



**CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY/DRAFT MITIGATED NEGATIVE DECLARATION**

LADOT All-Electric Bus Maintenance Facility



Prepared for:
**City of Los Angeles Department of Transportation
and
Department of Public Works
Bureau of Engineering**

Prepared by:

PARSONS

September 2022

<p align="center">CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING 1149 S. BROADWAY, LOS ANGELES, CA 90015 CALIFORNIA ENVIRONMENTAL QUALITY ACT <u>DRAFT</u> MITIGATED NEGATIVE DECLARATION (Article I, City CEQA Guidelines)</p>		
LEAD AGENCY AND ADDRESS:	City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, Suite 600 Los Angeles, CA 90015-2213	COUNCIL DISTRICT 8
PROJECT TITLE: LADOT All-Electric Bus Maintenance Facility		
PROJECT LOCATION: 740-780 and 800 East 111 th Place, Los Angeles, CA 90059		
<p>DESCRIPTION: The City of Los Angeles is planning to build a new Electric Bus Maintenance Facility (EBMF or the proposed project) to support a larger and cleaner zero-emissions bus fleet. The project will be implemented by the Los Angeles Department of Transportation (LADOT). LADOT has identified the 5.5-acre site at 740-780 and 800 East 111th Place in South Los Angeles as a potential site for this facility. The subject site is currently developed with two industrial buildings that are being utilized as a logistics warehouse for solar panels. To build the new EBMF, the existing buildings would be demolished, and the site would be cleaned up. The proposed EBMF would be composed of a two-story operations and maintenance building, 11 bus maintenance bays, a service building, a bus wash building, a bus parking/charging area, and a second-story parking deck with a canopy, and a photo-voltaic (PV) system. Electrification equipment, including electrical transformers, switch cabinets, and bus chargers would also be included.</p> <p>The project would enable LADOT to provide maintenance services, parking, charging, and inspection functions to approximately 130 Battery-Electric Buses (BEBs) to be used for the DASH and Commuter Express (CE) services provided by LADOT Transit. It would also be used to store and dispatch the electric buses for daily service. Approximately 312 employees would be working on-site and the facility would be open 24 hours per day, 7 days a week.</p> <p>The proposed facility would eliminate the need to use the existing South Los Angeles Bus Maintenance Facility at 14011 South Central Avenue in the City of Compton, which is located approximately 2 miles to the south.</p>		
NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY: N/A		
FINDING: The City Engineer of the City of Los Angeles has determined that the proposed project will not have a significant effect on the environment with mitigation measures incorporated. See attached Initial Study.		
SEE THE ATTACHED PAGES FOR ANY MITIGATION MEASURES IMPOSED		
Any written comments received during the public review period will be attached, together with the responses of the lead City agency.		
THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED		
PERSON PREPARING THIS FORM: Lauren Rhodes Environmental Specialist II	ADDRESS: 1149 S. Broadway, Suite 600 M/S 939 Los Angeles, CA 90015	TELEPHONE NUMBER: (213) 485-5753
SIGNATURE (Official): Maria Martin, Environmental Affairs Officer Environmental Management Group		DATE:

**LADOT All-Electric Bus Maintenance Facility
Mitigation Measures**

Biological Resources

MM-BIO-1: To avoid impacts to migratory birds, the vegetation removal, demolition, and site clearing activities shall occur during the non-breeding season (e.g., between September 1 and February 15). If such activities would have to be scheduled during this period, a qualified biologist shall conduct a preconstruction nesting bird survey to determine if any nesting birds are present within the site. This survey should be conducted no more than 7 days before the start of vegetation removal. If nesting birds are found, an exclusionary buffer would be set up and clearly marked around each active nest site. Construction or clearing shall not be conducted within this zone until the qualified biologist determines that nesting birds have fledged or the nest is no longer active.

Cultural Resources

MM-PAL-1: A qualified paleontological monitor (i.e., one who meets the qualification standards established by the Society of Vertebrate Paleontology [SVP, 2010]) shall be retained prior to construction and shall remain on call during all ground disturbing activities. Worker Environmental Awareness Program (WEAP) training shall be provided to all construction and managerial personnel involved with the project's ground disturbing activities. The WEAP training shall provide an overview of paleontological resources and outline the regulatory requirements for their protection. The WEAP shall also cover the proper procedures to be followed in the event of a fossil discovery during construction. The WEAP training may be in the form of a video or PowerPoint presentation or printed literature (handouts) that can be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

MM-PAL-2 The qualified paleontological monitor will monitor project-related excavation activities in high paleontological deposits, if encountered in the subsurface. Project-related excavation activities greater than 5 feet depth shall be monitored on a part-time (i.e., spot-checking) basis to check for the presence of underlying paleontologically sensitive sediments. If paleontologically sensitive deposits are observed, full-time monitoring will be implemented in those areas. Excavations determined to be entirely within previously disturbed sediments or late Holocene-age deposits do not require paleontological monitoring or continued spot-checking.

MM-PAL-3 In the unanticipated event that fossil resources are discovered, they shall be protected from further excavation, destruction, or removal. Work will be halted within 25 feet of the discovery until they can be evaluated by a qualified paleontologist (i.e., one who meets the SVP professional

standards for Principal Investigator or Project Paleontologist). If determined to be scientifically important, the paleontological resources will be recovered, prepared to the point of curation, identified, and curated at the Natural History Museum of Los Angeles County or another accredited repository along with associated field data.

- MM-PAL-4** After ground-disturbing activities are completed, a memo report documenting the methods and results of paleontological monitoring will be prepared by the qualified paleontologist and submitted to the City of Los Angeles.

Hazards and Hazardous Materials

- MM-HAZ-1:** Additional site characterization to identify the lateral and vertical extents of PCE-impacted soil vapor and assess if groundwater beneath the site has been impacted shall be conducted. Following completion of site characterization, the City of Los Angeles shall report the “unauthorized release” to the appropriate agency for regulatory oversight. Once a case is opened, the City of Los Angeles shall comply with any additional characterization activities and subsequent remedial actions to the satisfaction of the regulatory oversight agency to protect constructions workers, facility workers, and neighboring residences from exposure to impacted media (i.e., soil, groundwater, and/or soil vapor).
- MM-HAZ-2:** Before construction, a Soil Management Plan (SMP) shall be developed to provide construction workers with guidelines from a health and safety perspective (e.g., use of personal protective equipment, action levels, etc.) on handling impacted media that is encountered during any subsurface disturbance activities. The SMP shall describe site- and project-specific protocol to be followed in the event of encountering chemically impacted soil. The SMP shall also facilitate excavation activities by having a structured plan in place for the handling, characterization, and disposal of impacted soil wastes.
- MM-HAZ-3:** Additional measures, as recommended in the Phase II Environmental Site Assessment (ESA) and/or the additional Site Characterization to be performed for the project site, shall be taken to protect the proposed facility's workers. These measures may include, but are not limited to:
- All stored chemicals, equipment, underground storage tanks (USTs), and waste/debris shall be removed from both properties before purchase. Once removed, a pre-acquisition inspection should be performed to confirm the removal of all hazardous materials and other solid and liquid wastes stored on the properties.
 - Due to the contaminant plume potentially extending offsite, consultation with legal counsel is needed to determine if notification to the Los Angeles Regional Water Quality Control Board (LARWQCB) of the

potential unauthorized release is warranted. Should a case be opened with the LARWQCB, additional action may likely be required, including detailed site characterization, active remediation, and the designation of a responsible party.

- Measures (i.e., engineering controls such as vapor barriers) shall be installed within new construction, to address residual impacts of tetrachloroethene (PCE) in soil vapor in the event remediation is not pursued or completed. These measures typically consist of the installation of either an active or passive venting system and/or the application of a vapor barrier that is chemically resistant to chlorinated solvents.

Noise

MM-NOI-1: To minimize noise impacts to area residents during project construction, the Contractor shall install a temporary noise barrier, which includes noise barrier fences, moveable noise barriers, and/or noise control curtains, with an effective height of 12 feet around the perimeter of the construction site. Temporary noise barriers may be made, for example, of concrete jersey barriers with 0.75-inch plywood attached to fence posts, or the noise control curtain material may be mounted or hung over perimeter chain-link fences.

