would be within the scope of the analysis of the 2013 FEIR.

d) No Impact. During maintenance, the proposed Project may result in emissions of odors due to diesel fuel exhaust from equipment and vehicles; however, it is unlikely that these odors would affect a substantial number of people. Furthermore, the State of California requires that only ultra-low sulfur diesel be sold as highway diesel fuel, further reducing any potential odors associated with the use of diesel fuel during maintenance. Therefore, the proposed Project will result in less than significant impacts under this criterion.

The 2013 FEIR is consistent with the above analysis and concluded that odor impacts from anticipated projects would not be in violation of SCAQMD Rule 402 and would be less than significant. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

III. Biological Resources

Issues (and Supporting Information Sources):	Impact relative to the certified 2013 FEIR determinations: Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES— Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Setting

The proposed Project is located in an urban setting with commercial, office, and light manufacturing buildings. The area is limited in its potential to provide suitable habitat for plants and animals. Vegetation primarily consists of ornamental landscaping including street trees and within parks, or ruderal (weedy) species found in vacant lots or along the Los Angeles River. Little, if any native vegetation occurs within the proposed Project area. Two street trees are located along North San Fernando Road and will be removed during the widening of the sidewalk.

According to the California Natural Diversity Database and the U.S. Fish and Wildlife Service Information for Planning and Consultation, there are no know occurrences of special status species within the proposed project area (Appendix D).

Discussion

a) No Impact. Generally, the proposed Project site does not provide suitable habitat for any sensitive species identified by U.S. Fish and Wildlife or California Department of Fish and Wildlife. Because of the commercial and industrial nature of the proposed Project site and surrounding land use, limited native vegetation is present to support such species.

There are 7 street trees within the proposed Project area. Five of these street trees will be removed during construction and 2 on North San Fernando Road will remain and will be protected in place during construction. These trees have the potential to support nesting birds and raptors protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) 3503.5. The MBTA makes it unlawful to take, posses, buy, sell, purchase, or barter any migratory bird listed in 50 CFR Part 10. Section 3503.5 of CFGC prohibits the take, possession, or destruction of native resident and migratory birds, or their nests or eggs. If active nests are present during tree removal, the nest could be destroyed, abandoned, and young or eggs could be injured or killed. To ensure compliance with applicable provisions in the MBTA and CFGC 3503.5, Mitigation Measure Biological Resources 1 from the 2013 FEIR will be implemented as Regulatory Compliance Measure RC-BIO-1 as a standard condition that is required by law to apply to the proposed Project.

Regulatory Compliance Measure RC-BIO-1: To avoid impacts to birds nesting onsite during construction activities the following mitigation measures list should be implemented:

Migratory nongame native bird species are protected by international treaty under the Federal MBTA of 1918 (50 CFR Section 10.13). Sections 3503, 3503.5 and 3513 of the CFGC prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed Project activities (including disturbances to native and nonnative vegetation, structures, and substrates) should take place outside of the breeding bird season which generally runs from March 1 to August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (CFGC Section 86). If project activities cannot feasibly avoid the breeding bird season, beginning 30 days prior to the disturbance of suitable nesting habitat, the applicant shall:

1. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the proposed Project site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
2. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.
3. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall

be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area**.**

4. The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the proposed Project.

With the implementation of **RC-BIO-1**, impacts related to nesting birds and raptors would be ensured to be less than significant.

The 2013 FEIR is consistent with the above analysis, including the implementation of the 2013 FEIR's mitigation measure as a regulatory compliance measure in the proposed Project and the conclusion that there would be less than significant impacts on sensitive species. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

b) No Impact. There is no riparian habitat or other sensitive natural community within the vicinity of the proposed Project. The proposed Project is located within an industrial and commercial area that has been developed since 1906. The Los Angeles River is located approximately 410 feet to the west of the site. The Los Angeles River is a concrete lined channel within the reach and does not provide suitable riparian suitable habitat. Because of the lack of riparian and sensitive habitats within the vicinity of the proposed Project area, development of the CWC would have no impacts on these habitats.

c) No Impact. There are no wetlands as defined under Section 404 of the Clean Water Act within the vicinity of the proposed Project. The Los Angeles River occurs approximately 410 feet to the western boundary of the proposed Project site. The river is a concrete-lined channel within the vicinity of the proposed Project and is not considered a Clean Water Act Section 404 jurisdictional waterway in this reach.

d) No Impact. The proposed Project area does not provide suitable habitat for any migratory fish or wildlife species. There is no habitat for migratory species and the project would not prevent the migration of any fish or wildlife species.

e) No Impact. Because the proposed Project occurs within an urban, developed area, there are not local policies or ordinances protecting biological resources that occur to the proposed Project. There are no Habitat Conservation Plans or Natural Community Conservation Plans adopted or proposed within the vicinity of the proposed Project.

Within the project area, there are a total of 7 potential street trees; 5 street trees will be removed and 2 street trees located on North San Fernando Road will remain and protected in place during construction. The species of each of these trees is currently unknown but will be evaluated prior to the start of construction. It is unlikely that these trees would be considered protected trees within the meaning of the City's Protected Tree Ordinance (Ordinance 177404, as amended), as almost all street trees that exist in improved roadway and sidewalk areas were planted and therefore excluded from the Protected Tree Ordinance.

A minimum of two trees would be planted for each street tree that is removed in compliance with the adopted Board of Public Works Street Tree Removal Permit and Tree Replacement Condition Policies (2015) which determined that the policy including replacement at the 2:1 ratio was sufficient to ensure

impacts were not adverse. Because the City's Protected Tree Ordinance does not apply to the trees within the proposed Project area, there would be no conflict with the Ordinance.

f) **No Impact**. There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans within the vicinity of the proposed Project.

IV. Cultural Resources

Issues (and Supporting Information Sources):	Impact relative to the certified 2013 FEIR determinations: Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES— Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Directly or indirectly destroy a unique paleontological resource or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Setting

A cultural resources evaluation of the CASP development area was conducted in the 2013 FEIR. For the CWC, a Cultural Resources Technical Report was prepared in 2017 (Appendix E) and an updated records search for the proposed Project area was requested from the South Central Coastal Information Center at California State University, Fullerton on November 23, 2020. The results of the search were received on December 23, 2020. The entire project area is either paved or extensively graded. No native ground survey remains; therefore, archaeological survey was not warranted. According to the previous cultural resources study for the CWC, the Project area and its surroundings have been completely developed and paved since at least 1948, and the buildings were present within the proposed Project area dating as far back as 1896, if not earlier (Kay 2017).

The updated records search indicated that there are no previous cultural resources investigations that included the proposed Project area. There is one cultural resource that overlaps the proposed Project area (P-19-003685). Site P-19-003685 is a historic-age (i.e., 50 years old or older) refuse deposit containing domestic, commercial, and industrial refuse dating from the 1920s to the 1960s. Artifacts include bricks; fragments of earthenware, stoneware, whiteware, and porcelain vessels and dishes; terra cotta pot fragments; faunal bone; glass jar and bottle fragments; glass lamp fragments; a doorknob; metal bolts and machinery parts; nails; and a railroad spike. The subsurface deposit was encountered in 2003 during utility excavations. The depth of the deposit varied from 12 inches to 54 inches below ground surface. All diagnostic items were collected in 2003. Non-diagnostic and modern materials were discarded. It is unknown if any subsurface deposits associated with this resource still remain within the project area. The resource has not been formally evaluated for eligibility to the California Register of Historical Resources (CRHR); however, the site has been extensively disturbed by the utility excavations from 2003 and likely from past development of the proposed Project area. If any materials are extant within the proposed Project site, they are unlikely to meet the eligibility criteria for inclusion in the CRHR.

Significance Criteria

A cultural resources significance is determined by its potential eligibility to be listed on the CRHR. The CRHR is a listing of properties that are important to the history of California and our nation. To be eligible for listing on the CRHR, a property must typically be 50 years of age or more; it must possess historical significance; and it must possess integrity of location, design, setting, materials, workmanship, feeling, and association. Historical significance is the importance of a property to the history, architecture, archaeology, engineering, or cultural aspects of a community. The importance of a resource is measured in terms of these criteria for inclusion on the CRHR (Title 14 California Code of Regulations, §4852[a]). A resource may be important if it meets any one of the criteria below, or if it is already listed on the CRHR or a local register of historical resources. An important historical resource is one that:

1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. Is associated with the lives of persons important to local, California, or national history.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important to the pre-history or history of the local area, California, or the nation.

Discussion

a) No Impact. There is only one built structure within the proposed Project area. According to the previous cultural resources technical study for the LASAN CWC project (Appendix E), the structure was built between 1972 and 1980 and is not historic in age (Kay 2017). Therefore, it is not a historical resource under CEQA. Because no CRHR-listed or -eligible resources have been identified within the proposed Project area, there would be no impact to known historical resources from the proposed Project. No mitigation measures are required.

b) Less than Significant Impact. One archaeological resource, Site P-19-003685, has been identified within the proposed Project area. This site has been extensively disturbed from past development and utility excavations. All diagnostic items have been collected. The remaining materials were heavily fragmented and have little or no data potential. Therefore, the site is unlikely to meet the eligibility criteria for inclusion in the CRHR and it is not considered a significant resource under CEQA.

Given the past use of the proposed Project area going back to at least the 1890s, there is a potential for additional, subsurface historic-age archaeological materials to exist within the proposed Project area. Subsurface prehistoric materials could exist below the levels of previous disturbances. To ensure potential impacts to unknown buried archaeological resources are less than significant, **RC- Cultural Resources 1(a),** as provided in the 2013 FEIR shall be implemented **as** Regulatory Compliance Measure RC-CR-1(a) as a standard condition that is required by City specifications to apply to the proposed Project:

RC-CR-1(a): Pursuant to Section 6-3.2, “Archaeological and Paleontological Discoveries” of the Standard Specifications for Public Works Construction (Greenbook) and the City of Los Angeles Department of Public Works Additions and Amendments to the Standard Specifications for Public Works Construction (Brownbook) that are applicable to City projects, if, during construction activities,

an unexpected discovery is made of items of archaeological or paleontological interest, excavation in the area of discovery shall immediately cease and shall not continue until ordered by the City Engineer.

The City Engineer shall follow the following procedures: In the event that any prehistoric or historic subsurface cultural resources are discovered during ground disturbing activities associated with implementation of the proposed Project, all work shall be halted and the project sponsor and/or lead agency shall consult with a qualified archaeologist to assess the significance of the find according to the CEQA definition of a historical or unique archaeological resource. If any archaeological materials are encountered during the course of project development, all further development activity shall halt and

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University (CSU) Fullerton, or a member of the Society of Professional Archaeologists (SOPA), or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact.
- The archaeologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

  South Central Coastal Information Center
  Department of Anthropology
  McCarthy Hall 477
  CSU Fullerton
  800 North State College Boulevard
  Fullerton, CA 92834

- Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

Implementation of RC-CR-1(a) would ensure potential impacts to buried archaeological resources would be less than significant.

The 2013 FEIR analysis of archaeological impacts did not expressly incorporate the above analysis, in particular references to Site P-19-003685. However, as shown above, the proposed Project would incorporate the 2013 FEIR mitigation measure as a regulatory compliance measure and result in less than significant impacts and would not result in a different impact conclusion from the 2013 FEIR.

c) No Impact. The proposed Project involves excavation to approximately 20 feet below ground surface. As described in the 2013 FEIR, no prehistoric or archeological resources have been identified within the proposed Project boundaries. However, there is the potential for discovery of previously unknown resources that if found, could result in significant impacts. Implementation of MM Cultural Resources 1(a) which requires that all work stop in the event of a prehistoric or archeological resource during ground disturbing activities as Regulatory Compliance Measure RC-ER-3 as a standard condition that

is required by City specifications to apply to the proposed Project would ensure impacts would be less than significant.

RC-ER-3: Pursuant to Section 6-3.2, “Archaeological and Paleontological Discoveries” of the Standard Specifications for Public Works Construction (Greenbook) and the City of Los Angeles Department of Public Works Additions and Amendments to the Standard Specifications for Public Works Construction (Brownbook) that are applicable to City projects, if, during construction activities, an unexpected discovery is made of items of archaeological or paleontological interest, excavation in the area of discovery shall immediately cease and shall not continue until ordered by the City Engineer.

The City Engineer shall follow the following procedures: If any paleontological materials are encountered during the course of project development, all further development activities shall halt and

- The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology — the University of Southern California, University of California at Los Angeles, CSU Los Angeles, CSU Long Beach, or the Los Angeles County Natural History Museum.
- The paleontologist shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact.
- The paleontologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report.
- Project development activities may resume once copies of the paleontological survey, study, or report are submitted to the Los Angeles County Natural History Museum.

Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.

A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

The 2013 FEIR is consistent with the above analysis, including the implementation of the 2013 FEIR’s mitigation measure as a regulatory compliance measure in the proposed Project and the conclusion that there would be less than significant impacts on paleontological resources. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

d) **No Impact.** There are no known cemeteries or human remains within the proposed Project area. However, there is a possibility that unknown, buried human remains may exist within the proposed Project area. To ensure potential impacts to unknown buried human remains, MM Cultural Resources 1(b), as provided in 2013 FEIR shall be implemented as Regulatory Compliance Measure RC-CR-1(b) as a standard condition that is required by law to apply to the proposed Project:

RC-CR-1(b): Pursuant to California Health and Safety Code, Section 7050.5 and California Public Resources Code, Section 5097.9, in the event that human skeletal remains are uncovered in the proposed Project area during construction or earth moving activities, all work shall immediately halt and the Los Angeles Coroner shall be contacted to evaluate the remains, by following the procedures and protocols pursuant to Section 15064.5 (e)(1) of the CEQA Guidelines.

Implementation of RC-CR-1(b) would ensure potential impacts to buried human remains would be less than significant.

The 2013 FEIR is consistent with the above analysis, including the implementation of the 2013 FEIR's mitigation measure as a regulatory compliance measure in the proposed Project and the conclusion that there would be less than significant impacts on human remains. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

V. Energy

Issues (and Supporting Information Sources):	Impact relative to the certified 2013 FEIR determinations: Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
6. Energy— Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Setting

According to the California Energy Commission (CEC), transportation accounts for nearly 37 percent of California's total energy consumption (CEC 2015). California consumed a total of 80,487 thousand barrels (3.4 billion gallons) of diesel fuel and 342,523 thousand barrels (14.4 billion gallons) of gasoline for transportation. Transportation fuels would be provided by local or regional suppliers, vendors, and patrons.

Discussion

a) **Less than Significant Impact.** Project activities will consume fuel through the operation of equipment and wheeled vehicles during construction that will use gasoline and diesel fuel. Table 11 below summarizes the anticipated fuel use for road vehicles and construction equipment.

Table 11. Estimated Fuel Use for Construction Activities

Source	Fuel Used (gallons)
Diesel	
Construction Worker Vehicles	64
Construction Vehicles	53,383
Construction Equipment	416,410
TOTAL	**469,867**
Gasoline	
Construction Worker Vehicles	27,070
TOTAL	**27,070**

Details of the potential fuel use calculations are provided in Appendix F.

Workers would be encouraged to carpool or use public transportation to the proposed Project site to the extent feasible. However, because workers are expected to be derived from the local area, worker fuel consumption would not be expected to be wasteful or inefficient, and workers would not be traveling a longer distance to the job site compared with other construction locations in the region.

Energy Conservation

During construction, equipment would be in compliance with CARB's Airborne Toxic Control Measure to limit heavy-duty diesel vehicles which prohibits diesel vehicles greater than 10,000 pounds from idling longer than five minutes. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3,

Chapter 1, Section 2025, subsection (h)) to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.15 In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower.