Tribal Cultural Resources

MM-TCR-1: Due to the potential for tribal cultural resources to exist on the project site, prior to the commencement of any ground-disturbing activity at the project site, the City of Los Angeles (the City) shall retain a tribal monitor that is qualified to identify, record, and evaluate the significance of any archaeological and/or tribal cultural finds during construction. The qualified tribal monitor shall be from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (the Tribe). Ground-disturbing activities shall include removing pavement, potholing, auguring, grubbing, removing trees, boring, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or similar activity at the project site. The executed monitoring service agreement shall be submitted by the qualified tribal monitor to the City prior to any ground-disturbing activity. The qualified tribal monitor will complete logs describing each day's construction activities, locations, soil, and any cultural materials, human remains, and/or burial goods discovered. Tribal monitoring shall conclude when ground-disturbing activities on the project site have been completed, or when the qualified tribal monitor indicates any additional construction activity at the project site has little or no potential to impact tribal cultural resources. In accordance with PDF-CUL-1, prior to commencing any ground disturbing activities, the qualified archaeologist and the qualified tribal monitor shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground-disturbing activities that provides

information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground-disturbing activities. In addition, workers will be shown examples of the types of resources that would require notification to the archaeological monitor and tribal monitor.

Upon discovery of any subsurface object or artifact that may be a tribal cultural resource during the course of any ground-disturbing activity, procedures to ensure that tribal cultural resources are not damaged include but are not limited to the following steps:

- All such ground-disturbing activities shall cease in the immediate vicinity of the discovery, the radius of which will be determined by the qualified tribal monitor or the qualified archaeological monitor, until the qualified tribal monitor has evaluated the find in accordance with federal, state, and local guidelines.
- The found deposits shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribe and the tribal monitor, and in accordance with federal, state, and local guidelines.
- Personnel of the project shall not collect or move any archaeological or tribal resources or associated materials or publish the location of tribal cultural resources.
- If the resources are Native American in origin, the tribal monitor will make recommendations to the City regarding the monitoring of future ground-disturbing activities, as well as the treatment and disposition of any discovered tribal cultural resources, which may include but not limited to the preservation in place or recovery and retention of them in the form and/or manner which the tribal monitor and the Tribe deem appropriate for educational, cultural, and/or historic purposes. Until a recommendation is made, the discovery should be preserved in place or left in an undisturbed state. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur unless testing or studies already completed have adequately recovered the scientifically consequential information form and about the resource and this determination is documented by a qualified archaeologist or tribal monitor.
- The City shall implement the tribal monitor and Tribe's recommendations if the City can reasonably conclude that the recommendations are reasonable and feasible to mitigate or avoid any significant impacts to the identified tribal cultural resources. If the City does not accept a particular recommendation determined to be reasonable and feasible by the qualified tribal monitor, the City may request mediation by a mediator agreed to by the tribal monitor, the Tribe, and the City who has the requisite professional qualifications and experience to mediate such a

dispute. The City shall pay any costs associated with the mediation. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources.

- The ground-disturbing activities may recommence outside of a specified radius of the discovery site, so long as this radius has been cleared by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
- The location of the find of tribal cultural resources and the type and nature of the find will not be published beyond providing it to public agencies with jurisdiction or responsibilities related to the resources, the qualified archaeologist, qualified tribal monitor, and the Tribe.
- If the resources consist of non-Native American historic archaeological materials, a qualified archaeologist will apply National Register of Historic Places Criterion D to determine their significance. Artifacts will be curated per the Code of Federal Regulations 36 Part 79, as applicable, or be offered to a local historical society museum or educational facility, as deemed appropriate by the City.

SC-CUL-1 shall be implemented should human remains be inadvertently discovered at the project site. If the Gabrieleño Band of Mission Indians – Kizh Nation is designated Most Likely Descendant (MLD) by the Native American Heritage Commission (NAHC), the Koo-nas-gna Burial Policy shall be implemented. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be prepared by the MLD. Associated funerary objects reasonably believed to have been placed with individual human remains either at the time of death or later and made exclusively for burial purposes are to be treated with utmost respect and dignity. The prepared soil and cremation soils are to be treated in the same manner as intact bone fragments. Cremations will either be removed in bulk or by means necessary to ensure the complete recovery of all sacred materials.

In such cases where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate which can only be moved by heavy equipment. If this type of steel plate is unavailable, a 24-hour guard should be posted outside of working hours. The City will make every effort to divert project activities and keep the remains in situ and protected. If the project

cannot be diverted, it may be determined that the burials will be removed. The MLD will work closely with the City's designated qualified archaeologist and tribal monitor to ensure that the excavation is treated carefully, ethically, and respectfully. Each occurrence of human remains and associated funerary objects, sacred objects, and objects of cultural patrimony will be retained and reburied within six months of recovery in a secure container. If preservation in place is not possible despite good faith efforts, a site located within the project parcel footprint, as agreed to by the City and the Tribe, and to be protected in perpetuity, shall be designated for the respectful reburial of the human remains and/or ceremonial objects. There shall be no publicity regarding any cultural materials recovered.

Any data recovery plans shall require approval by the Tribe; such documentation will include detailed descriptive notes and sketches, at a minimum. Additional documentation as outlined in a treatment plan should also be approved by the Tribe. If additional data recovery is conducted, a final report will be submitted to the Tribe, Native American Heritage Commission, and South Central Coastal Information Center. No invasive and/or destructive diagnostics on human remains shall be conducted.

Cumulative Impacts

MM-CUM-1: The construction schedules of other projects in the vicinity should be coordinated with each other through communication among City departments and staff to avoid cumulatively affecting vehicle traffic, pedestrians, and bicyclists on Avalon Boulevard and East 111th Place.

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1.0 INTRODUCTION.....	1
1.1 Purpose of an Initial Study.....	1
1.2 Document Format.....	1
1.3 CEQA Process	2
2.0 PROJECT DESCRIPTION	4
2.1 Project Location and Setting.....	4
2.1.1 Location	4
2.1.2 Setting	4
2.2 Project Objectives.....	8
2.3 Project Description	8
2.3.1 Facility Components	11
2.3.2 Facility Operations	12
2.4 Project Schedule	14
2.5 Mitigation Measures, Standard Conditions, and Project Design Features	16
2.5.1 Summary of Standard Conditions, Project Design Features, and Mitigation Measures	17
3.0 ENVIRONMENTAL IMPACT ANALYSIS AND INITIAL STUDY CHECKLIST	31
3.1 Analysis Section Format.....	31
3.1.1 IS Checklist.....	31
3.1.2 Environmental Conditions.....	31
3.1.3 Environmental Impact Analysis.....	31
3.2 Aesthetics	33
3.2.1 Regulatory Setting	33
3.2.2 Existing Environment.....	35

3.2.3	Visual Impact Analysis	37
3.2.4	CEQA Checklist	47
3.3	Agriculture and Forestry Resources	50
3.3.1	Regulatory Setting	51
3.3.2	Existing Environment	52
3.3.3	Impact Analysis.....	52
3.4	Air Quality	54
3.4.1	Regulatory Setting	54
3.4.2	Existing Environment	60
3.4.3	Impact Analysis.....	63
3.4.4	Responses to CEQA Checklist	67
3.5	Biological Resources	77
3.5.1	Regulatory Setting	77
3.5.2	Existing Environment	80
3.5.3	Impact Analysis.....	81
3.5.4	Mitigation Measures.....	84
3.6	Cultural Resources	85
3.6.1	Regulatory Setting	85
3.6.2	Existing Environment	88
3.6.3	Impact Analysis.....	91
3.6.4	Project Design Features	94
3.7	Energy	97
3.7.1	Regulatory Setting	97
3.7.2	Existing Environment	101
3.7.3	Impact Analysis.....	102
3.8	Geology and Soils	106
3.8.1	Regulatory Setting	107
3.8.2	Existing Environment	108
3.8.3	Impact Analysis.....	109

3.9	Greenhouse Gas Emissions.....	118
3.9.1	Regulatory Setting	118
3.9.2	Existing Environment.....	123
3.9.3	Impact Analysis.....	125
3.10	Hazards and Hazardous Materials	130
3.10.1	Regulatory Setting	130
3.10.2	Existing Environment.....	136
3.10.3	Impact Analysis.....	140
3.10.4	Mitigation Measures.....	147
3.11	Hydrology and Water Quality.....	149
3.11.1	Regulatory Setting	149
3.11.2	Existing Environment.....	153
3.11.3	Impact Analysis.....	154
3.12	Land Use and Planning	160
3.12.1	Regulatory Setting	160
3.12.2	Existing Environment.....	161
3.12.3	Impact Analysis.....	162
3.13	Mineral Resources.....	168
3.13.1	Regulatory Setting	168
3.13.2	Existing Environment.....	169
3.13.3	Impact Analysis.....	170
3.14	Noise	171
3.14.1	Regulatory Setting	171
3.14.2	Existing Environment.....	178
3.14.3	Impact Analysis.....	180
3.14.4	Mitigation Measure	188
3.15	Population and Housing	189
3.15.1	Regulatory Setting	189
3.15.2	Existing Environment.....	190
3.15.3	Impact Analysis.....	190

INITIAL STUDY
LOS ANGELES DEPARTMENT OF TRANSPORTATION

3.16	Public Services	192
3.16.1	Regulatory Setting	192
3.16.2	Existing Environment	195
3.16.3	Impact Analysis.....	196
3.17	Recreation	199
3.17.1	Regulatory Setting	199
3.17.2	Existing Environment	200
3.17.3	Impact Analysis.....	200
3.18	Transportation	202
3.18.1	Regulatory Setting	202
3.18.2	Existing Environment	205
3.18.3	Impact Analysis.....	206
3.19	Tribal Cultural Resources	213
3.19.1	Regulatory Setting	213
3.19.2	Existing Environment	215
3.19.3	Impact Analysis.....	215
3.19.4	Mitigation Measure	217
3.20	Utilities and Service Systems	221
3.20.1	Regulatory Setting	221
3.20.2	Existing Environment	224
3.20.3	Impact Analysis.....	225
3.21	Wildfire	230
3.21.1	Regulatory Setting	230
3.21.2	Existing Environment	232
3.21.3	Impact Analysis.....	232
3.22	Mandatory Findings	235
3.22.1	Impact Analysis.....	235
4.0	DETERMINATION – RECOMMENDED ENVIRONMENTAL DOCUMENTATION.....	244
4.1	Summary	244

4.2	Recommendation Environmental Documentation	244
5.0	PREPARATION AND CONSULTATION	245
5.1	Preparers.....	245
5.2	Coordination and Consultation	245
6.0	REFERENCES.....	246

APPENDICES

- A. Aesthetics and Visual Impacts Analysis
- B. Air Quality Impact Assessment
- C. Cultural Resources Studies
- D. Energy Impact Assessment
- E. Soils and Geology Technical Memo
- F. Greenhouse Gas Impact Assessment
- G. Hazardous Materials Technical Memo
- H. Community Impact Assessment
- I. Noise and Vibration Impact Analysis
- J. Transportation/Traffic Impact Assessment

1.0 INTRODUCTION

1.1 Purpose of an Initial Study

The California Environmental Quality Act (CEQA) was enacted in 1970 to provide decision-makers and the public with information about the environmental effects of proposed projects, as well as avoidance and minimization measures. The Bureau of Engineering Environmental Management Group (EMG), on behalf of the City of Los Angeles (the City), which is serving as the CEQA Lead Agency, has determined the proposed All-Electric Bus Maintenance Facility Project (project) is subject to CEQA and no exemptions apply. Therefore, the preparation of an Initial Study (IS) is required.

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

This IS has been prepared pursuant to the CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the L.A. CEQA Thresholds Guide, 2006.

1.2 Document Format

This document is organized into seven sections and appendices, as follows:

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

Section 2, Project Description: describes the project location, project background, and project components. Standard Conditions, Project Design Features, and Mitigation Measures that would be implemented to ensure that potential adverse impacts of the proposed project would be reduced to a less than significant level are also identified in this section.

Section 3, Environmental Impact Analysis and Initial Study Checklist: provides a detailed discussion of the environmental factors that would be potentially affected by this project.

Section 4, Determination – Recommended Environmental Documentation: provides a summary of the environmental analysis and the recommended environmental documentation for the proposed project._.

Section 5, Preparation and Consultation: provides a list of key personnel involved in the preparation of this report and key personnel consulted; and

Section 6, References: provides a list of reference materials used during the preparation of this report.

Appendices: Technical studies prepared in support of this IS include the following:

- Aesthetics and Visual Impact Analysis
- Air Quality Impact Assessment
- Cultural Resources Studies
- Energy Analysis
- Soil and Geological Technical Memo
- Greenhouse Gas Analysis
- Hazardous Material Technical Memo
- Community Impact Assessment
- Noise and Vibration Analysis
- Transportation/Traffic Impact Assessment

1.3 CEQA Process

Upon selection of the preferred site for the EBMF, the City initiated the CEQA process through the preparation of this Initial Study and supporting technical memos. Public outreach was also conducted in the project area through an invitation to attend a virtual community meeting that was held on September 1, 2021, from 6:00 to 6:40 p.m. A total of 1,264 meeting flyers in English and Spanish and 23 electronic notices (e-blasts) were sent out to inform stakeholders, residents, and property owners within 0.25-mile of the project site. The meeting discussed the purpose and objectives of the project, the project timeline, and the ongoing environmental review, and it provided an opportunity to answer questions and obtain comments from participants, stakeholders, and other interested members of the public. Simultaneous Spanish translation was provided during the meeting.

The Los Angeles Council District 8 office was informed about the project in late August 2021, and regular briefings will be provided by LADOT and Los Angeles Bureau of Engineering (LABOE) on project progress. Native American tribes that are traditionally and culturally affiliated with the project area were also informed about the project at the start of the CEQA process and were provided an opportunity to consult, in compliance with Assembly Bill (AB) 52.

Upon completion of the Initial Study and technical memos and once the adoption of the MND has been proposed, a public comment period opens for no less than twenty (20) days, or thirty (30) days if there is state agency involvement. The 30-day public review and comment period for the EBMF IS/Draft MND has been set to start on September 16, 2022, and end on October 17, 2022. The purpose of this comment period is to provide public agencies and the general public an opportunity to review

the IS and comment on the adequacy of the analysis and the findings of the Lead Agency regarding potential environmental impacts of the proposed project. If a reviewer believes the project may have a significant effect on the environment, the reviewer should (1) identify the specific effect, (2) explain why it is believed the effect would occur, and (3) explain why it is believed the effect would be significant. Facts or expert opinions supported by facts should be provided as the basis of such comments.

A second virtual public meeting will be held on October 6, 2022, from 6:00 PM - 7:30 PM to discuss the project and the findings of the Initial Study.

After the close of the public review period, the Transportation Committee will consider the MND, together with any comments received during the public review process, and make a recommendation to the City Council on whether to approve the project. One or more Council committees may then review the proposal and documents and make their recommendation to the full City Council. The City Council is the decision-making body and considers the MND, together with any comments received during the public review process, in the final decision to approve or disapprove the project.

During the project approval process, persons and/or agencies may address either the Transportation Committee or the City Council regarding the project. Public notification of agenda items for the Transportation Committee, City Council committees, and City Council is posted 72 hours before the public meeting. The City Council agenda can be obtained by visiting the Council and Public Services Division of the Office of the City Clerk at City Hall, 200 North Spring Street, Suite 395; by calling (213) 978-1073, (213) 978-1137, or via the internet at: <https://clerk.lacity.org/calendar>

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

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

2.0 PROJECT DESCRIPTION

2.1 Project Location and Setting

2.1.1 Location

The City of Los Angeles is planning to build a new Electric Bus Maintenance Facility (EBMF or the proposed project) to support a larger and cleaner zero-emission bus fleet. The project would be implemented by the City of Los Angeles Department of Transportation (LADOT). LADOT has identified a two-parcel site of approximately 5.5 acres at 740-780 and 800 East 111th Place in South Los Angeles (APNs 6071-022-009 and 6071-022-013) as a potential site for this facility. The proposed site has been developed with two buildings that are being utilized as a logistics warehouse for solar panels. The proposed EBMF would eliminate the need to lease the existing South Los Angeles Bus Maintenance Facility at 14011 South Central Avenue in the City of Compton, which is located approximately 2 miles to the south.