Operation

Electricity Demand

The Los Angeles Department of Water and Power (LADWP) would provide electricity to the CWC. Currently, LADWP generates approximately 7,880 megawatts (MW) of electricity for its service territory. Peak demand for electricity is expected to reach 5,933 MW by 2023 when the CWC is expected to be occupied. LADWP does not expect demand to exceed its ability to produce electricity within its territory. Therefore, there is adequate supply capacity to serve the CWC, as it is projected that approximately 3,426,170 kWh/yr of electricity would be used per year at the Project Site (see Table 10). Because the occupancy of the CWC will be primarily existing staff, demand for electricity is not expected to exceed current demand. Operation of the CWC will not require additional electricity compared with current demand. The proposed Project will be designed in compliance with California Code of Regulations Title 24 (CalGreen) which requires energy efficiency standards. The CWC will be designed to meet Leadership in Energy and Environmental Design (LEED) Gold standards for energy efficiency and will be in compliance with the City's Green Building Code. Because the proposed Project will be designed using current energy efficiency standards and will meet energy efficiency regulations, operation of the proposed Project would not result in wasteful or unnecessary consumption of electricity and impacts would be less than significant.

Natural Gas Demand

As shown in Table 12, the proposed Project would consume approximately 1,254,821 cubic feet of natural gas per year. Natural gas is provided to the Project Site by Southern California Gas Company (SoCalGas). Gas supply available to SoCalGas from California sources averaged 323 million cubic feet per day (cf/day) in 2017. Interstate pipeline delivery capability into SoCalGas on any given day is theoretically approximately 6,665 million cubic feet/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SoCalGas's estimated physical capacity of upstream pipelines. SoCalGas's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cubic feet, of that, 112.5 billion cubic feet is allocated to residential, small industrial, and commercial customers.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of pproviding service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., distribution lines) that would cause significant environmental impacts. As such, a less than significant impact to natural gas infrastructure would occur.

Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in

compliance with the City's Green Building Code, which requires building energy efficiency measures. Therefore, Project impacts related to natural gas supply would be less than significant.

Diesel Fuel Demand

As shown in Table 12, the proposed Project would consume approximately 193 gallons of diesel fuel per year when the standby generator is operated for testing and maintenance activities. Additional diesel fuel would be used for emergency purposes but would not exceed 500 gallons per event (due to its tank size). Approximately 4.2 billion gallons of diesel were sold in 2015 in California. Thus, project-related diesel fuel use would require a negligible fraction of the total state's diesel fuel consumption. Therefore, Project impacts related to diesel fuel demand would be less than significant.

Table 12. Estimated Electricity and Fuel Demand for Operations

Source	Value
Electricity[1]	3,426,170 kWh/yr
Natural Gas[2]	1,254,821 cf/yr
Diesel Fuel[3]	193 gallons/yr

[1] Calculated via CalEEMod
[2] Calculated via CalEEMod. CalEEMod reports natural gas consumption in 1,000 British thermal units (kBTU). SoCalGas Reports natural gas consumption in cubic feet (cf). For comparison purposes, the proposed Project's natural gas consumption from the CalEEMod results has been converted into cf. One kBTU equals approximately 0.98 cf.
[3] Calculated via CalEEMod's CH_4 emissions for the standby generator and based on 0.0014 kg CH_4/gallon diesel (California Climate Action Registry General Reporting Protocol)

The 2013 FEIR analysis of energy resources did not expressly incorporate the above analysis. However, as shown above, the proposed Project would result in less than significant impacts and would not result in a different impact conclusion from the 2013 FEIR.

b) **Less than Significant Impact**. Several energy conservation policies and regulations pertain to the proposed Project.

- CCR Title 24 California Green Building Standards (CalGreen)
- City of Los Angeles Green Building Code
- CARB Rules

Construction and operation of the proposed Project would comply with these policies and regulations as described above and in Section II Air Quality and Section VIII Greenhouse Gases. In addition, the proposed Project will be designed to meet LEED Gold energy efficiency standards for electricity, City of Los Angeles Green Building code, and CalGreen standards. By complying with these standards, the proposed Project would not conflict with or obstruct state or local plans for renewable energy or energy efficiency.

The 2013 FEIR analysis of renewable energy and energy efficiency did not expressly incorporate the above analysis. However, as shown above, the proposed Project would result in less than significant impacts and would not result in a different impact conclusion from the 2013 FEIR.

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VI. Geology and Soils

Issues (and Supporting Information Sources):	Impact relative to the certified 2013 FEIR determinations: Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS— Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?: (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Setting

The proposed Project site is located within the Los Angeles basin which at the point where the Traverse Range and Peninsular Range meet. The proposed Project area is generally underlain by Quaternary alluvial soils overlying Tertiary age sedimentary deposits. The alluvium is generally comprised of both stream channel and floodplain deposits of the Los Angeles River consisting of unconsolidated silt, sand, and gravel. Older alluvium consisting of river terrace deposits is mapped along the east side of the river. These deposits are described as dissected silt, sand, and gravel. As with the majority of Southern California, the proposed Project area is located in a seismically active area. The numerous faults in Southern California include active, potentially active, and inactive faults. As defined by the California Geological Survey, active faults are faults that have ruptured within Holocene time, or within approximately the last 11,000 years. Potentially active faults are those that show evidence of movement during Quaternary time (approximately the last 1.6 million years), but for which evidence of Holocene movement has not been established. Inactive faults have not ruptured in the last approximately 1.6 million years. The

proposed Project site is not located within a State of California Earthquake Fault Zone (formerly known as Alquist-Priolo Special Studies Zone). In addition, the proposed Project site is not located within a fault

rupture study area as indicated in Exhibit A of the City of Los Angeles Safety Element (1996). Based on review of pertinent readily available geologic literature, geologic maps, and stereoscopic aerial photographs, a concealed trace of the active Upper Elysian Park Blind Thrust Fault is mapped as crossing the northern portion of the proposed Project area. In addition, other active faults within approximately 25 miles of the proposed Project area include the Puente Hills Blind Thrust, Hollywood, Newport-Inglewood, Whittier, and Palos Verdes faults. At the proposed Project site, depth to groundwater is approximately 25 feet below ground surface. The proposed Project area is located in an area that potentially subjected to liquefaction according to the California Seismic Hazards Zone Map.

A subsurface evaluation was conducted between January 9 and January 17, 2017, to evaluate soil and geologic conditions at the site and prepare geotechnical recommendations for the design and construction of the proposed structures and improvements. Field activities included drilling, logging, and sampling of eight borings and four Cone Penetrometer Testing (CPT) borings. The borings were drilled to depths ranging from approximately 38.1 to 104.1 feet bgs.

Discussion

a, i-iii.) Less than Significant. The proposed Project could be subject to seismic groundshaking in the event of an earthquake. The strength and duration of seismic groundshaking would depend on the location of the earthquake and the distance from the CWC. As analyzed in the 2013 FEIR, the proposed Project site is not located within a State of California Earthquake Fault Zone (formerly known as Alquist-Priolo Special Studies Zone). In addition, the proposed Project site is not located within a fault rupture study area as indicated in Exhibit A of the City of Los Angeles Safety Element (1996) and there would be no impacts related to rupture of a known earthquake fault. However, based on additional review, other faults may be within or near the project area.

Because of the location of active faults within proximity of the CWC, impacts related to strong seismic groundshaking could be significant relative to being caused directly or indirectly by project activities such as excavation and other subsurface activity. With the implementation of mitigation measures MM Earth Resources 1 from the 2013 FEIR that requires future developments to comply with all local and state standards regarding seismic safety in design as Regulatory Compliance Measure RC-ER-1 as a standard condition that is required by law to apply to the proposed Project, impacts related to strong seismic shaking would be ensured to be less than significant.

RC-ER-1: Prior to allowing any future development in the proposed Project area, all applicable state and local standards with respect to seismic safety shall be complied with. The design and construction of the proposed Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

The 2013 FEIR analysis of seismic impacts did not expressly incorporate the above analysis. However, as shown above, the proposed Project, including the implementation of the 2013 FEIR mitigation measure as a regulatory compliance measure, would result in less than significant impacts, and would not result in a different impact conclusion from the 2013 FEIR.

a, iv) No Impact. The proposed Project is located in an area that is relatively flat, there are steeper slopes located to the west and northwest of the proposed Project site. According to the 2013 FEIR, there are no mapped landslides within the proposed Project area and the only mapped landslide areas are

to the west of the proposed Project site at Elysian Park. The proposed Project will not introduce or structurally alter infrastructure in areas prone to landslide.

b) No Impact. The proposed Project is located in an area that is developed or paved. The existing LASAN parcel that is used for a material storage yard is not paved. During construction, the proposed Project will be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and waterborne erosion at the site. The proposed Project applicant would be required to prepare and implement a site-specific Stormwater Pollution Prevention Plan (SWPPP), in accordance with the State Water Resources Control Board's General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.)

Construction of the proposed Project will be required to comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized.

Through compliance with these existing regulations and conditions of approval, impacts associated with construction of the CWC would be less than significant.

The 2013 FEIR analysis of erosion impacts did not expressly incorporate the above analysis. However, as shown above, the proposed Project, compliance with regulatory compliance measures and standard conditions of approval, would result in less than significant impacts, and would not result in a different impact conclusion from the 2013 FEIR.

c) No Impact. As identified in the 2013 FEIR, the proposed Project is located in an area mapped as potentially liquefiable on the State of California Seismic Hazards Zones map (City of Los Angeles 2011). Implementation of **MM Earth Resources 2** from the 2013 FEIR, which requires geotechnical evaluations prior to the construction of projects will be implemented prior to the construction of the proposed Project as Regulatory Compliance Measure RC-ER-2 as a standard condition that is required by law to apply to the proposed Project and would ensure impacts associated with liquefaction would be less than significant.

RC-ER-2: Prior to the issuance of grading or building permits in the portions of the Project area that are subject to liquefaction, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The project shall comply with the Uniform Building Code Chapter 18, Division 1, Section 1804.5 Liquefaction Potential and Soil Strength Loss. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement, or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures.

The Project shall also comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, as it may be subsequently amended or modified. With the implementation of MM Earth Resources 2, impacts related to unstable soils or soils that would become unstable would be less than significant.

The proposed Project is located in an area that is relatively flat, there are steeper slopes located to the west and northwest of the proposed Project site. According to the 2013 FEIR, there are no mapped landslides within the proposed Project area and the only mapped landslide areas are to the west of the proposed Project site at Elysian Park.

The 2013 FEIR is consistent with the above analysis, including the implementation of the 2013 FEIR's mitigation measure as a regulatory compliance measure in the proposed Project and the conclusion that there would be less than significant impacts due to liquefaction. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

d) No Impact. Soils within the proposed Project site are not soils classified as soils that have high expansion potential and consist primarily of silts, sands, and gravels (Ninyo and Moore 2017). Because of the development history at the site, little of the native soil exists.

The 2013 FEIR is consistent with the above analysis, including the implementation of the 2013 FEIR's mitigation measure as a regulatory compliance measure in the proposed Project and the conclusion that there would be less than significant impacts due to expansive soils as defined by the Uniform Building Code. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis

e) No Impact. The proposed Project will not include the installation of septic tanks or alternative wastewater disposal systems.

VIII. Greenhouse Gas Emissions

		Impact relative to the certified 2013 FEIR determinations			
Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
8.	**Greenhouse Gases—Would the project:**				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Setting

GHGs are compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. Regulated GHGs include CO_2, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. GHGs are commonly quantified in the equivalent mass of CO_2, denoted CO_2e, which takes into account the global warming potential of each individual GHG compound. Based on 2009 GHG inventory data prepared by the CARB, California emitted 453 million metric tons (MMT) of CO_2e, including emissions resulting from imported electrical power, in 2009 and 405 MMT CO_2e excluding emissions related to imported electrical power.

According to the CARB, the potential impacts in California due to global climate change may include loss in snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, more drought years, increased erosion of California's coastlines, sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems, and increased pest infestation.

In September 2006, the Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, was signed into law. AB 32 requires that the state reduce its GHG emissions to 1990 levels by 2020. The CARB established the 1990 target at 427 MMT CO_2e. Under AB 32, the CARB has primary responsibility for promulgating regulations, programs, and enforcement mechanisms to achieve the GHG reduction target.

Senate Bill (SB) 32, signed September 8, 2016, updates AB 32 (the Global Warming Solutions Act) to include an emissions reductions goal for the year 2030. Specifically, SB 32 requires the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. The new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

In 2008, CARB approved the original *Climate Change Scoping Plan* as required by AB 32. Subsequently, CARB approved updates to the *Climate Change Scoping Plan* in 2014 *(First Update)* and 2017 *(2017 Update)*, with the *2017 Update* considering SB 32 (adopted in 2016) in addition to AB 32.

The California Renewables Portfolio Standard (RPS) program (2002, SB 1078) required that 20 percent of the available energy supplies are from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20 percent mandate to 2010. These mandates apply directly to investor-owned utilities. On April 12, 2011, California Governor Jerry Brown signed into law SB 2X, which modified California's RPS program to require

that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California SB 2X also requires regulated sellers of electricity to meet an

interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016. These levels of reduction are consistent with the LADWP commitment to achieve 35 percent renewables by 2020.

In 2017, LADWP indicated that 29 percent of its electricity came from renewable resources in Year 2016. Therefore, under SB 2X, LADWP is required to increase its electricity from renewable resources by an additional 4 percent to comply with the RPS of 33 percent.

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by December 31, 2030; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

SB 1368, signed September 29, 2006, is a companion bill to AB 32 that requires the California Public Utilities Commission (CPUC) and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the state. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32. On January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard, which is a facility-based emissions standard requiring that all new long-term commitments for baseload generation to serve California consumers be with power plants that have GHG emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of CO_2 per megawatt hour (MWh). Furthermore, on May 23, 2007, the CEC adopted regulations that establish and implement an identical Emissions Performance Standard of 1,100 pounds of CO_2 per MWh (see CEC Order No. 07-523-7).

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2017. Most mandatory measure changes in the 2016 CALGreen Code from the previous 2013 CALGreen Code were related to the definitions and to the clarification or addition of referenced manuals, handbooks, and standards. For example, several definitions related to energy that were added or revised affect electric vehicles chargers and charging and hot water recirculation systems. For new multi-family dwelling units, the residential mandatory measures were revised to provide additional electric vehicle charging space requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification. For nonresidential mandatory measures, the table (Table 5.106.5.3.3) identifying the number of required EV charging spaces has been revised in its entirety. Compliance with Title 24 is enforced through the building permit process. The 2019 CalGreen code updates were published July 1, 2019, with an effective date of January 1, 2020.

On June 19, 2008, the Office of Planning and Research (OPR) released a technical advisory on addressing climate change. This guidance document outlines suggested components to CEQA disclosure, including quantification of GHG emissions from a project's construction and operation; determination of significance of the project's impact to climate change; and if the project is found to be significant, the identification of suitable alternatives and mitigation measures.

SB 97, passed in August 2007, is designed to work in conjunction with CEQA and AB 32. SB 97 requires OPR to prepare and develop guidelines for the mitigation of GHG emissions or the effects thereof, including, but not limited to, the effects associated with transportation and energy consumption. The Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted on December 30, 2009 and address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the Guidelines Amendments. The Guidelines Amendments require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of

GHG emissions resulting from a project. The Guidelines Amendments give discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance- based standards. Furthermore, the Guidelines Amendments identify the following three factors that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies “that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA’s requirements for cumulative impact analysis.”

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any EIR, negative declaration, mitigated negative declaration, or other document required by CEQA, which has not been finalized.