The project site is situated within Council District 8 jurisdiction in the Southeast Los Angeles Community Planning Area of the City of Los Angeles (Figures 2-1 and 2-2). The project site is on the Inglewood 7.5-minute U.S. Geological Survey (USGS) quadrangle (California-Los Angeles County 7.5-minute topographic map series).

2.1.2 Setting

The project site is located between East 111th Place and East Lanzit Avenue, east of South Avalon Boulevard, and has relatively flat topography. Small clusters of light-industry land uses can be found near the project site along the railroad tracks, with adjacent land uses surrounding the project site comprised mostly of multi-family and single-family residences, but also encompassing land supporting other activities, including commercial, and community-oriented social services, such as education and health facilities. The area is largely urbanized and nearly completely built-out, with limited vacant land. There are no natural features or major land formations, surface water bodies, or waterways near the project site, except for Compton Creek, a concrete-lined drainage channel located approximately 0.2-mile north and 0.3-mile east of the project site.

Access to the site is provided by two driveways off East 111th Place, a street that is designated as a local collector with two lanes in each direction with on-street parking on each side. An existing Union Pacific Railroad (UPRR) rail line runs parallel to East Lanzit Avenue south of the project site. Imperial Highway and Interstate 105 (I-105) are located approximately three and seven blocks south of the project site, respectively.

Figure 2-3 presents an aerial view of the proposed site and its general vicinity.