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) on April 7, 2016. The 2016–2040 RTP/SCS reaffirms the land use policies that were incorporated into the 2012–2035 RTP/SCS. These foundational policies, which guided the development of the 2016–2040 RTP/SCS’s strategies for land use, include the following:

- Identify regional strategic areas for infill and investment;
- Structure the plan on a three-tiered system of centers development;
- Develop “Complete Communities”;
- Develop nodes on a corridor;
- Plan for additional housing and jobs near transit;
- Plan for changing demand in types of housing;
- Continue to protect stable, existing single-family areas;
- Ensure adequate access to open space and preservation of habitat; and
- Incorporate local input and feedback on future growth.

The 2016–2040 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the 2016–2040 RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The 2016–2040

RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

The City began addressing the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan) in 2007. This document outlines the goals and actions the City has established to reduce the generation and emission of GHG emissions from both public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels by year 2030. To achieve this, the City has been implementing the following:

- Increase the generation of renewable energy.
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

On December 15, 2011, the Los Angeles City Council approved Ordinance No. 181,481, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2010 CALGreen Code. On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which further amended Chapter IX of the LAMC, by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CALGreen Code. Projects filing building permit applications on or after January 1, 2020, must comply with the provisions of the current Los Angeles Green Building Code.

The Sustainable City pLAn was adopted in 2015 and updated in 2019 as the New Green Deal pLAn includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Specific targets include ensuring that 57 percent of new housing units will be constructed within 1,500 feet of transit by 2025 and 75 percent by 2035, reducing vehicle miles traveled per capita by 5 percent by 2025, and moving toward 100 percent zero emissions vehicles by 2050.

Discussion

(a-b) Less Than Significant Impact. Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Section 15064.4 recommends that lead agencies quantify the GHG emissions of projects and consider several other factors that may be used in the determination of significance of project-related GHG emissions, including the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHG emissions.

Section 15064.4 does not establish a threshold of significance. Lead agencies are given discretion to utilize significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the

California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (refer to CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis, as required by CEQA Guidelines Section 15130(f). As a note, the CEQA Guidelines were amended in response to SB 97 to specify that

compliance with a GHG emissions reduction plan renders a project's incremental contribution not cumulatively considerable (See CEQA Guidelines Section 15064.4(b)(3).

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significance for GHG emissions if a project complies with regulatory programs to reduce GHG emissions.

In the absence of any adopted numeric threshold, the significance of the proposed Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the proposed Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For the proposed Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2016–2040 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements outlined in the Climate Change Scoping Plan, the Green LA/ClimateLA Program, the Green New Deal pLAn, and the L.A. Green Building Code.

Consistency with Applicable Plans and Policies

Statewide: Climate Change Scoping Plan

A discussion of the proposed Project's consistency with the actions and strategies of the Climate Change Scoping Plan is included on Table 13. As discussed there, the proposed Project would be consistent with the Climate Change Scoping Plan.

Regional: 2016–2040 RTP/SCS

The 2016–2040 RTP/SCS is expected to help California reach its GHG emissions reduction goals, with reductions in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035. Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040. The 2016–2040 RTP/SCS would result in an estimated 8 percent decrease in per capita passenger vehicle GHG emissions by 2020, 18 percent decrease in per capita passenger vehicle GHG emissions by 2035, and 21 percent decrease in per capita passenger vehicle GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and

2035, as well as achieving an approximately 21 percent decrease in per capita passenger vehicle GHG emissions by 2040 (an additional 3 percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals.

The proposed Project is an infill development that would be within 0.5 mile of a well-serviced transit stop or a transit corridor with 15 minute or less service frequency during peak commute hours. Given the proposed Project location, the proposed Project would provide employees and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled (VMT) and related vehicular GHG emissions. These proposed Project features would be consistent with the goals of SCAG's 2016–2040 RTP/SCS.

Table 12. Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030. Required measures include: • Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. • Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.	CPUC, CEC, CARB	**Consistent.** As LADWP would provide electricity service to the proposed Project site, by 2030 the proposed Project would use electricity consistent with the requirements of SB 350. It is assumed that LADWP will receive at least 33 percent of electricity from renewable sources by year 2020 and 50 percent by 2030 (with a straight-line interpolation for the Project buildout year of 2024). The proposed Project would comply with CalGreen and Title 24 energy efficiency standards.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Implement Mobile Source Strategy (Cleaner Technology and Fuels) • At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. Medium- and heavy-duty GHG Phase 2. • Innovative Clean Transit: Transition to a suite of to-be- determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOx standard. • Last Mile Delivery: New regulation that would result in the use of low NOx or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.	CARB, CalSTA, SGC, CalTrans CEC, OPR, Local agencies	**Consistent.** GHG emissions generated by Project-related vehicular travel would benefit from proposed regulation, and mobile source emissions generated by the proposed Project would be reduced with implementation of standards under the Advanced Clean Cars Program, consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions estimates conservatively do not include this additional 34 percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the proposed Project would also benefit from these measures once adopted. With regard to SB 375, the proposed Project represents an infill development within an existing urbanized area. Therefore, the proposed Project would be consistent with SCAG's 2016– 2040 RTP/SCS. Furthermore, the RTP/SCS would result in an estimated 18 percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21 percent decrease in per capita GHG emissions from passenger vehicles by 2040. Project-related transportation emissions would be reduced by approximately 36 percent and therefore, the Project would be consistent with SB 375 and the 2016–2040 RTP/SCS.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
• Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743;and potential additional VMT reduction strategies not specified in the MobileSource Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)	CARB	**Consistent** The proposed Project would be consistent with SB 375 for developing an infill project within an existing urbanized area. Project-related transportation emissions would be reduced by approximately 36 percent and therefore, the proposed Project would be consistent with SB 375 and the 2016–2040 RTP/SCS.
By 2019, adjust performance measures used to select and design transportation facilities. • Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection).	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	**Not Applicable.** The proposed Project would not involve construction of transportation facilities. However, the proposed Project would be located in close proximity to ample transit opportunities.
By 2019, develop pricing policies to support low- GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	**Consistent.** The proposed Project would support this policy because the Project Applicant would be required by the City to provide electric vehicle supply wiring (EV-ready) would be available in at least 20 percent of the total code-required parking spaces for the proposed Project.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Implement California Sustainable Freight Action Plan: • Improve freight system efficiency. • Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	CARB	**Not Applicable.** The proposed Project land uses would not include freight transportation or warehousing. Therefore, the proposed Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.
Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.	CARB	**Consistent.** This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors. The current LCFS, adopted in 2007, requires a reduction of at least 10 percent in the carbon intensity (CI) of California's transportation fuels by 2020. On September 27, 2018, CARB amended the LCFS regulation to target a 20 percent reduction in CI from a 2010 baseline by 2030.
Implement the Short-Lived Climate Pollutant Strategy by 2030: • 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**Consistent.** The Project would comply with the CARB Short-Lived Climate Pollutant (SLCP) Reduction Strategy, which limits the use of hydrofluorocarbons for refrigeration uses.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**Not Applicable.** This strategy calls on regulators to reduce GHG emissions from landfills and is not applicable to a development project. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75 percent reduction by 2025.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Not Applicable.** This applies to state regulators and is not applicable to a development project. The current Cap-and-Trade program would end on December 31, 2020. Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink: • Protect land from conversion through conservation easements and other incentives. • Increase long-term resilience of carbon storage in the land base and enhance sequestration capacity. • Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments. • Establish scenario projections to serve as the foundation for the Implementation Plan.	CNRA and departments within, CDFA, CalEPA, CARB	**Not Applicable.** This applies to state regulators and is not applicable to a development project. This regulatory program applies to Natural and Working Lands, not directly related to development of the proposed Project. However, the proposed Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	**Not Applicable.** This applies to state regulators and is not applicable to a development project**.** This regulatory program applies to Natural and Working Lands, not directly related to development of the proposed Project. However, the proposed Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Implement Forest Carbon Plan	CNRA, CAL FIRE, CalEPA and departments within	**Not Applicable.** This applies to state regulators and is not applicable to a development project**.** This regulatory program applies to state and federal forest land, not directly related to development of the proposed Project. However, the proposed Project would not interfere or impede implementation of the Forest Carbon Plan.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not Applicable.** This applies to state regulators and is not applicable to a development project**.** Funding and financing mechanisms are the responsibility of the state and local agencies. The proposed Project would not conflict with funding and financing mechanisms to support GHG reductions.

At the regional level, the 2016–2040 RTP/SCS is an applicable plan adopted for the purpose of reducing GHG emissions. In order to assess the proposed Project's potential to conflict with the 2016–2040 RTP/SCS, this section also analyzes the proposed Project's land use assumptions for consistency with those utilized by SCAG in its Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's 2016-2040 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As demonstrated earlier, the proposed Project would be consistent with the 2016–2040 RTP/SCS.

As illustrated on Table 14, the proposed Project is the type of land use development that is encouraged by the 2016-2040 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state's long-term climate policies. By furthering implementation of SB 375, the proposed Project supports regional land use and transportation GHG emissions reductions consistent with state regulatory requirements.

Therefore, the proposed Project would be consistent with the 2016–2040 RTP/SCS and the GHG reduction-related actions and strategies contained therein.

Table 14. Consistency with the 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels	Local jurisdictions	**Not Applicable.** The proposed Project does not include any residences, would not remove housing units from the region, and would not inhibit the pursuit of this goal.
Focus new growth around transit	Local Jurisdictions	**Consistent.** The proposed Project is an infill development that would be consistent with the 2016-2040 RTP/SCS's focus on placing growth near transit facilities.
Plan for growth around livable corridors, including growth on the Livable Corridors	SCAG, Local Jurisdictions	**Consistent.** The proposed Project is an infill development that would be consistent with the 2016 RTP/SCS focus on focusing growth along the 2,980 miles of Livable Corridors in the region.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities	SCAG, Local Jurisdictions	**Consistent.** The proposed Project would help further jobs/housing balance objectives that could allow for short trips. The proposed Project is also generally consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas, because the Project would improve an existing hospitality use along Ventura Boulevard.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans	Local Jurisdictions	**Not Applicable.** While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the proposed Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies	SCAG, Local Jurisdictions	**Consistent.** The proposed Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
Transportation Strategies		
Preserve our existing transportation system	SCAG, County Transportation Commissions, Local Jurisdictions	**Not Applicable.** While this strategy calls on investing in the maintenance of our existing transportation system, the Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies	County Transportation Commissions, Local Jurisdictions	**Consistent.** The proposed Project is an infill development that would minimize congestion impacts on the region because of the proposed Project site's proximity to public transit, Complete Communities, and general density of population and jobs.
Promote safety and security in the transportation system	SCAG, County Transportation Commissions, Local Jurisdictions	**Not Applicable.** While this strategy aims to improve the safety of the transportation system and protect users from security threats, the proposed Project would not interfere with such policymaking.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems	SCAG, County Transportation Commissions, Local Jurisdictions	**Not Applicable.** This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The proposed Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emission vehicles	SCAG, Local Jurisdictions	**Not Applicable.** This action/strategy is not necessarily applicable on a project-specific basis. However, the proposed Project would not inhibit the pursuit of zero-emission vehicle objectives.
Promote neighborhood electric vehicles	SCAG, Local Jurisdictions	**Consistent.** This action/strategy is not necessarily applicable on a project-specific basis. However, the proposed Project would comply with the LAMC requirements to provide EV parking.
Implement shared mobility programs	SCAG, Local Jurisdictions	**Not Applicable.** While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the proposed Project would not interfere with these emerging programs.
Source: Southern California Association of Governments; *2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth*; April 2016.		

Local: LA Green Plan/Climate LA Plan

The LA Green Plan outlines the goals and actions the City has established to reduce the generation and emission of GHG emissions from both public and private activities. Table 15 includes a discussion of the proposed Project's consistency with applicable GHG-emissions-reducing actions from the LA Green Plan. As discussed below, the proposed Project is consistent with the applicable goals and actions of the LA Green Plan. To facilitate implementation of the LA Green Plan, the City adopted the Los Angeles Green Building Code. The 2016 Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code, as amended pursuant to City Ordinance No. 184,692), incorporated by reference the mandatory requirements of the 2016 California Green Building Standards Code (discussed above under AB 32 Climate Change Scoping Plan).

Table 15. Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	Consistency Analysis
Focus Area: Energy			
E6	Present a comprehensive set of green building policies to guide and support private sector development.	The City initiated an effort to establish green building requirements, paired with incentives, for medium- to large-private projects. Buildings account for a majority of electricity use. Each building site relates to a wide range of environmental issues faced by the City, so addressing each site in a comprehensive manner will provide a variety of environmental benefits.	**Consistent.** While this action primarily applies to the City, the proposed Project would be designed and operated to meet the applicable requirements of the State Green Building Standards Code and the City's Green Building Code.
W1	Meet all additional demand for water resulting from growth through water conservation and recycling.	The Mayor's Office and LADWP developed the *Securing LA's Water Supply* plan, which is an aggressive, multi-faceted approach to developing a locally sustainable water supply. The plan includes a set of key short-term and long-term strategies to secure our water future, such as: Short-Term Conservation Strategies: • Enforcing prohibited uses of water (levying fines and sanctions against water abusers and increase water conservation awareness). • Expanding the list of prohibited uses of water (possible further restrictions on watering landscape and washing/rinsing vehicles without a self-closing nozzle). • Extending outreach efforts, water conservation incentives, and rebates. • Encouraging regional conservation measures (encourage all water agencies in the region to	**Consistent.** While this action primarily applies to the City and LADWP, the proposed Project would incorporate water conservation features in accordance with the City's Green Building Code. Water conservation measures could include: Energy Star-certified appliances, use of ultra-low-flow toilets and hand wash faucets in public facilities.

		adopt water conservation ordinances which include prohibited uses and enforcement). Long-Term Conservation Strategies: • Increasing water conservation through reduction of outdoor water use and new technology. • Maximizing water recycling. • Enhancing stormwater capture. • Accelerating cleanup of the groundwater basin. • Expanding groundwater storage.	
W2	Reduce per capita water consumption by 20percent	[See W1, above.]	**Consistent.** The proposed Project would incorporate water conservation features in accordance with the City's Green Building Code. Water conservation measures could include: Energy Star-certified appliances, use of ultra-low-flow toilets and hand wash faucets in public facilities.
Focus Area: Transportation			
T4	Complete the Automated Traffic Surveillance and Control System (ATSAC).	This action reduces vehicle emissions that result from idling at intersections. By reducing vehicle stops, delays and travel time through improved traffic signal timing, vehicles can travel a longer distance at a consistent rate of speed, improving fuel economy.	**Consistent.** While the City has implemented this action, the proposed Project would not interfere with the advancement of more signal timing in the City.
T6	Make transit information easily	A Los Angeles Department of Transportation (LADOT)	**Consistent.** While this action primarily applies

	available, understandable, and translated into multiple languages	partnership with the Personnel Department will enable LADOT to determine in which additional languages transit information should be provided. Facilitating access to transit information increases the likelihood of transit use, which can reduce single occupancy vehicle trips and help alleviate traffic congestion, and most importantly, reducing associated GHG emissions.	to the City, the proposed Project would not impair the ability of the City to make transit information easily available, understandable, and translated into multiple languages.
T8	Promote walking and biking to work, within neighborhoods, and to large events and venues.	Promoting alternate modes of travel will reduce the carbon emissions associated with single occupancy vehicles. As described in Action Items LU1 and LU2 below, the City is promoting high-density and mixed-use housing close to major transportation arteries. Such developments will also support the advancement of Action Item T8, by improving accessibility for those who wish to walk and bike to work.	**Consistent.** While this action primarily applies to the City, the proposed Project would not interfere with alternate modes of travel.
Focus Area: Land Use			
LU1	Promote high density housing close to major transportation arteries.	With 469 square miles, Los Angeles is a vast and sprawling city. Yet many neighborhoods are walkable, with stores and services clustered near dense residential housing. As the city continues to redevelop and grow, there is an unprecedented opportunity to rethink the urban environment. Accommodating continued growth requires taking advantage of infill opportunities and increasing density along transit corridors.	**Not Applicable.** The proposed Project does not include development of housing.
LU2	Promote and implement transit-oriented development (TOD).	TODs represent opportunities for creating cohesive, vibrant, walkable communities where fragmented, auto- dependent corridors now exist. TODs are a	**Consistent.** While the City has implemented this action, the proposed Project would

		positive alternative to low-density traditional land use patterns that typically segregate housing, jobs and neighborhood services from one another. In contrast, TODs cluster these community elements in close proximity, so a greater portion of trips can be made by transit, bike, or on foot.	not interfere with the development of TODs.
Focus Area: Waste			
WsT1	Reduce or recycle 70 percent of trash by 2015.	Source reduction and recycling programs not only conserve natural resources and landfill space, but also confer climate benefits.	**Consistent.** While this action primarily applies to the City, the Project would not interfere with reduction and recycling programs.