Figure 2-1: Regional Map

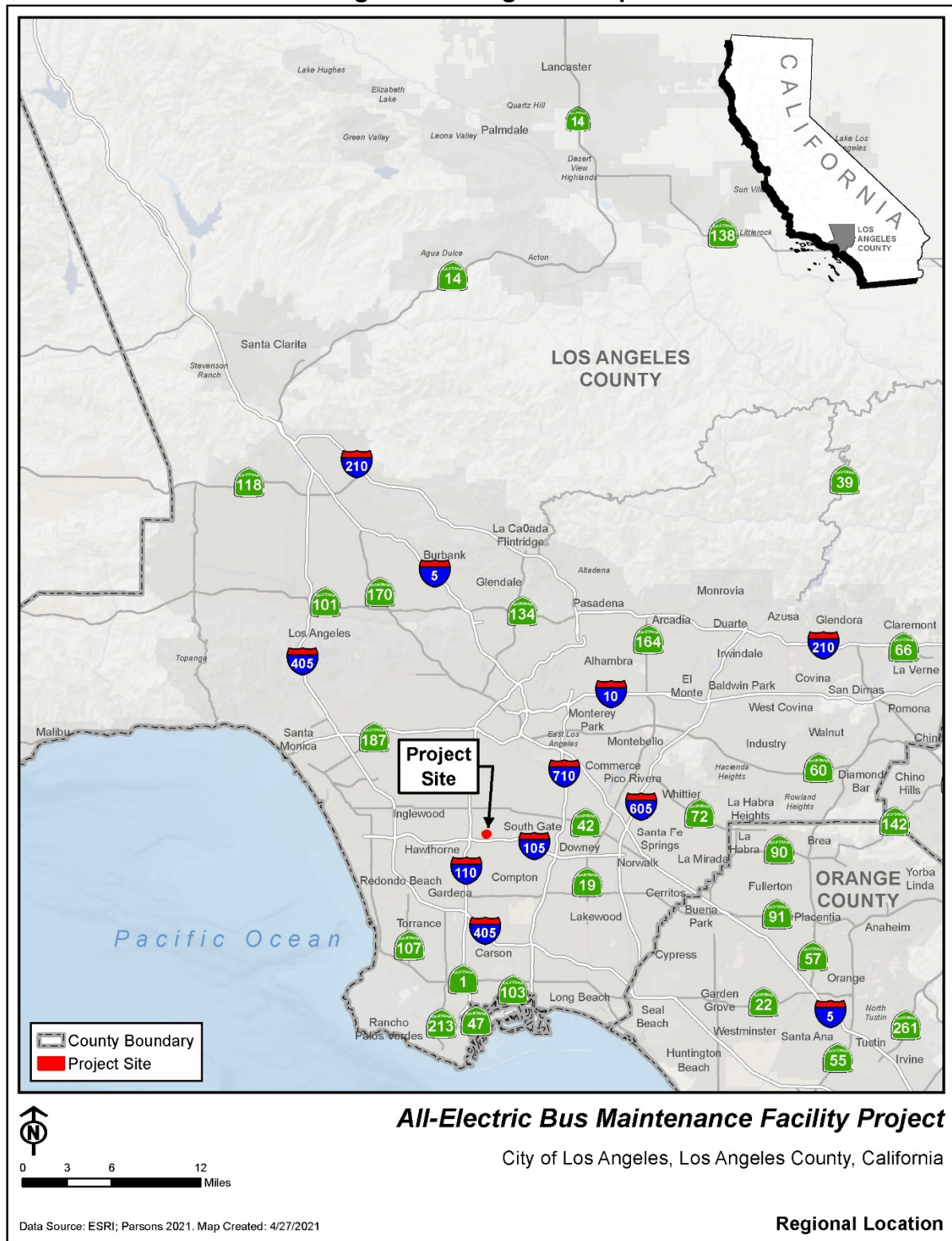


Figure 2-2: Project Location Map

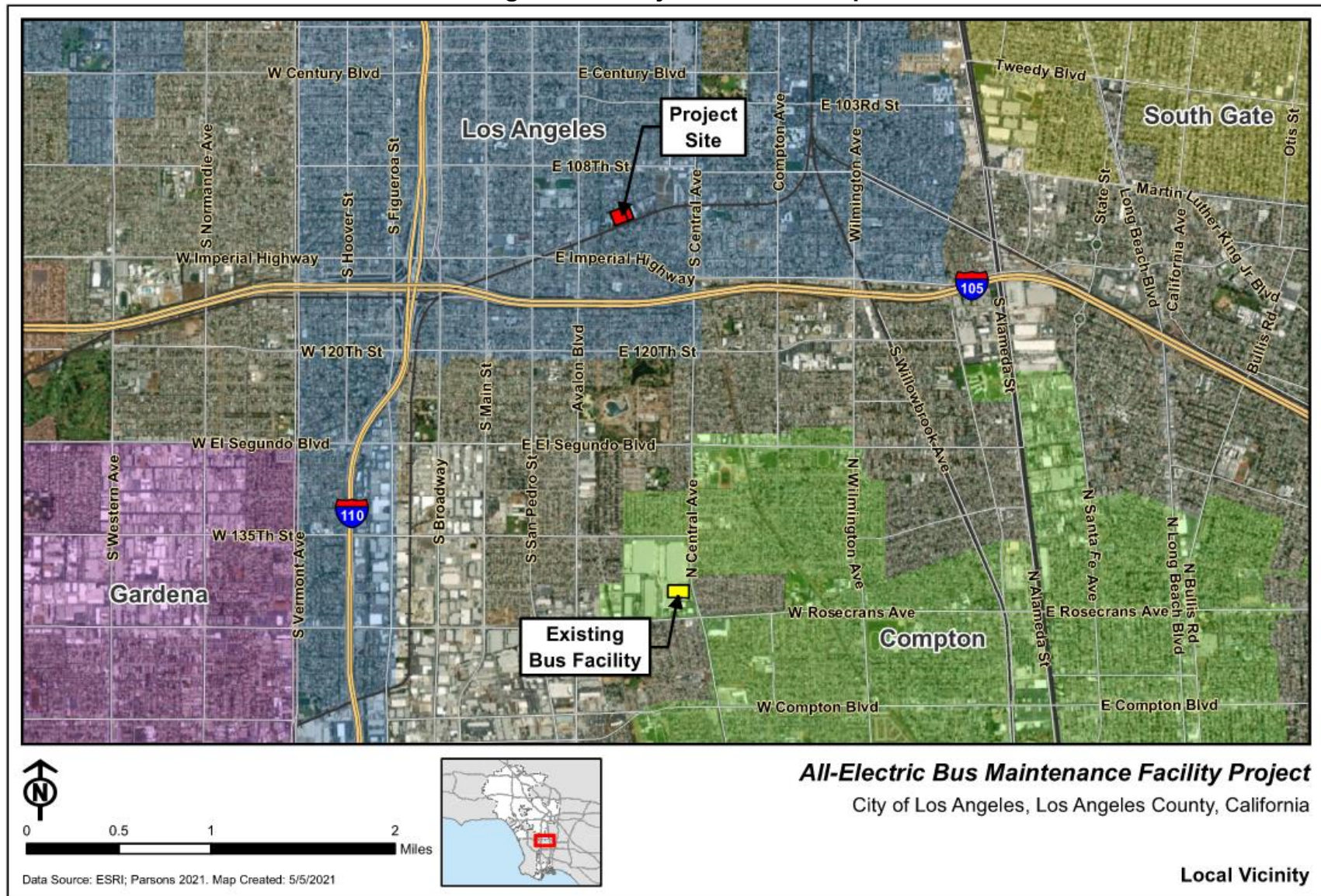


Figure 2-3: Aerial View of Project Site and its Immediate Vicinity



2.2 Project Objectives

In accordance with the California Air Resource Board (CARB) Innovative Clean Transit (ICT) regulation, the City has committed to the transition of its bus fleet to 100 percent zero-emissions buses by 2030, which is 10 years sooner than the ICT requirement.

LADOT currently operates and maintains some of its existing bus fleet at the South Los Angeles Bus Maintenance Facility located at 14011 South Central Avenue in the City of Compton (to be referred to as the Compton facility), about 2 miles to the south of the proposed EBMF site. This Compton facility is not owned by the City and is leased through LADOT's operations services contractor. The Compton facility does not have sufficient capacity to accommodate the additional maintenance and storage requirements of the proposed transition to electric buses and the expanded charging needs of an electric bus fleet.

The main goal of the proposed project is to build a modern maintenance facility to support a larger and cleaner zero-emission bus fleet. The project would enable LADOT to provide maintenance services, parking, charging, and inspection functions to approximately 130 Battery-Electric Buses (BEBs) to be used for the DASH and Commuter Express (CE) services provided by LADOT Transit. It would also be used to store and dispatch the electric buses for daily service. The proposed EBMF would eventually eliminate the need to use the Compton facility.

2.3 Project Description

In 2019, LADOT commissioned a study to assess the feasibility of constructing a new all-electric bus maintenance facility that will house up to 130 DASH and CE buses within the next 20 years. That study presented conceptual designs, cost estimates, and financial feasibility analysis that provided the specifications for the facility. The approximately 5.5-acre property covering two parcels of land on 740-780 and 800 East 111th Place has been identified as a potential site for the proposed maintenance facility.

The existing buildings on the site were previously used as a logistics warehouse and recycling center. They then remained vacant for two years but were recently leased for use as a logistics warehouse for solar panels. To use this property, a site clean-up and demolition of the existing buildings on site would be required before the construction of the buildings and structures needed for operation and maintenance of the LADOT bus fleet.

LADOT identified Concept A.2 from the 2019 Feasibility Report as the selected proposal to go forward for environmental analysis. The conceptual plan showing the first/ground level of the facility is shown in Figure 2-4 and the facility's second level in Figure 2-5. The material and construction of the buildings will reflect an industrial architectural design aesthetic consisting of exposed steel, masonry, and concrete, as shown in the conceptual site elevation in Figure 2-6.

Figure 2-4: Conceptual Ground Level Floor Plan



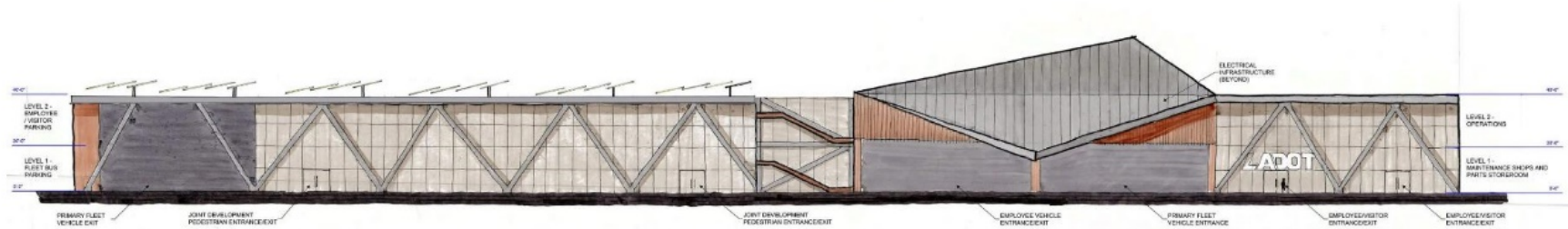
Source: Feasibility Study for an All-Electric Bus Facility, 2019.

Figure 2-5: Conceptual Second Level Floor Plan



Source: Feasibility Study for an All-Electric Bus Facility, 2019.

Figure 2-6: Conceptual Front Elevation



Source: Feasibility Study for an All-Electric Bus Facility, 2019.

2.3.1 Facility Components

Buildings and Structures

The new EBMF would be comprised of several buildings and structures, including a two-story operations and maintenance building to provide dispatch, parts storage, and administrative functions, 11 bus maintenance bays, a service building, a bus wash building, BEB parking/charging area, and a second-story parking deck for up to 360 employee/visitor vehicles, with the canopy above the parking deck topped with a 2000-kilowatt photo-voltaic (PV) system. Electrification equipment, including electrical transformers, switch cabinets, and bus chargers will also be included.

The new EBMF would provide preventative maintenance inspections, BEB charging, light maintenance and repair, emergency maintenance, interior vehicle cleaning, and exterior vehicle washing. It would also accommodate administrative and operations functions and would be used as a report base for bus operators. The facility would include space for employee parking, conference meeting rooms, operations and maintenance staff offices, dispatcher workstations, employee report and recreation rooms, and areas with lockers, showers, and restrooms for operators and maintenance personnel. Table 2-1 lists the main facility components.

Table 2-1: Proposed Electric Bus Maintenance Facility Components

Major Buildings/Areas	Size	Uses
Maintenance Building	35,912 SF	11 bus bays for repair/inspection; drive in/back out configuration
Operations Building (on 2nd level of Maintenance Building)	12,234 SF	Administration and Dispatch
Service Building	8,150 SF	Office and support areas; Storage areas; 3 service lanes; utility room
Bus Wash Building	4,120 SF	1 wash bay with drive-through configuration; equipment room; utility room
Bus Fleet Parking and Charging Area	Below parking deck	130 stacked spaces for DASH and Commuter Express buses
Employee/Visitor Parking Deck (360 Stalls on 2nd floor of bus parking)	196,560 SF	20 spaces for non-revenue fleet and 340 stalls for employees and visitors; stair enclosure; electrical infrastructure; lobby; offices; meeting areas
Canopy over Parking Deck	118,530 SF	2000 KW photo-voltaic capacity
SF = Square feet; KW = kilowatts Source: Feasibility Study for an All-Electric Bus Facility, 2019.		

Walls and Fences

The proposed facility would be fenced by a perimeter wall, which would include a minimum of 6-foot-high block walls on the eastern, southern, and western boundaries of the site and a combination block wall and steel mesh fence, with steel mesh gates, along the site frontage on East 111th Place (northern boundary).

Bus Fleet Composition

The proposed facility would accommodate a total of 130 BEBs, including 70 of the 30-foot-long DASH buses and 60 of the 45-foot-long CE buses.

2.3.2 Facility Operations

Transfer of Operations

LADOT is anticipating the delivery of 10 BEBs each month starting in July 2021 for approximately 13 months for a total of 130 BEBs. These BEBs would initially be parked at the existing Compton facility and other LADOT maintenance yards/parking areas.

Once the construction of the project is completed, the City would terminate the lease at the Compton facility through its contractor, and the current employees and BEBs would then be relocated to the new facility. The existing 95 propane and compressed natural gas (CNG) buses operating out of the Compton facility would be phased out and would not be transferred to the new facility.