The proposed Project would comply with performance-based standards included in the Green Building Code. In order to meet reduction goals in the LA Green Plan, LADWP will continue to implement programs to emphasize water conservation and will pursue securing alternative supplies, including recycled water and storm water capture. The LADWP is required to procure a minimum of 33 percent of its energy portfolio from renewable sources by 2020 and would continue to implement programs consistent with the LA Green Plan. Therefore, the proposed Project would be consistent with the LA Green Plan.

Local: City of Los Angeles /Green New Deal pLAn

As discussed above, the Green New Deal pLAn includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. The Green New Deal pLAn provides information as to what the City will do with buildings and infrastructure in their control. Specific targets related to housing and development and mobility and transit include the decrease of VMT per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. The proposed Project would generally comply with these targets as the proposed Project is an infill development consisting of an office use on the proposed Project site, which is located near regional and local transit services. The proposed Project would be well-served by transit and in compliance with the LAMC, would implement a TDM Program that would encourage transit use. Furthermore, the proposed Project would comply with CALGreen, implement various energy and water conservation measures in accordance with the City's Green Building Code, and comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in Green New Deal pLAn with regard to energy-efficient buildings and waste and landfills. The proposed Project would also provide secure short- and long-term bicycle storage areas for proposed Project guests and employees. Therefore, the Project would be consistent with the updated Green New Deal pLAn.

Project Emissions

As described above, consistency with a GHG emissions reduction plan renders a project's impact less than significant. In support of the consistency analysis, an estimation of the proposed Project's GHG emissions is provided below.

The proposed Project would result in direct and indirect GHG emissions associated with the following sources:

- Construction: emissions associated with demolition and construction of buildings and parking structures;
- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Mobile source: emissions associated with vehicle trips generated by the proposed Project;
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

Construction Emissions

Proposed Project construction is anticipated to be completed in 2024 with occupancy the same year. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in Appendix B. The GHG emissions associated with construction of the proposed Project were calculated for each year of construction activity. A summary of GHG emissions for each year of construction is presented on Table 16.

As presented on Table 16 construction of the proposed Project is estimated to generate a total of 1,562 $MTCO_2e$. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the proposed Project (i.e., total construction GHG emissions were divided by 30 to determine annual construction emissions estimate that can be added to the proposed Project's operational emissions) in order to determine the proposed Project's annual GHG emissions inventory. This results in annual proposed Project construction emissions of 52 $MTCO_2e$. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix B to this document.

Table 136. Combined Construction-Related GHG Emissions

Year	$MTCO_2e$[1]
2023	740
2024	822
Total	**1562**
Amortized Over 30 Years	***52***
[1] CO_2e was calculated using CalEEMod and the results are provided in the Construction CalEEMod output file.	

Operational Emissions

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes hearths and landscape maintenance equipment. As shown on Table 17, the proposed Project would result in less than 1.0 $MTCO_2e$ per year from area sources.

Electricity and Natural Gas Generation Emissions

GHG emissions are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO_2 and other GHG emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Table 14. Annual GHG Emissions Summary (Buildout) (MTCO2e)

Year	$MTCO_2$[a]
Area	0.0271
Energy (electricity and natural gas)	1,147
Mobile	796
Stationary	1.91
Solid Waste	58
Water/Wastewater	166
Construction	52
Total Emissions	**2,221**
$MTCO_2e$ = metric tons of carbon dioxide equivalent	

Electricity and natural gas emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for LADWP were selected in CalEEMod. The carbon intensity (pounds per MWh) for electricity generation was calculated for the most recent year (2021) which is a 46 percent decrease from 2007. This value is conservative as the projected buildout year (2024) would reflect increased renewable energy targets of 44 percent by 2024.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in

appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., HVAC system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. As shown on Table 16, Project GHG emissions from electricity and natural gas usage would result in a total of 1,147 $MTCO_2e$ per year.

Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with employees and visitors, and delivery vehicles visiting the proposed Project site based on the number of daily trips generated and VMT. Mobile source operational GHG emissions were calculated using CalEEMod and are based on the proposed Project trip-generation estimates.

The proposed Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation related design techniques. These techniques would reduce vehicle trips and VMT associated with the proposed Project relative to the default generation rates, which would result in a comparable reduction in VMT and associated GHG emissions. Techniques applicable to the proposed Project include the following (a brief description of the proposed Project's relevance to the measure is also provided):

CAPCOA Measure LUT-1 – Increase Density: Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The proposed Project would increase the proposed Project site's job density by reusing a vacant lot and adding approximately 480 new jobs.

CAPCOA Measure LUT-3 – Increase Diversity of Urban and Suburban Developments (Mixed-Use): The proposed Project would introduce an office building, laboratory and Community Learning Center on the proposed Project site. The change in land use diversity and mix of uses on the proposed Project site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation (i.e., walking and biking), which would result in corresponding reductions in transportation-related emissions.

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the project (primary, diverted, and pass-by). As shown on Table 16, the proposed Project's GHG emissions from mobile sources would result in a total of 796 $MTCO_2e$ per year. This estimate reflects reductions attributable to the proposed Project's characteristics, as described above.

Stationary Emissions

Stationary source emissions from use of the emergency diesel generator were calculated using the CalEEMod emissions inventory model. As shown on Table 16, the proposed Project would result in 1.9 $MTCO_2e$ per year.

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod

solid waste generation rates for each applicable land use were selected for this analysis. As shown on Table 16, the proposed Project scenario is expected to result in a total of 58 $MTCO_2e$ per year from solid waste that accounts for a 50-percent recycling/diversion rate.

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include: (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water. GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2016 California Plumbing Code, 2016 CALGreen, 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code, and reflect an approximately 20 percent reduction as compared to the base demand.

As shown on Table 18, Project GHG emissions from water/wastewater usage would result in a total of 166 $MTCO_2e$ per year, which reflects a 20 percent reduction in water/wastewater emissions consistent with building code requirements as compared to the proposed Project without sustainability features related to water conservation.

Combined Construction and Operational Emissions

As shown on Table 18, when taking into consideration implementation of the requirements set forth in the City's Green Building Code and the full implementation of current state mandates, the GHG emissions for the proposed Project would equal 52 $MTCO_2e$ annually (as amortized over 30 years) during construction.

Estimated Reduction of Project Related GHG Emissions Resulting from Consistency with Plans

As noted earlier, one approach to demonstrating a project's consistency with GHG emissions reduction plans is to show how a project would reduce its incremental contribution when compared to a scenario in the absence of GHG emissions reduction plans. The analysis in this section includes potential emissions under such a scenario and from the proposed Project at build-out based on actions and mandates expected to be in force in 2024.

Table 18 shows the GHG emissions associated with the proposed Project in the absence of the GHG emissions reduction plans and policies discussed previously and the reductions in the proposed Project's GHG emissions as a result of the effectiveness of the previously discussed plans and policies. As shown, GHG emissions reduction plans and policies would reduce proposed Project emissions overall by 37 percent when compared to the proposed Project's development in the absence of such reduction plans and policies.

Given the proposed Project's consistency with state, regional, and City GHG emissions reduction plans and policies, the Project is consistent with all applicable plans, policies, and regulations adopted for the purpose of reduction GHG emissions. Therefore, the proposed Project's

incremental contribution to GHG emissions and their effects on climate change would not be considerable.

Table 158. Project Operational GHG Emissions ($MTCO_{2e}$)

Scenario and Source	Project Emissions in the Absence of GHG Emissions Reduction Plans and Policies	Project Emissions	Emissions Reduction	Percent Reduction
Area Sources	0.0271	0.0271	0	0%
Energy Sources	1980	1147	-833	-42%
Mobile Sources	1247	796	-450	-36%
Waste Sources	58	58	0	0%
Water Sources	166	166	0	0%
Construction[1]	52	52	0	0%
Total Emissions	3,503	2,219	-1,283	-37%

[1] Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

Cumulative Impacts

The analysis of the proposed Project's GHG emissions impacts above is a cumulative impact analysis. As concluded there, the proposed Project's contribution to GHG emissions impacts would not be cumulatively considerable.

The 2013 FEIR analysis of GHG impacts did not expressly incorporate the above analysis, as it was based on the then-applicable regulations and guidance at the time. However, as shown above, the proposed Project would result in less than significant impacts under the currently applicable regulations and guidance regarding GHG and would not result in a different impact conclusion from the 2013 FEIR.

IX. Hazards and Hazardous Materials

		Impact relative to the certified 2013 FEIR determinations			
Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
9.	**HAZARDS AND HAZARDOUS MATERIALS Would the project:**				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c)	Emit hazardous emissions or handle hazardous or involve acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildfires?	☐	☐	☒	☐

Setting

The proposed Project site is bounded by the Metropolitan Transportation Authority (MTA) Gold Line to the north, North San Fernando Road to the east, Humboldt Street to the south, and North Avenue 19 to the west (Figure 4). The MTA Gold Line is supported on an approximately 17-foot-high fill embankment slope. The proposed Project site vicinity comprises commercial properties, railroad tracks, the Los Angeles River, and freeways. The Los Angeles River and the Interstate 5 Highway are located approximately 450 feet and 0.2-mile to the west of the proposed Project site, respectively. The ground surface of the Goodwill parking lot consists of asphalt, concrete and the ground surface of the City of Los Angeles property is generally unpaved with scattered gravel and deteriorated asphalt concrete pavement on the west side.

Based on review of historical sources, the proposed Project site was developed as early as 1906 for commercial and industrial uses (a fruit cannery, a can factory and a pottery company). By 1920, the proposed Project site was fully developed with a can factory and warehouses and an auto service use at the north end. By the 1950s, the can factory had been converted to a furniture factory, the auto service use was gone, and the northern end of the proposed Project site

contained a machine shop. The western end of the proposed Project site was improved with small shops along North Avenue 19. By the early 1970s, the factory was converted to manufacturing closet goods. The machine shop occupied the northern end of the proposed Project site and western side was occupied by small offices. By the 1980s, the proposed Project site appears to have been occupied by a variety of business types including food sales. These various uses continued until 2005, when the onsite improvements were demolished. LASAN has occupied the site since 2005.

The past industrial use of the proposed Project site (factories, auto service and machine shop) indicates the potential for past releases of contaminants of concern (COC) and/or onsite disposal of COC to have impacted the site. Environmental regulations regarding chemical storage and hazardous waste disposal were not prevalent until the mid-1980s. Therefore, the historical use of the site represents a suspect recognized environmental concern (REC) for the site.

In addition, soil sampling and testing for COCs was conducted onsite in 2001 by others. Elevated concentrations of total petroleum hydrocarbons (in the diesel fuel or oil range) and lead were detected. Low concentrations of VOCs were detected, and trace quantities of semi-volatile organic compounds were detected. No pesticides or polychlorinated biphenyls were detected. The detected contaminants appeared to be confined to the southern end of the proposed Project site in the location of abandoned railroad tracks that underlie the site. No sampling appears to have been conducted on the northern end of the site. The detection of COC onsite in the past is a REC for the site.

Discussion

a-b) **No Impact.** a significant hazard resulting from the foreseeable upset of hazardous materials would be less than significant. The proposed Project will use potentially hazardous materials during construction and operation. During construction, fuels, oils and solvents will be used on equipment. All potentially hazards materials will be used, stored, and transported according to manufacturer's specifications and all local, state, and federal laws. Potentially hazardous materials such as acids and bases will be used and stored at the site for water quality sampling. Storage and use of these materials will be according to the manufacture's specifications.

To ensure compliance with applicable law, including acquiring all necessary permits for the storage and use of these materials, Mitigation Measure Hazardous Materials 1 from the 2013 FEIR will be implemented as Regulatory Compliance Measure RC-HAZ-1 as a standard condition that is required by law to apply to the proposed Project:

Regulatory Compliance Measure RC-HAZ-1: Prior to approving any new industrial uses in the Project Area that will involve the use of hazardous materials and the generation, storage, transport, and disposal of hazardous wastes, the City of Los Angeles shall ensure that the proposed uses can be fully permitted in accordance with all applicable local, State, and federal requirements addressing use of hazardous materials or the generation, storage, transport, and disposal of hazardous wastes. This will require review and approval of the proposed industrial uses by the LAFD. The City shall also continue to regulate all existing industrial operations in the Project Area to ensure they comply with the same requirements.

The 2013 FEIR is consistent with the above analysis, including the implementation of the 2013 FEIR's mitigation measure as a regulatory compliance measure in the proposed Project and the conclusion that there would be less than significant hazardous materials

impacts. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

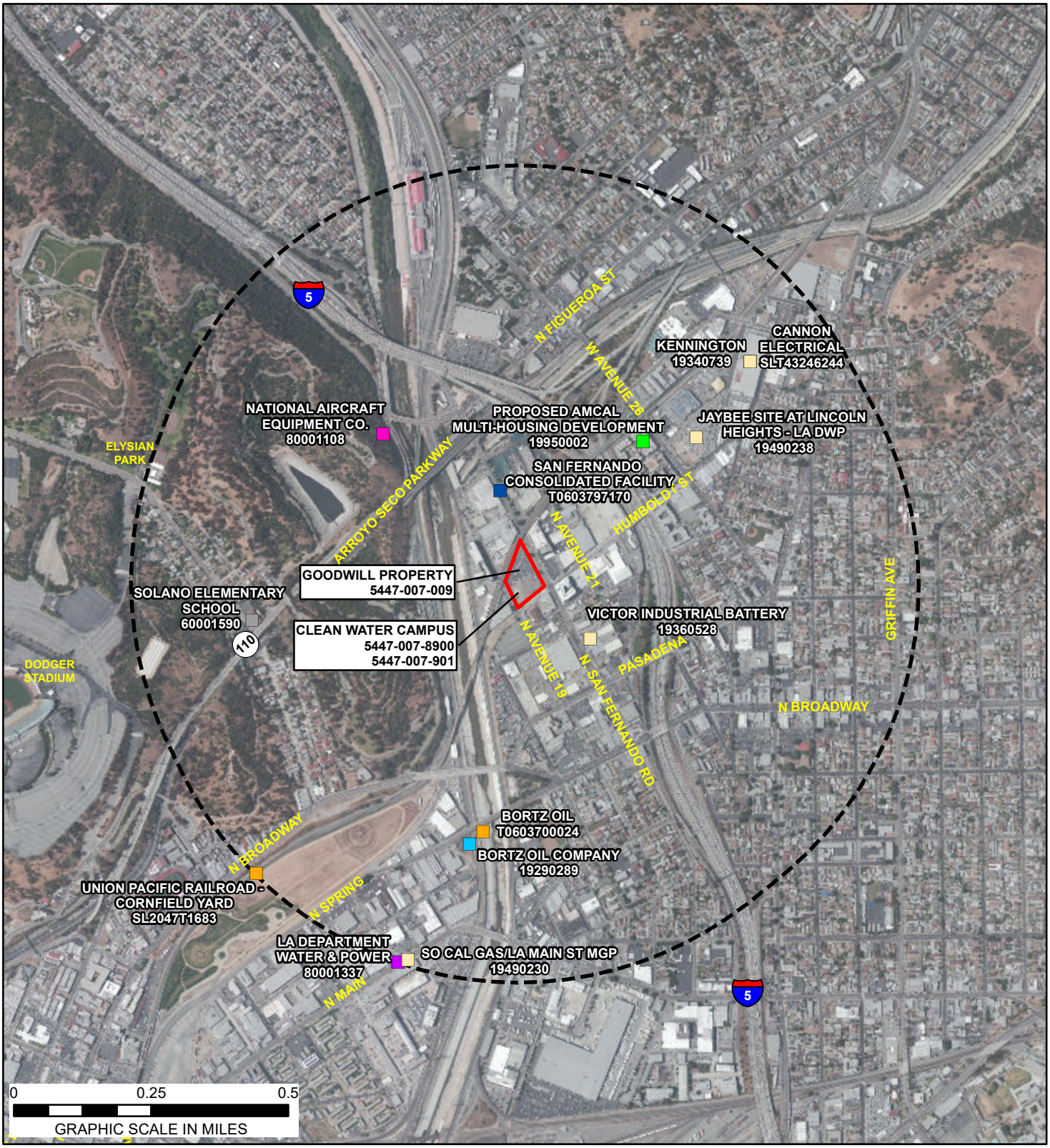
c) **No Impact.** There are no schools located within 0.25 miles of the CWC project area. The closest school is Solano Elementary School, which is located approximately 0.50 miles to the west miles from CWC.

d) **No Impact.** The Cortese list is a compilation of information from various sources listing potential and confirmed hazardous waste and hazardous substances sites in California. Review of the regulatory databases did not identify any potential hazardous materials site within the vicinity of the proposed Project site.

The 2013 FEIR indicated that the Pollock Well Field is listed on the National Priorities List. However, the Pollock Well Field is located 3 miles north of the proposed Project site. The 2013 FEIR identified three other sites listed by the California Department of Toxic Substances Control but are not within the proposed Project area. These sites are:

- Jaybee Ajax Manufacturing, 301 West Avenue 26;
- Kennington Ltd., 3209 Humboldt Street; and
- NI West Incorporated, 3011 Humboldt Street.

An updated database inquiry was conducted using data from the State Water Resources Control Board's Geotracker database and the California Department of Toxic Substances Control's Envirostor database. The query requested all sites within 3,600-foot radius of the proposed Project site. Eight sites occurred within the query radius, but none were within the footprint of the CWC Building or parking structures as shown on Figure 4. Table 19 summarizes the findings.



LEGEND

PROJECT SITE

3,600-FT RADIUS OF PROJECT SITE

CLEAN UP SITES:

- STATE RESPONSE
- VOLUNTARY CLEANUP
- EVALUATION
- SCHOOL INVESTIGATION
- MILITARY EVALUATION
- CORRECTIVE ACTION
- LUST CLEANUP SITE
- CLEANUP PROGRAM SITE

AERIAL IMAGE SOURCE: ESRI WORLD IMAGERY (CLARITY) BASEMAP

N

LOS ANGELES SANITATION AND ENVIRONMENT
CLEAN WATER CAMPUS

CLEAN UP SITES IN THE VICINITY OF THE CWC PROJECT AREA

ARCADIS Design & Consultancy for natural and built assets

FIGURE 4

User: ldrum Location: WVD
Path: T:\LA\SAN\mxd\Fig2_CleanUpSites.mxd 10/16/2020

Table 19. Geotracker and Envirostor Results

Site Name	Site Address	Within Project Footprint	Description
Bortz Oil Company	1746 North Spring St	No	State Response Certified O&M – Land Use Restrictions Only
Cannon Electrical	3209 Humboldt Ave	No	Cleanup Program Site Open - Inactive
Jaybee Site at Lincoln Heights	301 West Avenue 26	No	Voluntary Cleanup – Active
Kennington	3209 Humboldt Ave	No	Voluntary Cleanup – Active
National Aircraft Equipment Co	433 Casanova St	No	Military Evaluation - Inactive
PROPOSED AMCAL MULTI-HOUSING DEVELOPMENT	306-360 W. Ave. 26	No	Current Evaluation – Active
Solano Elementary School	615 Solano Ave	No	School Investigation – No Further Action
Victor Industrial Battery	138 N San Fernando Rd	No	Voluntary Cleanup Certified O&M – Land Use Restrictions Only

The proposed Project area is not listed on the Cortese list pursuant to Government Code Section 65962.5 or located within listed properties identified by the Geotracker or Envirostor databases. The proposed Project would not create a significant hazard to the public or the environment as a result of being included on a list of hazardous materials sites pursuant to Government Code 65962.5.

e) No Impact. The CWC is not located within two miles of a public airport. The closest airport is the San Gabriel Airport located approximately 11 miles to the east. The proposed Project is not anticipated to provide a safety hazard for people working near the proposed Project site because of its distance from an airport.

f) Less than Significant Impact. The proposed Project may require partial closure of North San Fernando Road, Humboldt Street or North Avenue 19 during construction. However, these partial closures are not anticipated to impede emergency vehicle access to the proposed Project site or to the surrounding areas and appropriate detours would be

established, if necessary to maintain emergency access to the proposed Project site and vicinity. Prior to the issuance of a building permit, the Los Angeles Fire Department (LAFD) will require an emergency response plan be submitted for review and approval. The emergency response plan will include but will not be limited to mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of closest hospitals, as well as police and fire departments. Compliance with this City condition of approval would ensure impacts related to emergency response plans to less than significant.

The 2013 FEIR analysis of impacts on emergency response plans did not expressly incorporate the above analysis. However, as shown above, the proposed Project would result in less than significant impacts and would not result in a different impact conclusion from the 2013 FEIR.

g) Less than Significant Impact. The proposed Project is located within an urban area generally not subjected to wildfires. The LAFD does not include the proposed Project within its Very High Fire Hazard Zone (VHFHZ) map for brush fires (LAFD 2021). However, the VHFHZ begins to the west of the Southern Pacific Railroad tracks, approximate 650 feet to the west from the proposed Project site. The nearest wildland-urban interface occurs approximately 1,000 feet to the west at Elysian Park. The emergency response plan described above will include evacuation routes in the event of wildfires. Compliance with this City condition of approval would reduce impacts related to emergency response plans to less than significant.

The 2013 FEIR analysis of impacts on wildland fires did not expressly incorporate the above analysis. However, as shown above, the proposed Project would result in less than significant impacts and would not result in a different impact conclusion from the 2013 FEIR.

X. Hydrology and Water Quality

Issues (and Supporting Information Sources):	Impact relative to the certified 2013 FEIR determinations: Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY— Would the project:				
a) Violate any water quality standards or waste discharge requirement or otherwise substantially degrade surface or groundwater quality?	☐	☐	☐	☒
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:	☐	☐	☐	☒
i) result in a substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite	☐	☐	☐	☒
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Setting

As described in the 2013 FEIR, the proposed Project site is located within the Los Angeles River Watershed. Overall, the Los Angeles River flows approximately 51 miles from its origin in the San Fernando region of the City of Los Angeles to Long Beach Harbor and to the Pacific Ocean. The Los Angeles River occurs to the west of the proposed Project site and is a concrete-line channel within its reach adjacent to the proposed Project area.

The proposed Project is not located in or near a floodplain or Federal Emergency Management Agency (FEMA) flood zone (NAVD 88) (Los Angeles County Department of Public Works Flood Zone Determination Website 2020). In addition, the proposed Project is not located within a flood area per the FEMA, National Flood Insurance Program Flood Insurance Rate Map for the City of Los Angeles.

The majority of surface area within the proposed Project site are impervious and currently paved with concrete or asphalt for an area of approximately 62,000 square feet of existing impervious

surface. Portions of the LASAN materials yard are unpaved and the total area of existing impervious surface is approximately 42,000 square feet of pervious surface.

Discussion

a) No Impact. Because the proposed Project area is greater than 1 acre, the proposed Project will be required to comply with the State Water Resources Control Board's General Construction Storm Water Permit (Order No 2009-0009 DWQ). The Construction General Permit requires the preparation of a site-specific SWPPP and the development of best management practices to minimize soil erosion and sedimentation from leaving the construction area and entering the storm drains during construction. The proposed Project will also be required to comply with the City's Stormwater and Urban Runoff Pollution Control Ordinance (LAMC 64.70).

The proposed Project will also be required to comply with the City's Low Impact Development Standards, which require all development and redevelopment projects that create, add, or replace 500 square feet or more of impervious surface. During operation of the proposed Project, there is potential for the generation of runoff with the discharge of pollutants from vehicles, landscaping pesticides, and other materials. Under the LID ordinance, the proposed Project will be required to capture ¾ inch during a 24-hour rainfall event based on the Los Angeles County 85 percentile precipitation map.

b, e) No Impact. The proposed Project does not involve withdrawal or use of groundwater. The proposed Project will excavate to approximately 28 feet below ground surface if the parking structure has two lower levels. Construction of the below ground parking structure is not expected to reach groundwater, which is anticipated at 30 feet below ground surface. In the event that groundwater is encountered it will be placed into a baker tank and offhauled from the proposed Project site. Because excavation is not expected to reach the groundwater table, significant amounts of groundwater are not expected to be encountered. Impacts related to decreasing groundwater supplies or substantially deplete groundwater would be less than significant.

The majority of the proposed Project site is paved or has been previously developed and is not considered an area that provides a significant source of groundwater recharge. Because the proposed Project site is not a significant source of groundwater recharge, impacts associated with impediment of groundwater recharge would be less than significant.

c i, iii-v) No Impact. The proposed Project will not alter the existing drainage patterns onsite and result in an increase of impervious surface nor will the proposed Project result in an alteration of a stream or river or result in flooding.

c-ii) **No Impact.** The proposed Project area is located in an area with an extensive storm water drainage system. As discussed in the 2013 FEIR, there are 32 storm water drainage systems within in the vicinity of the proposed Project area that drain to the Los Angeles River or the Arroyo Seco. Because the proposed Project site has been extensively developed, the existing stormwater drainage system is adequate to support development of the CWC and not create flooding on or offsite. The proposed Project will be required to implement the LID, which will requires a reduction in impervious surface and the retention of stormwater.

d) No Impact. According to the 2013 FEIR, the proposed Project site is not located in an area that would be subjected to a seiche or mudflow. No large bodies of water are located within the proposed Project vicinity that would result in a seiche or mudflow.

According to the Los Angeles County Tsunami Hazard Maps, the proposed Project is not listed in the tsunami hazard zone (California Department of Conservation 2021).

The 2013 FEIR is consistent with the all the above analysis (a) through (e), including the conclusion that there would be less than significant hydrology impacts. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

XI. Land Use and Planning

		Impact relative to the certified 2013 FEIR determinations			
Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
11.	**LAND USE AND LAND USE PLANNING— Would the project:**				
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Setting

The CWC would be located at the corner of North San Fernando Road and Humboldt Street in downtown Los Angeles. The proposed Project area is zoned Urban Innovation and is located within the CASP. As described in Section 2.6, the proposed Project will be required to comply with the CASP for specific planning and design standards.

Discussion

a) No Impact. The proposed Project will construct an employment center in an area that is zoned as Urban Innovation. The proposed Project site has been developed since 1906 and is surrounded by existing roads and infrastructure. Construction of the CWC will not change the existing roadway structure and would not divide an established community.

b) Less than Significant Impact. The proposed Project is located within the CASP and would be required to comply with the specific planning and design standards identified in the CASP. As described in 2.6 Compliance with the CASP, the proposed Project will comply with the CASP but is anticipated to need adjustments/exceptions for the following components:

- **Setback from North San Fernando Road** – The CASP allows 0 to 15 feet setback from all streets. The proposed Project will achieve the required setback requirements on Humboldt and Avenue 19, however the CWC will be offset more than 15 feet from North San Fernando due to the existing 96-inch and 60-inch sewers on the east side of the LASAN owned property.
- **Curb Cuts** – The CASP prohibits curb cuts on Secondary Modified Collector Streets such as North San Fernando Road and Collector Modified Streets such as Avenue 19. There are currently three curb cuts on North San Fernando Road, one of which is actively used for vehicular traffic. The proposed Project will install a total of two curb cuts on North San Fernando Road, one approximately at the same location as one of the existing curb cuts and a second one further south than the existing curb cuts. There are currently three curb cuts on Avenue 19, all of which are actively used for vehicular traffic. The proposed Project will install one curb cut on Avenue 19 approximately at the location of the existing northern most curb cut.

- **Building heights** - The proposed parking structure would be higher than the 75-foot building height limit identified in the CASP.

LASAN will provide the Department of City Planning with an application for adjustments/exceptions from the CASP. The Department of City Planning will review LASAN's application and determine whether the adjustments/exceptions will be approved. It is anticipated that the exceptions required for the CWC are considered minor exceptions and would not result significant environmental impacts due to the minor deviations required for the proposed Project. Table 20 below summarizes the requirements and justification for the exception.

Table 20.16 CASP Exception Summary

Component	CASP Requirement	Exception	Justification
Setback on North San Fernando	Setbacks must be 0-15 feet	No setbacks on North San Fernando Road	Because of the location of existing sewer infrastructure that cannot be relocated, no setbacks on North San Fernando Road cannot be accommodated.
Curb cuts	Curb cuts are not permitted on Secondary Modified Collector Streets or Collector Modified Streets	North San Fernando Road is designated as a Secondary Modified Collector Street. North Ave 19 is designated a Collector Modified Street. Curb cuts are proposed for both of these streets	Existing curb cuts on both North San Fernando Road and North Avenue 19 accommodate existing vehicular traffic. To avoid disruption of existing traffic flow and development of new curb cuts on Humboldt Street, the proposed Project will use one existing curb cut on North San Fernando Road and one existing curb cut on North Avenue 19
Building Heights	The average building height cannot be greater than 75 feet high	For the CWC, the building height will be up to 105 feet above grade	To accommodate the need for additional parking for residential and commercial

	development within the CASP planning area, the proposed Project will provide 200 additional spaces for public or private use. The additional parking spaces would provide a benefit to the CASP planning area, including being consistent with state legislative intent in providing jobs in areas served by major transit options.

In general, specific plans allow for minor exceptions to its requirements where strict application would result in practical difficulties to a project but when the project meets the intent and goals of the specific plan. The proposed Project, even with the three exceptions, remains consistent with intent and goals of the CASP and would not be detrimental to the public welfare. The exceptions required for the proposed Project do not result in overall conflicts with the CASP and impacts would be considered less than significant.

As the proposed Project would be consistent overall with the CASP and would result in less than significant land use impacts, it would not result in a different impact conclusion from the 2013 FEIR.

XII. Mineral Resources

		Impact relative to the certified 2013 FEIR determinations			
Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
12.	**MINERAL RESOURCES—Would the project:**				
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Setting

The 2013 FEIR evaluated the potential for impacts related to mineral resources. Mineral resource sites in the City of Los Angeles are classified by State Mining and Geology Board (SMGB). The regional significance of mineral resources in accordance with the California Surface Mining and Reclamation Act of 1975 (SMARA). The SMGB uses a classification system that divides land into four Mineral Resource Zones (MRZs) that have been designated based on quality and significance of mineral resources. The proposed Project area is classified as MRZ-2 as shown on Figure 6-5 in the 2011 DEIR.