Staffing

Approximately 312 employees would be working on-site and the facility would be open 24 hours per day, 7 days a week. Staff would be stationed at the site on 2 or 3 shifts, which would be staggered depending on their work responsibilities. Table 2-2 provides the staffing breakdown.

Table 2-2: Proposed Staffing

Work Responsibility	Staff	Number of Staff	Shift Schedule
Operations	Managers, Clerks, Supervisors, Receptionist, Bus Operators*, Dispatchers, and On-time Performance Monitors	258	3 AM to 11:30 AM 11 AM to 7:30 PM 7 PM to 3:00 AM or 5 AM to 1:30 PM 3:30 PM to 12 AM or 6 AM to 2:30 PM

Table 2-2: Proposed Staffing

Work Responsibility	Staff	Number of Staff	Shift Schedule
Fleet Maintenance	Maintenance Manager, Assistant Managers, Mechanics	33	3 AM to 11:30 AM 11 AM to 7:30 PM 7 PM to 3 AM
Parts Storeroom	Parts Manager and Clerks	3	3 AM to 11:30 AM 11 AM to 7:30 PM 7 PM to 3 AM
Service and Clean	Utility Workers	16	3 AM to 11:30 AM 11 AM to 7:30 PM 7 PM to 3 AM
Facility Maintenance	Facility Maintenance Staff	2	6 AM to 2:30 PM
	Total	312	
Note: * Bus operator schedules would depend on route assignments and the length of bus route times.			
Source: Feasibility Study for an All-Electric Bus Facility, 2019.			

Onsite Activities

The project would provide BEB servicing and inspection, washing and charging, interior cleaning, fare collection, and repair and maintenance 24 hours per day, 7 days a week. It is assumed that an average of six buses would be cleaned, washed, and/or provided preventive maintenance and repairs in a given hour. These maintenance activities would likely occur at night between 10:00 p.m. and 6:00 a.m.

The lithium iron-phosphate batteries for use by each BEB would require charging for a period of 2 to 3 hours on the combined charging system and 80-kilowatt alternative current (AC) charging system. A portion of the electrical consumption at the site would be provided by the 2000-kilowatt PV system to be installed on the canopy of the parking deck. With 38 BEBs charging simultaneously overnight, approximately 3,856 kilowatts would be used by 76 BEBs.

Bus Routes

The DASH buses provide frequent bus service in downtown Los Angeles (5 Downtown routes) and in 27 neighborhoods across the City (26 community routes). The CE buses provide 14 peak period service routes between downtown Los Angeles and major centers in the City and surrounding areas, with limited stops. As currently in operation, the DASH buses that would be stationed at the proposed facility would be serving Chesterfield Square, Pueblo del Rio, San Pedro, Southeast, Vermont/Main, Watts, and Wilmington areas. The CE buses would serve CE Routes 142, 430, 437, 438, 448, 534, and the Union Station/Bunker Hill shuttle.

No specific change in existing DASH and Commuter Bus routes and schedules is proposed with the use of the new facility. Therefore, based on the current bus schedules, the DASH and CE buses would be in service from 2.5 to 8 hours each day

and would have staggered departure and arrival times at the EBMF. It is anticipated that the majority of the BEBs would be leaving the facility from 4 a.m. to 8 a.m. and from 2 p.m. to 4 p.m. on weekdays and from 8 a.m. to 10 a.m. on weekends. The majority of the BEBs would also be returning from 8 a.m. to 10 a.m. and from 6 p.m. to 10 p.m. on weekdays and from 6 p.m. to 8 p.m. on weekends, with limited service on holidays.

Site Access

Buses coming to and leaving the proposed facility would largely use nearby South Avalon Boulevard (to the west of the site) to get to East 111th Place and the site. BEBs running easterly from Avalon Boulevard would enter the site through the western entrance driveway on East 111th Place and check in with the onsite security guard and proceed into the site to the southern section for service and washing. Otherwise, BEBs requiring repairs would park at the bus bays along the western section. Other BEBs may directly run in a counterclockwise direction toward the surface parking/charging spaces to be located in the central area of the site. BEBs would leave the site through the eastern exit driveway and run westerly on East 111th Place to Avalon Boulevard. Vehicles driven by facility employees, including bus operators, and visitors would enter and exit the facility through the center driveway (east of the bus entry driveway) that connects to a ramp leading to the second-level parking deck.

Parking

All buses assigned to the proposed facility, including the employee and visitor vehicles would be parked within the facility and would not use the on-street parking along the nearby existing streets. The parking/charging area for BEBs (at the center of the site) would include 130 stacked spaces and the second-story parking deck would provide 360 stalls for the facility's non-revenue fleet and employee and visitor vehicles.

Construction of the EBMF would require the construction of the new driveways, reconstruction of the sidewalks in front of the project site, and restriping of East 111th Place. This would result in a loss of some on-street parking slots on East 111th Place in front of the project site.

2.4 Project Schedule

The construction and operation schedule for the proposed project has not yet been finalized. For environmental analysis purposes, the potential timelines as shown in Table 2-3 have been assumed.

Table 2-3: Tentative Project Timeline

Activity Description	Start	Complete
Property acquisition	June 2021	March 2023

Table 2-3: Tentative Project Timeline

Activity Description	Start	Complete
Federal grant funding application and environmental review process pursuant to the federal requirement	January 2023	December 2023
Final design	March 2023	March 2024
Construction	June 2024	June 2026
Start of operation	July 2026	

2.4.1 Property Acquisition

The City is currently in negotiations with the property owner for the acquisition of the two parcels (APNs 6071-022-009 and 6071-022-013) and anticipates the Los Angeles City Council to approve project site acquisition in early 2023, after the completion of the CEQA documentation.

2.4.2 Funding

Funding for the project is anticipated to include funds from the City's Bus Facility Purchase Program, Federal Transit Administration's (FTA) Urbanized Area Formula Program Grants (49 U.S.C. Chapter 53, Sections 5307 & 5340), and other State and federal grant programs that may become available. Federal funding from the FTA would trigger a requirement to comply with the National Environmental Policy Act (NEPA), in addition to compliance with the CEQA. A separate NEPA document would be prepared as part of the grant funding application. It is assumed that the funding application and the NEPA review process would occur in 2023.

2.4.3 Construction

While the construction schedule for the proposed project has not yet been set, it is assumed that construction would be completed in 24 months following the final engineering design and bidding process in 2023. Any required soil remediation would be completed prior to the start of construction activities. Assuming no or limited remediation is necessary, project construction is tentatively scheduled to begin in mid-2024 and would be completed by mid-2026.

During the 24-month construction period, on-site activities would include:

- Mobilization
- Demolition and site clearing
- Excavation, grading, and paving
- Facility construction and equipment installation
- Finish work

Construction activities would be confined to the site, including equipment and material staging. However, roadway, sidewalk, and driveway improvements may require short-term sidewalk and lane closures. The maximum excavation depth for utility lines is

estimated at 8 feet and the maximum excavation depth for building foundations is estimated at 15 feet. No extensive backfill or grading is expected given the relatively flat topography of the site.

Finish work would include the installation of final facility features and interior furnishings, including charging equipment, trash receptacles, lighting, and signage. Parking area striping and final cleanup would also occur during this stage.

2.4.4 Operation

LADOT anticipates BEBs to utilize the proposed facility starting in mid-2026.

2.5 Mitigation Measures, Standard Conditions, and Project Design Features

Where it is determined that that project would generate potentially significant impacts, mitigation measures are recommended that would reduce the level of those potential impacts. The section summarizes the standard conditions (SCs), project design features (PDFs), and mitigation measures that would avoid or reduce the impacts of the project.

CEQA Guidelines, Section 15126.4(A), states “The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed...which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project.” This IS distinguishes between PDFs which are features incorporated into the design of the project to minimize or avoid adverse impacts, and SCs, which are existing regulations and conditions imposed by the City and other regulatory agencies. PDFs and SCs, as used herein, are defined more specifically as follows:

- Standard Conditions - SCs are existing requirements based on applicable federal, State, regional, and City regulations, and generally consists of regulatory compliance measures, and standard construction conditions and procedures. The SCs will be identified in the discussion, incorporated into the Mitigation Monitoring Program, and implemented as a part of the project to ensure compliance and that potential impacts would remain less than significant.
- Project Design Features - PDFs are specific design and/or operational measures proposed by, or agreed to by, the project applicant and are incorporated into the project to avoid or reduce its potential environmental effects. Because PDFs are incorporated into the project, they do not constitute mitigation measures. Even so, PDFs are incorporated into the Mitigation Monitoring Program to ensure that they are implemented as a part of the project.