Discussion

a-b) No Impact. The proposed Project is located in an urbanized are in downtown Los Angeles. There are no known mineral resources in the vicinity of the proposed Project. The 2013 FEIR identified the CASP project area as being classified as a MRZ 2. An MRZ-2 is defined as an area where adequate formation indicates the potential for mineral deposits. Within the proposed Project Area, the MRZ-2 follows the Los Angeles River and is shown on Figure 6-5 in the 2011 DEIR. As analyzed in the FEIR 2013, the loss of aggregate from the MRZ-2 area within the CASP project area is remote owing to the Los Angeles River being channelized and the abundance of aggregate in the vicinity of the CASP planning area.

Historically, the Los Angeles Basin was known to be a source of petroleum. However, the proposed Project area is located outside areas that would provide sources of petroleum. The proposed Project site is not located in an Oil Drilling/Surface Mining Supplemental Use District or City-Designated Oil Field Drilling Area.

Therefore, the potential for mineral resources to occur within the proposed Project area is low. Implementation of the proposed Project would not result in the loss of the availability of a known mineral resource or loss of availability of a locally important mineral resources.

The 2013 FEIR is consistent with the above analysis and the conclusion that there would be no impacts on mineral resources. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

XIII. Noise

		Impact relative to the certified 2013 FEIR determinations			
	Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
13.	**NOISE—Would the project:**				
a)	Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?	☐	☐	☒	☐
b)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c)	For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people be residing or working in the area to excessive noise levels?	☐	☐	☐	☒

Setting

General Noise Information

Noise is generally defined as any sound that is undesirable because it interferes with speech and hearing, is intense enough to damage hearing, or is otherwise annoying. Certain frequencies are given more “weight” during assessment because human hearing is not equally sensitive to all frequencies of sound. The A-weighted decibel (dBA) scale corresponds to the sensitivity range for human hearing. Noise levels capable of being heard by humans are measured in dBA. A noise level change of 3 dBA or less is barely perceptible to average human hearing. However, a 5 dBA change in noise level is clearly noticeable. A 10 dBA change is perceived as a doubling or halving of noise loudness, while a 20 dBA change is considered a “dramatic change” in loudness. Table 21 provides typical instantaneous noise levels of common activities in dBA.

Table 171. Typical Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Concert
Jet Fly-over at 1,000 feet	100	
Gas Lawn Mower at 3 feet	90	
Diesel Truck at 50 feet, at 50 miles per hour (mph)	80	Food Blender or Garbage Disposal at 3 feet
Noisy Urban Area Daytime Gas Lawn Mower at 100 feet	70	Vacuum Cleaner at 10 feet
Commercial Area Heavy Traffic at 300 feet	60	Normal Speech at 3 feet

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Quiet Urban Daytime	50	Large Business Office, Dishwasher in Next Room
Quiet Urban Nighttime	40	Theatre, Large Conference Room (Background)
Quiet Suburban Nighttime	30	Library
Quiet Rural Nighttime	20	Bedroom at Night
	10	Broadcast/Recording Studio (background level)
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing

Source: California Department of Transportation 1998

An individual's sound exposure is a value based on a measurement of the noise that the individual experiences over a specified time interval. A sound level is a measurement of noise that occurs during a specified period. However, noise impact evaluations under CEQA are based on the project-related increases to the existing community noise levels.

A community noise environment varies continuously over time with respect to the contributing sources. Within a community, ambient noise levels gradually change throughout a typical day, and the changes can often be correlated to the increase and decrease of transportation noise or to the daytime/nighttime operation of stationary mechanical equipment.

In addition to sound, construction activities also have the potential to create ground vibrations, depending on the kind of equipment and operations involved, and the distances between the construction activities and the nearest sensitive receptors. The effects of groundborne vibrations generated from construction activities are typically imperceptible to most people located outside the immediate proximity of the construction activities. However, high-magnitude vibrations can result in damage to nearby structures within the immediate vicinity of the source.

A noise study was conducted for the proposed Project in 2017. Two sensitive receptors were identified: The nearest sensitive receptors to the Project are residences and are shown on Figure 2. One multi located at the southwest (Sensitive Receptor (SR-1) and southeast (SR-2) corners of North San Fernando Road and Humboldt Street (Figure 5). SR-1 is approximately 100 feet from the proposed CWC and SR-2 is approximately 150 feet from the CWC (Figure 5).

According to LAMC, Section 111.03, this area is presumed to have a daytime ambient level of approximately 60 dBA based on the typical ambient for this type of zoning. However, this does not take into account the noise associated with highways Interstate-5 and Interstate-110, as well as the Metro Gold Line. Using traffic volume information for Interstate-5 and Insterstate-110 from Caltrans, Arcadis created a predictive noise model using CadnaA (Computer Aided Noise Abatement) software. The noise model indicated a daytime ambient level of 69 dBA, and a nighttime ambient of 61 dBA (Arcadis, 2017).

SR-1: Sensitive Receptor 1
SR-2: Sensitive Receptor 2

Los Angeles Sanitation and Environment
Clean Water Campus

Noise Sensitive Receptors

ARCADIS

FIGURE
5

Discussion

a) Less than Significant Impact. The proposed Project will generate temporary noise during construction. The use of heavy equipment and machinery will create noise in excess of existing noise levels. It is estimated that excavation/grading phase will be the loudest activity at an average of 89 dBA at 50 feet (Table 22). This translates to 83 dBA at SR-1 and 79 dBA at SR-2, respectively.

Table 182. Existing Ambient Noise Level

Construction Phase	Aggregate Noise Emission Values		
	50ft	**SR-1**	**SR-2**
Ambient Noise Level		61	69
Clearing and Grading	84	78	74
Excavation	89	83	79
Foundation	77	71	67
Building Construction	84	78	74
Finishing	89	83	79

- Per the City of Los Angeles CEQA thresholds, temporary construction activities would be significant if they could last more than one day with noise levels exceeding existing ambient noise levels by 10 dBA or more at a noise sensitive use; last more than 10 days in a three month period exceeding ambient noise levels by 5 dBA or more at a noise sensitive use; or exceed the existing ambient noise levels of 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at anytime on Sunday.. The increase in temporary noise levels during construction would be considered to be potentially significant per City of Los Angeles significance thresholds for Noise without implementation of project design features, regulatory compliance measures, or other measures (City of Los Angeles 2006).

  To ensure construction noise impacts are less than significant, Mitigation Measure Noise and Vibration 2 from the 2013 FEIR will be implemented as Project Design Feature Noise and Vibration 1 (PDF-NV-1) as an integral part of the proposed Project to utilize best construction practices:

PDF-NV-1: Section 112.05 and Section 41.40 of the City of Los Angeles Municipal Code has noise ordinances to monitor or regulate construction noise. These ordinances have noise limits for construction activities in conjunction with restrictions to working hours for certain activities. To minimize the impact of construction activities associated with implementation of the proposed Project, the City of Los Angeles shall require:

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday, and any other permissions

under applicable law, including under LAMC 41.40, shall otherwise conform to this PDF and applicable law, including CEQA.

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Whenever construction occurs adjacent to occupied residences (on or offsite), temporary barriers shall be constructed around the construction sites to shield the ground floor of the noise-sensitive uses. These barriers shall be of ¾-inch medium density plywood sheeting, or equivalent, and shall achieve an STC of 30 or greater, based on certified sound transmission loss data taken according to American Society for Testing and Materials Test Method E90 or as approved by the City of Los Angeles Building Department.
- Construction equipment staging areas shall be located as far as feasible from residential areas while still serving the needs of construction contractors.
- Quieter “sonic” pile drivers shall be used, unless engineering studies are submitted to the City of Los Angeles showing this is not feasible and cost effective, based on geotechnical considerations.
- Groundborne vibration impacts from construction activities shall be considered in the construction programs to minimize the disturbance to noise-sensitive receptors.
- Routes for heavy construction site vehicles shall be identified to minimize noise and vibration impacts to residences and noise-sensitive receptors. Activities that generate high noise levels — such as pile driving and the use of jackhammers, drills, and impact wrenches — shall be restricted to the hours of 7:00 am to 9:00 pm.
- In the event of night work is necessary, implementation of y other measure(s) that would, in combination with all of the above measures, would reduce the increase (based on 1-hour Leq) of existing ambient exterior noise levels (measured in CNEL) of less than 5 dBA at a noise sensitive use.

With the implementation of PDF-NV-1 the temporary increase in noise levels would reduce the overall increase in noise to below the 2006 CEQA thresholds. Because of the temporary nature of the construction, and with the incorporation of these PDFs, noise impacts associated with the construction phase will be less than significant under the City of Los Angeles CEQA Thresholds for Noise (2006).

The majority of work will occur between the hours of 7:00 am to 6:00 pm Monday through Friday and 8:00 am to 6:00 pm on Saturdays. No work would occur on Sundays. However, some work may need to occur outside these hours because of critical phases of work such as concrete pouring or when safety dictates work needs to continue. In the event of night work, measures will be implemented under PDF-NV-1 to reduce noise impacts on sensitive receptors to below the significance thresholds. A nighttime noise variance would be obtained from the Executive Director of the Board of Police Commissioners in compliance with LAMC

41.40 if necessary. The 2013 FEIR found that, even with the imposition of Mitigation Measure Noise and Vibration 2, certain temporary construction noise impacts would be significant and unavoidable (see RP-DEIR, Volume I.). However, based on the above, the proposed Project, including implementation of PDF-NV-1, would result in less than significant temporary construction noise impacts, and would be within the scope of the 2013 FEIR.

The CWC at the corner of North San Fernando Road and Humboldt Street does not have any major noise producing equipment associated with operations. While there will be additional cars and people associated with the new operations, the noise impacts to the environmental ambient level will be less than significant. The new parking structure proposed will bring with it noise associated with day-to-day operations which can be seen in Table 23. Because of the distance to any sensitive receptors, noise levels from these operations are shown to be less than significant.

Table 193. Parking Structure Noise at 50 Feet.

Source	Level (dBA)
Autos at 12mph	44
Sweeper	66
Car Alarm Signal	63
Car Alarm Chirp	48
Car Horn	63
Door Slams or Radios	58
Talking	30
Tire Squeals	60

Source: Gordon Bricken & Associates, 1996. Estimates are based on actual noise measurements taken at various parking lots.

The 2013 FEIR found that, even with the imposition of Mitigation Measure Noise and Vibration 3 related to noise control measures for HVAC and utility transformers, the operational noise impacts may be significant and unavoidable (see DEIR, Chapter 12.) However, based on the above, the proposed Project would result in less than significant operational noise impacts. Therefore, the proposed Project would be within the scope of the 2013 FEIR.

b) No Impact. Implementation of the proposed Project will result in a temporary increase in vibration from construction activities. This increase would be considered temporary and

would not be percussive. There are no adopted State or City of Los Angeles ground-borne vibration standards. Based on federal guidelines, the proposed project would result in a significant construction or operational vibration impact if:

The proposed project would expose buildings to the Federal Railway Administration (FRA) building damage threshold level of 0.5 inches per second PPV; and/

The proposed project would exceed the Federal Transit Administration (FTA) vibration impact criteria of 75 VdB

Using vibration levels for typical construction equipment previously published in a noise and vibration impact assessment by the FRA in 2005, impacts from the closest construction site (CWC) were calculated for SR-1 and SR-2. The following formulas were used:

$$PPV_{equip} = PPV_{ref} \times \left(\frac{25}{D}\right)^{1.5}$$

Where: PPV (equip) is the peak particle velocity in in/sec of the equipment adjusted for distance

PPV (ref) is the reference vibration level in in/sec at 25 feet

D is the distance from the equipment to the receiver

And:

$$L_V(D) = L_V(25ft) - 20\log\left(\frac{D}{25}\right)$$

Where: Lv (D) is the level in VdB at distance D

The results of the vibration calculations can be seen in Table 24. The largest vibration impacts will translate to .011 inches PPV (or 75 VdB) at SR-1, and .006 inches PPV (or 71 VdB) at SR-2 and would occur only during construction. Since these impacts do not exceed the federal guidelines of 0.5 inches PPV or 75 VdB, impacts associated with the generation of groundborne vibration or groundborne noise levels would be less than significant.

Table 204. Vibration Calculations at Sensitive Receptors

Equipment	25ft		SR-1		SR-2	
	PPV (in/sec)	VdB	PPV (in/sec)	VdB	PPV (in/sec)	VdB
Large Bulldozer	0.089	87	0.011	75	0.006	71
Loaded Trucks	0.076	86	0.010	74	0.005	70
Jackhammer	0.035	79	0.004	67	0.002	63
Small Bulldozer	0.003	58	0.0004	46	0.0002	42

Source: FRA, 2005

The 2013 FEIR found that, even with the imposition of Mitigation Measure Noise and Vibration 4 related to vibration, vibration impacts may be significant and unavoidable (see DEIR, Chapter 12.) However, based on the above, the proposed Project would result in less than significant vibration impacts, and therefore the proposed Project would not result in additional vibration impacts relative to the 2013 FEIR analysis.

c) **No Impact**. The proposed Project is not located within two miles of a public airport or airstrip or within an airport land use area. The closest airport to the proposed Project site is the San Gabriel Airport located approximately 11 miles east of the proposed Project site.

XIV. Population and Housing

		Impact relative to the certified 2013 FEIR determinations			
Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
14.	**POPULATION AND HOUSING— Would the project:**				
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Setting

The proposed Project is an office building to consolidate facilities for LASAN. The approximately 400 employees that would occupy the CWC are current employees of LASAN. As described in Section 2 Project Description, a maximum of 50 workers would be on-site during construction. It is anticipated that construction personnel will be derived from the local region.

Discussion:

a-b) No Impact. The proposed Project does not involve the construction of new homes and would not require the displacement of existing housing. As described in Section 2.2, Project Description, the proposed Project site is currently used for parking and materials storage. The approximately 400 workers that will be located at the CWC would be current LASAN employees. During construction, workers are expected to be derived from the Los Angeles region. Construction and operation of the proposed Project would not directly or indirectly induce substantial population growth.

The 2013 FEIR is consistent with the above analysis and the conclusion that there would be less than significant impacts on population and housing. Therefore, the proposed Project would not result in additional impacts relative to the 2013 FEIR analysis.

XV. Public Services

		Impact relative to the certified 2013 FEIR determinations			
Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
15. PUBLIC SERVICES— Would the project:					
a)	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
i)	Fire protection?	☐	☐	☐	☒
ii)	Police protection?	☐	☐	☐	☒
iii)	Schools?	☐	☐	☐	☒
iv)	Parks?	☐	☐	☐	☒
v)	Other public facilities?	☐	☐	☐	☒

Setting

Police: The proposed Project is located within the jurisdiction of the Los Angeles Police Department (LAPD) Central Bureau. The proposed Project site would be served by the LAPD Northeast Community Police Station located at 3353 San Fernando Road approximately 0.5 mile from the proposed Project site.

Fire: Fire protection for the proposed Project site is provided by the LAFD. LAFD Fire Station 1 located at 2230 Pasadena Avenue, approximately 0.5 mile from the proposed Project site. According to the 2013 FEIR, Fire Station 1 is staffed with 12 LAFD staff at all times and is supported by Fire Station 4 located at 800 North Alameda Street in Chinatown.

Schools: The proposed Project is located within the Los Angeles Unified School District Local District 5.

Parks; There are several parks and recreational opportunities within the vicinity of the proposed Project area. The potential impacts on parks and recreation are discussed in Section XVI.

Other Public Services. The Los Angeles Public Library provides library services for the vicinity of the proposed Project Area. Libraries within close proximity of the proposed Project include the Arroyo Seco Library located at 6145 North Figueroa Street, the main branch for the Northeast Area, and the Chinatown Library located at 639 North Hill Street**.**

Discussion

a.i-v) **No Impact.** Implementation of the proposed Project will not result in the need for construction of new or physically altered public facilities. Construction of the proposed Project will bring an increase of temporary workers during construction. In the event of an injury or accident during construction. Police or fire service could be required but would not require construction or alteration of existing facilities. As described in Section IX Hazards

and Hazardous Materials, appropriate emergency access to the proposed Project site and surrounding area would be maintained at all times during construction. Therefore, access and response times for police and fire services would not be altered as a result of construction.

Because workers would be derived from the local area, no new schools, parks or other public facilities would be required. Construction personnel may use local libraries or other public services, but the use would be temporary during construction and would not result in degradation of existing facilities.

Operation of the proposed Project will bring up to 400 existing LASAN employees to the proposed Project location. As analyzed in the 2013 FEIR, as part of standard development approval in the City of Los Angeles, project plans for specific projects are reviewed by LAPD and LAFD and development applicants would be required to incorporate recommendations from LAPD or LAFD into final design of the project. Standard conditions of approval for safety and adequate emergency access are required; development of the proposed Project would not alter response times or other performance objectives.

The City of Los Angeles will verify that adequate services exist prior to issuance of occupancy permits. During operation of the proposed Project, an accident or injury could occur at CWC, current staffing levels are adequate at local LAPD and LAFD to provide emergency services when and if they happen and would not require new facilities or expansion of existing police or fire facilities to be constructed. Because the proposed Project is an employment center, it would be primarily occupied Monday through Friday during the typical work week limited the potential need for emergency services.

LASAN employees may use libraries and other public facilities periodically, but the use would not be so extensive that the need for new or expansion of existing facilities would be required.

Operation of the proposed Project will bring 400 existing employees to the proposed Project location compared with existing conditions, but it would not result in the need to physically alter facilities, alter response times or service ratios, or other performance objectives and impacts would be less than significant.

The 2013 FEIR is consistent with the above analysis and the conclusion that there would be less than significant impacts on public services. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

XVI. Recreation

		Impact relative to the certified 2013 FEIR determinations			
	Issues (and Supporting Information Sources):	***Potentially Significant Impact***	***Less Than Significant with Mitigation Incorporation***	***Less Than Significant Impact***	***No Impact***
16.	**RECREATION—Would the project:**				
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☐	☒
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

Setting

The CWC is located within an industrial and commercial area with limited parks and recreation facilities. Recreational facilities within 2 miles of the proposed Project include:

- Confluence Park;
- Lacy Street Neighborhood Park;
- Lincoln Heights Recreation Center;
- Downey Recreation Center and Pool; and
- Elysian Park.

Discussion

a-b) No Impact. The CWC will bring approximately 400 employees to the downtown area. Workers would likely use local parks and community centers during their breaks and before and after work. Local community centers could see an increase in use by CWC workers. However, an increase in use by CWC workers would not be considered significant. Workers would use the facilities during the work week (Monday through Friday). Overall, use of local parks and recreation facilities would be minimal as most workers would use facilities closer to their residences. Use of parks and recreation facilities would not be increase such that substantial degradation would occur or that deterioration would develop. Impacts related to CWC employee use would be less than significant.

Construction of the CWC and use of park and recreation facilities would not require the construction of new parks and recreation facilities. The CWC will provide one square foot of open space for every 48 square feet of office building space adding to the recreation or open space area within the vicinity of the proposed Project. The open space area provided by the proposed Project would be used by CWC employees and other uses. Because CWC would provide additional open space compared with existing conditions and employee use would not result in increased degradation of existing facilities, proposed Project impacts related to the construction of new recreation or expansion of existing facilities would be less than significant.

The 2013 FEIR is consistent with the above analysis and the conclusion that there would be less than significant impacts on recreation. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

XVII. Transportation

		Impact relative to the certified 2013 FEIR determinations			
Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
17.	**TRANSPORTATION AND TRAFFIC— Would the project:**				
a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b)	Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d)	Result in inadequate emergency access?	☐	☐	☒	☐

Setting

A traffic impact study was prepared for the proposed Project and is provided in Appendix G (KOA 2021). The proposed Project site is bounded by the Metro L Line rail tracks to the north, North San Fernando Road to the east, Humboldt Street to the south, and Avenue 19 to the west within the City of Los Angeles. The traffic study for the proposed Project includes the following seven study intersections along the primary access routes to and from the site:

1. Avenue 19 & San Fernando Road;
2. San Fernando Road & Riverside Drive/Figueroa Street;
3. San Fernando Road & Humboldt Street;
4. Avenue 19 & Pasadena Avenue;
5. San Fernando Road/Avenue 20 & Pasadena Avenue;
6. Interstate 5 (I-5) SB Off-Ramp/Avenue 21 & Pasadena Avenue; and
7. I-5 NB Ramps & Pasadena Avenue.

Existing Roadway Conditions

All the roadway classifications are based on the Mobility Plan 2035 element from the City of Los Angeles General Plan. The key roadways within the study area are described here. The discussion is limited to specific roadways that traverse the study intersections and serve the proposed Project site.

- San Fernando Road is classified as a Modified Avenue II. This north-south roadway provides two travel lanes in each direction. On-street parking is generally permitted on both sides of the roadway, and the posted speed limit is 35 miles per hour (mph). Humboldt Street is classified as a Modified Industrial Local Street. This east-west roadway provides one travel lane in each direction. On-street parking is generally permitted on both sides of the roadway. The prima facie speed limit is 25 mph. Avenue

19 is classified as a Modified Collector. This north-south roadway provides one travel lane in each direction. On-street parking is generally permitted on both sides of the roadway, and a bike lane facility is provided on both sides of the roadway. The posted speed limit is 30 mph.

- Avenue 20 is classified as a Modified Avenue II between Pasadena Avenue and Broadway and as a Modified Collection south of Broadway. This north-south roadway provides one travel lane in each direction. On street parking is generally permitted on both sides of the roadway, and the posted speed limit is 35 mph.
- Avenue 21 is classified as a Modified Local Street. This north-south generally provides one travel lane in each direction, except at its intersection with Pasadena Avenue, where Avenue 21 merges with the I-5 southbound ramps. On-street parking is generally permitted on both sides of the roadway north of Pasadena Avenue. The prima facie speed limit is 25 mph.
- Pasadena Avenue is classified as an Avenue II. This is an east-west roadway that provides two travel lanes in each direction. East of Avenue 21, Pasadena Avenue is identified as a High Injury Network (HIN). On street parking is permitted at select locations along the roadway. The posted speed limit is 35 mph.
- Riverside Drive is classified as an Avenue I. This north-south roadway generally provides one travel lane in each direction. Riverside Drive intersects with Figueroa Street via a traffic circle with Riverside Drive forming the western leg continuing north parallel to the Los Angeles River. The Los Angeles River Greenway Trail, which provides a Class I bicycle path, runs parallel to the northbound lane. On-street parking is prohibited on both sides of the roadway.
- Figueroa Street is classified as an Avenue I. Within the study area, this generally northeast-west roadway provides one to two travel lanes in each direction. On-street parking is prohibited on both sides of the roadway. The posted speed limit is 35 mph.

Existing Transportation Conditions:

Transit service is provided within 0.50-mile radius from the proposed Project site which is operatedby the Los Angeles County Metropolitan Transportation Authority (Metro).

- **Rail**: Gold Line Stop: Lincoln Heights/Cyprus Park Station
- **Bus Routes**: 28, 68, 84, 251

Upon approval of SB 743, the State of California Governor's Office of Planning and Research (OPR) was tasked with developing new guidelines for evaluating transportation impacts under the CEQA. As a result, automobile delay and level of service (LOS) that once served as indicators of performance are no longer metrics of performance for environmental and transportation impacts under CEQA. Local impact standards for traffic circulation are discussed in the next and subsequent sections.

Under the new guidelines, performance metrics promote the reduction of greenhouse gas emissions and the development of diverse multimodal networks of mobility. Therefore, OPR established that under the new guidelines for CEQA, VMT would be established as the primary indicator in evaluating environmental and transportation impacts.

The LADOT adopted VMT in 2019 and has updated the traffic guidelines to now include VMT as the CEQA impact metric for traffic studies. The 2013 FEIR analyzed traffic impacts using LOS but consistency with current guidelines from OPR and LADOT, VMT was used in this Addendum. Therefore, as part of the updated guidelines, the following LADOT recommended standards were used in determining impacts from the proposed Project:

1. Conflicts with City plans, programs, ordinances, or policies
2. Causes substantial VMT
3. Substantially increases hazards due to a geometric design feature or incompatible use(s)

Discussion

a) Less than Significant Impact. The City has adopted numerous plans that promote safety for all motorists, pedestrians, bicyclists, and transit riders. The review of the applicable plans and policies includes the following:

- Mobility Plan 2035
- Plan for A Health Los Angeles
- Los Angeles Vision Zero Plan
- Citywide Design Guidelines• Los Angeles Municipal Code (LAMC)
- Transit Oriented Communities (TOC) Program Guidelines
- Southern California Association of Governments (SCAG) Regional Transportation Plan
- (RTP)/Sustainable Communities Strategy (SCS)
- City Planning Department's Walkability Checklist

The proposed Project would be required to comply with all applicable programs, policies, and ordinances as a part of conditions of approval. Therefore, the proposed Project does not directly conflict with a plan, policy or program supporting multimodal transportation or public safety. Therefore, no further review of the compliance with the City plans, policies and ordinances is required and there would be less than significant impacts.

The 2013 FEIR pre-dated some of the applicable plans and policies, and 2013 FEIR analysis of impacts on applicable transportation plans was based on the then-effective plans and policies. However, as shown above, the proposed Project would result in less than significant impacts under the currently applicable plans and policies and would not result in a different impact conclusion from the 2013 FEIR.

b) Less than Significant Impact. LADOT has updated its traffic study guidelines to ensure compliance with the City goal of reaching a 20 percent reduction in VMT by 2035 as outlined in the Mobility Plan 2035, as well as Section 15064.3, subdivision (b)(1) of the CEQA Guidelines, which considers whether or development project would result in a substantial increase in VMT. In order to determine which development projects would conflict with CEQA guidelines as mentioned in section 15064.3, screening criteria are used to determine whether further analysis of a project land use is required. Both criteria must be met in order to require further analysis of a land use project VMT contribution:

1. Would generate a net increase of 250 or more daily vehicle trips.

2. Would generate a net increase in daily VMT.

Projects that contain retail or restaurant components that are small-scale or local-serving in nature can be assumed not to cause significant VMT impacts for the retail/restaurant portion of the proposed land use. Small-scale and local-serving are defined as the total retail and restaurant square footage not exceeding 50,000 square feet; and for mixed-use developments, if the retail/restaurant does not exceed 50,000 square feet in size, can be considered less-than-significant VMT impacts. If the above two screening criteria are not met, further VMT analysis should be conducted. Should further analysis be required beyond the initial screening, TAG promotes further analysis of VMT of a land use project by analyzing (1) Household VMT per capita and (2) work VMT per employee. Where the household VMT per capita is the home-based VMT produced by the residential component of a land-use project divided by the number of residents within the development. The work VMT per employee is the home-based work VMT attracted by the non-residential uses of a land use project divided by the number of employees within the development. In order for proposed land use project to have less-than-significant VMT impacts, both criteria must be satisfied:

(1) The land use project's household VMT per capita must be at least 15 percent below the average Area Planning Commission (APC) household VMT per capita, and

(2) The land use project's work VMT per employee must be at least 15 percent below the average Area Planning Commission (APC) work VMT per employee.

Depending on the proposed project location, each of the corresponding Area Planning Commission (APC) thresholds determines the appropriate significance thresholds that are set 15 percent below the average household VMT per capita as well as 15 percent below average work VMT per employee. These thresholds are defined in Table 25.

Table 21. LADOT Significance Thresholds for VMT Impacts

LADOT Thresholds for Significant VMT Impacts		
Area Planning Commission	**Daily Household VMT per capita**	**Daily Work VMT per employee**
Central	**6**	**7.6**
East LA	**7.2**	**12.7**
Harbor	**9.2**	**12.3**
North Valley	**9.2**	**15**
South LA	**6**	**11.6**
South Valley	**9.4**	**11.6**
West LA	**7.4**	**11.1**

The Project would generate a net increase in daily VMT which would be a significant impact. Therefore, further analysis of VMT impacts is required beyond the initial screening criteria review.

The analysis evaluated VMT for the project government office use (analyzed as commercial office, the closest rate to the proposed use in the VMT Calculator) component based on the work VMT per employee. As the Project does not contain a residential component, the household VMT

per capita does not apply. The results indicate that the Project work VMT per employee of 14.9 exceeds the APC average household VMT per capita threshold of 12.7 (15 percent below the APC average) for the East LA Area APC. Implementation of Project Design Feature Transportation 1 (PDF-TR-1) as a an integral part of the proposed Project to utilize best operational practices and comply with applicable codes and policies which would provide additional TDM strategies to reduce VMT per capita, would ensure impacts to less than significant.

PDF-TR-1: The following TDM strategies that would ensure the Project's VMT impacts would be less than significant and result in a work VMT per employee of 12.7:

- The Project will provide bicycle parking per Code. This is considered a Project feature.
- Additional TDM strategies for mitigation purposes include the following:
- Providing transit subsidies at a daily amount of $1.49
- Implementing a voluntary travel behavior change program
- Employer-sponsored vanpool or shuttle

From this analysis, it is concluded that with consideration of the Project features and PDF-TR 1, VMT impacts would ensure to be less than significant. The VMT Calculator trip generation and VMT worksheets are provided in Appendix B of the Traffic Impact Study (Appendix G).

The 2013 FEIR pre-dated the VMT requirements in state law and City thresholds and guidelines, and 2013 FEIR analysis of impacts on transportation impacts was based on the then-effective law, including analysis under the LOS standard. The 2013 FEIR also found that in certain intersections transportation impacts from the CASP would be significant and unavoidable, despite the imposition of mitigation measures. However, as shown above, the proposed Project would result in less than significant impacts under the currently applicable law, including VMT, and would result in no additional impacts relative to the 2013 FEIR.

c) Less than Significant Impact. In line with Vision Zero, potential impacts resulting from roadway modifications as part of a proposed development are carefully assessed per LADOT's Transportation Assessment Guidelines. Such impacts are determined on the basis of a proposed project's driveway location and resulting conflicts with vehicular, pedestrian, and bicycle traffic.

In order to determine which development projects would result in impacts due to geometric design hazards or incompatible uses, TAG establishes two screening criteria to determine if further analysis of a project's land use is required. If either of the following criteria is present for a proposed development project, further analysis of the potential driveway is required.

1. The project proposed new driveways or introduces new vehicular access to the property from the public right-of-way.

2. The project proposes to, or is required to, make modifications to the public right-of-way (e.g. street dedications, reconfigurations of curb line, etc.). Vehicular access surrounding the site would be modified. For the two driveways on North San Fernando Road, one existing driveway would remain and the other driveway will be relocated; there would be one driveway on Avenue 19 that is located in the same location as the Project driveway; and a new

driveway will be constructed on Humboldt Street for the below grade parking structure two-way driveway The Project is required to provide a seven foot street dedication on Avenue 19 and a five foot street dedication on Humboldt Street. Although no street dedication is required on North San Fernando Road, the sidewalk will be widened from 12 feet to 15 feet.

Construction of the Project would affect the public right-of-way and some driveways surrounding the site, but the benefits of these modifications would create a safer walking environment through the widening of the sidewalk and a larger Project setback on North San Fernando Road along with the replacement of existing sidewalks and addition of street trees.