When significant adverse impacts would occur after the implementation of PDFs and project compliance with SCs, mitigation measures have been developed to reduce project impacts to less than significant levels.

2.5.1 Summary of Standard Conditions, Project Design Features, and Mitigation Measures

This section summarizes the standard conditions, project design features, and mitigation measures to be implemented to minimize impacts as a result of project construction and implementation.

Aesthetics

- PDF-V-1:** The project shall be designed to provide vegetative screening along the east and west sides of the site to minimize the views into the proposed facility from the two community assets - Animo James B. Taylor Charter Middle School on the east and Kedren Health Community Center on the west.
- PDF-V-2:** The project shall be designed to set back the proposed building along East 111th Place to allow for landscaping along the street to soften the height of the building on the streetscape.
- PDF-V-3:** Where feasible, the project shall be designed to allow for vine plantings along the inside of the wall along the railroad tracks and provide vine portals to allow the vines to grow over the backside of the wall to minimize the surface area for graffiti.

Agriculture and Forestry

No impacts would occur and no mitigation is required.

Air Quality

- SC-AQ-1:** The construction and operation of the project shall comply with applicable California Air Resource Board (CARB) and South Coast Air Quality Management District (SCAQMD) Rules and Regulations, including but not limited to CARB ATCM 2485 and SCAQMD Rules 401 through 403 and 1403.

Biological Resources

- MM-BIO-1:** To avoid impacts to migratory birds, the vegetation removal, demolition, and site clearing activities shall occur during the non-breeding season (e.g., between September 1 and February 15). If such activities would have to be scheduled during this period, a qualified biologist shall conduct a preconstruction nesting bird survey to determine if any nesting birds are present within the site. This survey should be conducted no

more than 7 days before the start of vegetation removal. If nesting birds are found, an exclusionary buffer would be set up and clearly marked around each active nest site. Construction or clearing shall not be conducted within this zone until the qualified biologist determines that nesting birds have fledged or the nest is no longer active.

Cultural Resources

SC-CUL-1: In the event of the inadvertent discovery of human remains, the Contractor shall immediately notify the County Coroner and the City of Los Angeles. If the County Coroner determines the remains are Native American in origin, the Coroner shall contact the Native American Heritage Commission in accordance with Health and Safety Code (HSC) Section 7050.5 subdivision c, and Public Resources Code (PRC) Section 5097.98 (as amended by Assembly Bill 2641). The Native American Heritage Commission shall designate the most likely descendant (MLD) for the remains per PRC 5097.98. Under PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the MLD regarding their recommendations, if applicable. If the remains are determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the California HSC Section 7100 37 et seq. directing identification of the next-of-kin will apply.

SC-CUL-2: In compliance with Section 6.6-2 of the Greenbook (*Standard Specifications for Public Works Construction*) regarding archaeological and paleontological discoveries, if a discovery is made of items of archaeological or paleontological interest, the Contractor shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Engineer. When resumed, excavation operations within the area of discovery shall be as directed by the Engineer.

PDF-CUL-1: A qualified archeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall be retained before the project construction and shall remain on-call during all ground-disturbing activities. The qualified archaeologist shall ensure that a Worker Environmental Awareness Protection (WEAP) training, presented by the qualified archaeologist and Native American representative, is provided to all construction and managerial personnel involved with the project. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural resources and outline regulatory requirements for the protection of cultural resources. The WEAP shall also cover the proper procedures to be followed in the

event of an unanticipated cultural resource discovery during construction. The WEAP training can be in the form of a video or PowerPoint presentation or printed literature (handouts) that can be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

PDF-CUL-2: In the event of an inadvertent discovery of archaeological materials, the resource shall be fully documented by the qualified archaeologist or designee and a Department of Parks and Recreation (DPR) 523 record shall be prepared. If prehistoric or potential tribal cultural resources are identified, the consulting Native American Tribes shall be notified.

The qualified archaeologist, in consultation with consulting Native American Tribes and the City of Los Angeles, shall determine whether the resource is potentially significant as per CEQA (i.e., whether it is a historical resource, a unique archaeological resource, or tribal cultural resources). If preservation in place or avoidance is not feasible, the qualified archaeologist, in consultation with the City, shall prepare and implement a detailed treatment plan. Treatment of unique archaeological resources shall follow the applicable requirements of Public Resources Code (PRC) Section 21083.2. Treatment for most resources would consist of, but would not be limited to, in-field documentation, archival research, subsurface testing, excavation, and preparation of a final report and DPR 523 record. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of the final report and DPR 523 record(s) to the City of Los Angeles and South Central Coastal Information Center.

MM-PAL-1: A qualified paleontological monitor (i.e., one who meets the qualification standards established by the Society of Vertebrate Paleontology [SVP, 2010]) shall be retained prior to construction and shall remain on call during all ground disturbing activities. Worker Environmental Awareness Program (WEAP) training shall be provided to all construction and managerial personnel involved with the project's ground disturbing activities. The WEAP training shall provide an overview of paleontological resources and outline the regulatory requirements for their protection. The WEAP shall also cover the proper procedures to be followed in the event of a fossil discovery during construction. The WEAP training may be in the form of a video or PowerPoint presentation or printed literature (handouts) that can be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

MM-PAL-2: The qualified paleontological monitor will monitor project-related excavation activities in high paleontological deposits if encountered in

the subsurface. Project-related excavation activities greater than 5 feet depth shall be monitored on a part-time (i.e., spot-checking) basis to check for the presence of underlying paleontologically sensitive sediments. If paleontologically sensitive deposits are observed, full-time monitoring shall be implemented in those areas. Excavations determined to be entirely within previously disturbed sediments or late Holocene-age deposits do not require paleontological monitoring or continued spot-checking.

MM-PAL-3: In the unanticipated event that fossil resources are discovered, they shall be protected from further excavation, destruction, or removal. Work shall be halted within 25 feet of the discovery until it can be evaluated by a qualified paleontologist (i.e., one who meets the SVP professional standards for Principal Investigator or Project Paleontologist). If determined to be scientifically important, the paleontological resources shall be recovered, prepared to the point of curation, identified, and curated at the Natural History Museum of Los Angeles County or another accredited repository along with associated field data.

MM-PAL-4: After ground-disturbing activities are completed, a memo report documenting the methods and results of paleontological monitoring will be prepared by the qualified paleontologist and submitted to the City of Los Angeles.

Energy

Impacts would be less than significant and no mitigation is required.

Geology and Soils

SC-GEO-1: In accordance with the Los Angeles Municipal Code (LAMC) and Los Angeles Building Code (LABC), a geotechnical investigation shall be prepared to assess site-specific geologic conditions, including the potential for liquefaction, soil expansion, and other geologic hazards at the project site. Applicable standards in the LABC and the recommendations of the geotechnical investigation shall be incorporated into the design and construction of the project.

SC-GEO-2: The project plans and specifications shall be reviewed by a qualified Geotechnical Engineer to ensure proper implementation and application of the required building and seismic codes. Additionally, all grading, excavation, and earthwork activity should be performed under the observation and testing of a qualified Geotechnical Engineer during the following stages:

- Site grading
- Excavation activities
- Any other ground-disturbing activities

- When any unusual or unexpected geotechnical conditions are encountered.

Greenhouse Gas Emissions

Impacts would be less than significant and no mitigation is required.