The 2013 FEIR pre-dated the VMT requirements in state law and City thresholds and guidelines, and 2013 FEIR analysis of impacts on transportation impacts was based on the then-effective law. However, as shown above, the proposed Project would result in less than significant impacts on hazards under the currently applicable law, and would not result in a different impact conclusion from the 2013 FEIR.

d) Less than Significant Impact. During construction, emergency access to the proposed Project site and to the surrounding areas will be maintained at all times as described in Section IX Hazards and Hazardous Materials. All ingress and egress for the proposed Project will be designed to the all-City Building and Safety Code, and LAFD requirements. Therefore, construction and operation of the proposed Project would not result in impacts related to inadequate emergency access.

The 2013 FEIR pre-dated the VMT requirements in state law and City thresholds and guidelines, and 2013 FEIR analysis of impacts on transportation impacts was based on the then-effective law. However, as shown above, the proposed Project would result in less than significant impacts on emergency access under the currently applicable law, including as set forth in the Hazards and Hazardous Materials analysis above, and would not result in a different impact conclusion from the 2013 FEIR.

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XVIII. Tribal Cultural Resources

	Impact relative to the certified 2013 FEIR determinations			
Issues (and Supporting Information Sources):	***Potentially Significant Impact***	***Less Than Significant with Mitigation Incorporation***	***Less Than Significant Impact***	***No Impact***
18. Tribal Cultural Resources— Would the project:				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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), or	☐	☐	☒	☐
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 American tribe.	☐	☐	☒	☐

Discussion

a-b) Less than Significant Impact. Given the developed and disturbed nature of the project area, Tribal Cultural Resources are unlikely to exist on the ground surface. Furthermore, as set forth in the Cultural Resources analysis above, a records search revealed no previous cultural resources investigations that included the proposed Project area, including for Tribal Cultural Resources.

However, buried resources may exist within the project area. To ensure potential impacts to Tribal Cultural Resources are less than significant, **RC-CR-1(a) and 1(b),** and RC-ER-2 described above in Section IV Cultural Resources shall be implemented. In addition, if any buried resources are encountered that could qualify as a Tribal Cultural Resource, Native American consultation shall be conducted per applicable law to develop and implement appropriate treatment measures. Work shall not continue in the area of the find until consultation with the participating Tribes has concluded and the appropriate treatment measures have been implemented.

The 2013 FEIR pre-dated the tribal consultation requirements in state law, and 2013 FEIR analysis of impacts on such impacts was based on the then-effective law in its Cultural Resources analysis. However, as shown above, the proposed Project would result in less than significant impacts on tribal cultural resources under the currently applicable law and would not result in a different impact conclusion from the 2013 FEIR.

XIX. Utilities and Service Systems

		Impact relative to the certified 2013 FEIR determinations			
Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
19.	**UTILITIES AND SERVICE SYSTEMS—Would the project:**				
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant effects?	☐	☐	☐	☒
b)	Have sufficient water supplies available to serve project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
c)	Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d)	Generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e)	Comply with federal, state and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

a) No Impact: Construction of the CWC will require installation of water, wastewater, stormwater, electric power and telecommunications facilities.

Water and Wastewater:

LASAN will be relocating 420 staff to the CWC. However, the majority of these staff are currently employed and working at one of the five division in Media Centers.As described in Section VI Energy, design of the CWC will meet several City and State efficiency standards for energy conservation. The CWC will be designed to meet LEED Gold efficiency standards. Therefore, operation of the CWC will not require the relocation, construction or expansion of new water or wastewater facilities. The LADWP currently has capacity to provide potable water to the CWC.

Wastewater will be served by the LASAN Hyperion Water Reclamation Plant. As analyzed in the 2013 FEIR, the Hyperion Water Reclamation Plant has sufficient capacity to treat wastewater generated by projects identified in the CASP until 2035. Because sewer connections are made on a first-come first-served basis and the CWC is one of the first major project implemented under the CASP, it is possible for capacity to be reduced as additional projects are implemented under the CASP. Design of the CWC will include water and wastewater efficiencies that will reduce the burdens on water supply and wastewater treatment. However, to ensure that CWC does not

result in excess waste water or exceed the capacity of water or wastewater, Mitigation Measure Utilities 2 from the 2013 FEIR, implemented as **PDF-UT-1**, which requires adequate planning and design accommodations to provide for wastewater efficiencies, will be implemented as an integral part of the proposed Project to utilize best management practices. PDF-UT-1: During the planning and development of specific projects within the Project Area as a result of the Proposed Alternative the following mitigation measures shall be implemented as applicable:

- The project shall include a holding tank large enough to hold three times the project daily wastewater flow so that the tank would hold all project wastewater during peak wastewater flow periods for discharge into the wastewater collection system during off-peak hours.
- A grey water system to reuse wastewater from the project.
- Offset excess wastewater generation by restricting the wastewater generation of other land uses within the same service area (e.g., by dedicating open space); and
- New wastewater treatment or conveyance infrastructure, or capacity enhancing alterations to existing systems.
- The proposed Project will be required to meet the City's LID standards for stormwater management.

The 2013 FEIR is consistent with the above analysis, including the implementation of the 2013 FEIR's mitigation measure as a project design feature in the proposed Project and the conclusion that there would be less than significant impacts on water, wastewater, stormwater, electric power and telecommunications facilities. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

b) **No Impact.** LADWP provides water services to the CWC. LADWP's water supply sources include the Los Angeles Aqueduct, the Metropolitan Water District of Southern California, and groundwater supplies. The LAA provides LADWP with approximately 50 percent of its water during most water years. The CWC will be designed to be water efficient and will meet the requirements of the City of Los Angeles.

The 2013 FEIR is consistent with the above analysis and the conclusion that there would be less than significant impacts on water supplies. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

c) **No Impact.** As set forth above, the City has sufficient wastewater treatment capacity to serve the proposed Project's projected demand. The 2013 FEIR is consistent with the above analysis, including the implementation of the 2013 FEIR's mitigation measure as a project design feature in the proposed Project and the conclusion that there would be less than significant impacts on wastewater. Therefore, the proposed Project would result in no additional impacts relative to the 2013 FEIR analysis.

d) **Less than Significant Impact.** During construction, solid waste will be generated during the demolition of existing structures and pavement and excavation for the parking structure. Materials will be characterized and deposited at an appropriate landfill permitted to accept the type of waste generated. Waste types are anticipated to be asphalt, concrete, piping, and soil. As described in Section 2 Project Description, materials off hauled from the site will be taken to CLARTS or another authorized landfill for appropriate recycling or not appropriate for recycling or reuse, for disposal. Currently, CLARTS permitted capacity is 4,025 tons per day and present capacity is 2,500 tons per day (LASAN 2021). As described in Section 2, Project Description, the proposed project is expected to deposit approximately 68,000 cubic yards of material during construction. It is anticipated that some of this material

will be suitable for recycling or reuse, reducing the amount of solid waste deposited in the landfill. However, in the event no portion is appropriate for recycling or reuse, the deposition of 68,000 cubic yards, a relatively small amount of material, would not result in reducing the overall capacity at CLARTS or other appropriate landfill and impacts related to solid waste generation would be less than significant.

Personal protective equipment will be managed as potentially hazardous waste and will be collected and off hauled. Portable toilets will be provided during construction and will be managed by a private solid waste service. The proposed Project will comply, to the extent feasible, with the City's waste diversion goals.

During operation of the proposed Project, solid waste and recycling will be managed by a private collection service. The CWC will have facilities for recycling and trash that will comply with the CalGreen waste reduction measures. Recycling facilities will promote the recycling of glass, paper, and metal.

By meeting the City's waste diversion goals and CalGreen waste reduction measures, operation of the proposed Project would not exceed State or local standards and impacts would be less than significant.

e) **Less than Significant Impact.** The generation, handling, storage, and transportation of solid waste during construction and operation of the proposed Project will comply with all local, state, and federal regulations. As previously discussed, solid waste produced during the Project will be disposed at CLARTS or other appropriate landfill facility with the capacity to accept solid waste during construction. Solid waste generated during operation would be reduced by meeting recycling strategies required by the City and CalGreen code. Therefore, no impacts will occur.

The 2013 FEIR pre-dated some of the applicable solid waste policies, and 2013 FEIR analysis of impacts on such impacts was based on the then-effective. However, as shown above, the proposed Project would result in less than significant impacts on solid waste under the currently applicable law and would not result in a different impact conclusion from the 2013 FEIR.

XX. Wildfire

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

Setting

The proposed Project is located in an urban area, primarily with industrial and commercial land use. According to the California Public Utilities Commission, the proposed Project is not located within a High Fire Threat Zone (CPUC 2021)The LAFD does not show the proposed Project area within its VHFHSZ (LAFD 2021).

Discussion

a) Less than Significant Impact. Emergency access to the proposed Project site and the surrounding area will be maintained at all times during construction and operation of the proposed Project. As described in Section IX Hazards and Hazardous Materials and Section XVII Transportation, the proposed project will maintain emergency access to the proposed Project site and the vicinity at all times.

b) Less than Significant Impact. The nearest VHFHSZ is located approximately 1,000 feet to the west of the proposed Project site ad Elysian Park. In the event of a fire in this location, smoke and ash could be blown into the proposed Project area. However, given the location of the proposed Project and the VHFHSZ, the likelihood of uncontrolled wildlife is low. In the event of a wildfire within the VHFHSZ, occupants of the proposed Project would evacuate to the east and away from the fire, smoke and ash.

The 2013 FEIR analysis of wildfire impacts did not expressly incorporate the above analysis. However, as shown above, the proposed Project would result in less than significant impacts and would not result in a different impact conclusion from the 2013 FEIR.

c) No Impact. The proposed Project is located within an urban area and not within a designated VHFHSZ. Existing surface streets would provide sufficient evacuation routes for CWC employees and not installation or maintenance of infrastructure would be required.

d) No Impact. As identified in the 2013 and discussed in Section IX Hazards and Hazardous Materials, the proposed Project site is not located in an area subject to flooding or landslides.

The proposed Project site is generally flat and there are no nearby slopes that would be subjected to instability or drainage changes in the event of a fire.

XXI. Mandatory Findings of Significance

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

Discussion

a) Less than Significant Impact. The 2013 FEIR evaluated the potential impacts related to implementation of the CASP. Checklist III Biological Resources and Cultural and Tribal Resources Section. Implementation of the CWC will not result in significant changes to the conclusions made in the 2013 FEIR. As described in Section III Biological Resources, the proposed Project area provides limited habitat for wildlife species, wetlands, and there is no habitat present to support state or federal special status species. Impacts on biological resources would be less than significant.

As described in Section IV Cultural Resources and XVIII Tribal Resources, impacts associated with major periods of history or pre-history would be less than significant. The one archeological resource that was identified has been heavily disturbed with does not meet CRHR eligibility requirements. Because of the extensive development of the proposed Project site, no tribal resources are anticipated. The proposed Project would implement RC-CR 1(a) and 1(b) and RC-ER-2 in the event of unintended discovery of artifacts or human remains.

b) Less than Significant Impact. The 2013 FEIR evaluated the potential cumulative impacts associated with implementation of the CASP. The 2013 FEIR evaluated the potential for cumulative impacts related on Land Use, Transportation, Visual Resources, Earth Resources, Hydrology and Water Quality, Biological Resources, Cultural Resources, Hazardous Materials, Noise and Vibration, Population and Housing, Utilities and Air Quality.

The 2013 FEIR evaluated the maximum demand for each resource area listed above, and certain significant and unavoidable cumulative impacts were identified.

The 2013 FEIR examined cumulative projects within the Project Area as defined in Chapter 1 of the DEIR. In general, the Project Area included City of Los Angeles Council District 1. Since the certification of the 2013 FEIR four additional projects than those listed in Table 7-1 have been proposed within Council District 1; two of which are within the CASP planning area. Table 26 summarizes the additional projects within the Project area.

Table 226. Cumulative Projects List

Project Name	Address	Project Owner	Project Description	Square Footage	Status
1111 Sunset	1111-1115 Sunset Blvd	1111 Sunset Blvd, LLC	Demolition of four structures and construction of up to 778 residential units, up to 98 hotel rooms, up to 48,000 sf of office space and up to 95,000 sf of general commercial space	262,437	DEIR Comment period ended April 26, 2021
Elysian Park Lofts	1251 N. Spring Street, 1310, 1322, 1380, 1030, 1040, and 1050 N Broadway		Development of mixed-use residential and commercial retail consisting of approximately 920 residential units, including 17 live-work units, 17,941 sf retail and 5,465 sf leasing office.	1,159,800	NOP Issued November 6, 2017, Extension for Comments issued February 2, 2018
1457 N Main Street	1457 N Main Street	1457 N. Main Property, LLC	Demolition of existing two-story structure, construction of 123,363 sf, six story mixed use building with 244 live-work units	123,363	Under construction
169 N Ave 21	169 N. Ave 21, 168 and 176 N. San Fernando Road, 163, 169, 173 and 181 N. Ave 21	4SITE Real Estate	Demolition of 12 existing structures, and construction of an approximately 114,536 sf, six story mixed use development with 100	114,536	Letter of Determination Issued August 1, 2019

	residential units, 100 hotel units, and 4,946 sf of commercial retail space.

Similar to the analysis of related projects in the CASP EIR section on cumulative effects, the proposed Project would not have a significant cumulative effect based on the updated related project lists for the following reasons: (1) The related projects are adjacent to major transit routes, which provides benefits in terms of potential transportation VMT reductions; (2) As with the CWC, the projects listed above would be subject to mitigation measures, regulatory compliance measures, or project design features that when considered cumulatively, would reduce impacts to less than significant; (3) As described in this Addendum, the proposed Project would not result in new or more severe significant environmental impacts from those identified in the 2013 FEIR; and (4) Impact areas such as air quality, GHG, and Transportation already take into account cumulative conditions. Therefore, compared with potential impacts associated with the updated cumulative projects list, the CWC would not result in cumulative impacts.

Furthermore, as stated above, the proposed Project is consistent with the CASP, and the areawide cumulative impacts of the proposed Project were adequately addressed in the certified CASP FEIR pursuant to CEQA Guidelines 15130(d).

c) **Less than Significant Impact.** As described in this Addendum, implementation of the CWC would not result in new impacts or an increase in severity of impacts compared with what was analyzed in the 2013 FEIR. All potentially significant impacts on humans as a result from the implementation of the CWC would be less than significant, including through the implementation of certain applicable mitigation measures from the 2013 FEIR as regulatory compliance measures and project design features. Because impacts on humans would be mitigated to less than significant, implementation of the proposed Project would not cause substantial adverse effects on humans.

Incorporation of Feasible Mitigation Measures Developed in the Program EIR

Pursuant to CEQA Guidelines Section 15168(c)(3) and consistent with CEQA Guidelines 15168(c)(4) checklist analysis provided in this Addendum, LASAN will incorporate the mitigation measures adopted with the 2013 FEIR on June 28, 2013, as set forth in the Mitigation Monitoring Plan adopted with the 2013 FEIR. As described above, applicable mitigation measures identified in the 2013 FEIR would be applied to potential impacts from the proposed Project as regulatory compliance measures or project design features as described in this Addendum and summarized in Appendix H.

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APPENDIX A

Cornfield Arroyo Seco Specific Plan 2013 Final Environmental Impact Report

APPENDIX B

CalEEMOD Calculations

APPENDIX C

Health Risk Assessment

APPENDIX D

California Natural Diversity Database

APPENDIX E

Cultural Resources Technical Report

APPENDIX F

Fuel Use Calculations

APPENDIX H

Regulatory Compliance Measures &

Project Design Features