Hazards and Hazardous Materials

- SC-HAZ-1:** All hazardous materials and wastes shall be handled and disposed of in accordance with applicable regulations, including South Coast Air Quality Management District (SCAQMD) Regulations.
- SC-HAZ-2:** Workers exposed to or handling contaminated soils shall have sufficient health and safety training, consistent with Occupational Safety and Health Administration (OSHA) Hazardous Waste Operation Standards (29 CFR 1910.120), and Cal-OSHA "Hazardous Waste Operations & Emergency Response" (HAZWOPER) (8 CCR 5192). The Contractor, qualified subcontractor, or an industrial hygienist shall prepare a site-specific health and safety plan. The plan shall appoint a site safety officer and establish responses to contaminants, including methane gas, known to exist in the area based on the site knowledge and the Phase II Environmental Site Assessment (ESA) and Additional Site Assessment Report.
- SC-HAZ-3:** Soils that have visible staining or an odor shall be tested in the field by the Contractor or qualified environmental subcontractor with an organic vapor analyzer (OVA) for volatile components, which require additional considerations in their handling and disposal. Soil with OVA readings exceeding 50 parts per million (ppm) volatile organic compounds (probe held 3 inches from the excavated soil face), or which is visibly stained or has a detectable petrochemical odor shall be stockpiled by the Contractor separately from non-contaminated soils. If volatile compounds are present at concentrations exceeding 50 ppm, the South Coast Air Quality Management District (SCAQMD) Rule 1166 permit will be required, which most likely will require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution.
- SC-HAZ-4:** Any contaminated material (i.e., soil, asphalt, concrete, railroad ballast, trash fill, or debris) that is to be hauled off the site is considered a "waste product" and must be classified as hazardous or non-hazardous waste under all criteria by both State and Federal Codes before disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest will be prepared by the Contractor or its qualified representative, and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels

that can be returned to the excavation or is not needed on the site, a less costly nonhazardous transporter and soil recycling facility shall be used if no hazardous constituents are present above their respective action levels.

SC-HAZ-5: In accordance with South Coast Air Quality Management District (SCAQMD) Rule 1403, a pre-demolition building survey for asbestos-containing materials (ACMs) is required before demolition. Therefore, a pre-demolition survey is recommended for ACMs, lead-based paint, polychlorinated biphenyl (PCB), and other hazardous materials before any on-site demolition.

MM-HAZ-1: Additional site characterization to identify the lateral and vertical extents of tetrachloroethene (PCE) impacted soil vapor and assess if groundwater beneath the site has been impacted shall be conducted. Following completion of site characterization, the City of Los Angeles shall report the “unauthorized release” to the appropriate agency for regulatory oversight. Once a case is opened, the City of Los Angeles shall comply with any additional characterization activities and subsequent remedial actions to the satisfaction of the regulatory oversight agency to protect construction workers, facility workers, and neighboring residences from exposure to impacted media (i.e., soil, groundwater, and/or soil vapor).

MM-HAZ-2: Before construction, a Soil Management Plan (SMP) shall be developed to provide construction workers with guidelines from a health and safety perspective (e.g., use of personal protective equipment, action levels, etc.) on handling impacted media that is encountered during any subsurface disturbance activities. The SMP shall describe site- and project-specific protocol to be followed in the event of encountering chemically impacted soil. The SMP shall also facilitate excavation activities by having a structured plan in place for the handling, characterization, and disposal of impacted soil wastes.

MM-HAZ-3: Additional measures, as recommended in the Phase II Environmental Site Assessment (ESA) and/or the additional Site Characterization to be performed for the project site, shall be taken to protect the proposed facility's workers. These measures may include, but are not limited to:

- All stored chemicals, equipment, underground storage tanks (USTs), and waste/debris shall be removed from both properties before purchase. Once removed, a pre-acquisition inspection should be performed to confirm the removal of all hazardous materials and other solid and liquid wastes stored on the properties.
- Due to the contaminant plume potentially extending offsite, consultation with legal counsel is needed to determine if notification to the Los Angeles Regional Water Quality Control Board (LARWQCB) of the potential unauthorized release is warranted.

Should a case be opened with the LARWQCB, additional action may likely be required, including detailed site characterization, active remediation, and the designation of a responsible party.

- Measures (i.e., engineering controls such as vapor barriers) shall be installed within new construction, to address residual impacts of tetrachloroethene (PCE) in soil vapor in the event remediation is not pursued or completed. These measures typically consist of the installation of either an active or passive venting system and/or the application of a vapor barrier that is chemically resistant to chlorinated solvents.

Hydrology and Water Quality

SC-HYD-1: In compliance with National Pollutant Discharge Elimination System (NPDES) No. CAS000002, the Contractor shall obtain coverage under the NPDES Construction General Permit and implement a Stormwater Pollution Prevention Plan (SWPPP) during construction activities. The SWPPP shall include appropriate Best Management Practices (BMPs) from the City's Reference Guide for Stormwater Best Management Practices. In addition, the Contractor shall comply with Order No. 2003-003-DWQ, including the terms and conditions of the general Waste Discharge Requirements of this order. Any groundwater extracted during excavation activities will be disposed of in accordance with the General Waste Discharge Requirements for discharges to land with a low threat to water quality.

SC-HYD-2: In compliance with National Pollutant Discharge Elimination System (NPDES) No. CAS000001, the City shall obtain coverage under the NPDES General Industrial Activity Storm Water Permit and implement a Stormwater Pollution Prevention Plan (SWPPP) during project operations. In addition, the on-site storm drainage shall be designed in compliance with LAMC Section 64.30 for requirements on the disposal of industrial wastewater and with the City's Low-Impact Development Ordinance for permanent site Best Management Practices (BMPs) that would allow the beneficial use of rainwater and urban runoff; reduce stormwater/urban runoff while improving water quality; promote rainwater harvesting; reduce off-site runoff and provide increased groundwater recharge; and reduce erosion and hydrologic impacts downstream.

Land Use and Planning and Community Impacts

SC-LU-1: The proposed project shall be designed and constructed in compliance with applicable design guidelines and development standards in the Southeast Los Angeles Community Plan, Southeast Los Angeles Community Plan Implementation Overlay (CPIO) District, and the City's Zoning Regulations.

- SC-CC-1:** In compliance with Section 601-1 of the Greenbook (*Standard Specifications for Public Works Construction*), the Contractor shall prepare a Transportation Management Plan (TMP) in consultation with the City of Los Angeles before construction. The TMP will be submitted with the construction plans and schedule to the Los Angeles Police and Fire Departments before the commencement of construction activities. The TMP will outline necessary street/lane closures and detours. In addition, detours around construction areas will be identified for bicyclists and pedestrians. Signs will be posted to direct bicyclists and pedestrians to sidewalks and intersections where they may safely cross. A restriction on large-size trucks shall also be imposed to confine travel to and from the construction site during off-peak commute times.
- SC-CC-2:** In compliance with Section 600 of the Greenbook (*Standard Specifications for Public Works Construction*), roadway and driveway access for adjacent land uses shall be maintained at all times during construction, and work shall be scheduled to avoid unnecessary inconvenience to residents, students, and users of abutting properties. Undue delays in construction activities shall be avoided to reduce the public's exposure to construction-related impacts.
- SC-CC-3:** In compliance with Section 5-7, Safety, of the Brownbook (*Additions and Amendments to the 2021 Edition of the Standard Specifications for Public Works Construction*), the contractor shall provide all safety measures necessary to protect the public and workers within the Work area. Particular attention is directed to the possibility of children playing or going to or from school in the Work area. The Contractor shall take all necessary precautions to ensure that its operations will not create a safety hazard for children. Crossing guards shall be placed at the project site driveways and the intersections of East 111th Place with McKinley Avenue and Stanford Avenue, leading to the nearby schools, when construction activities (e.g., sidewalk improvements and haul truck traffic) occur during school start and end times.
- SC-CC-4:** In compliance with the City of Los Angeles Building Regulations Ordinance No. 178,048 (LAMC Section 91.106.4.8), a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. A public liaison shall be appointed for project construction and shall be responsible for addressing public concerns about construction activities, including, but not limited to, access, excessive noise, dust, or odor. As needed, the liaison shall determine the cause of the concern (e.g., starting too early,

bad muffler, blocked driveway) and implement measures, in consultation with the Contractor, to address the concern. Notices detailing the dates and hours of construction shall be sent to properties within 500 feet of the construction site. A project information sign shall be posted at the construction site and shall display the telephone number for the public liaison.

Mineral Resources

Impacts would be less than significant and no mitigation is required.

Noise

MM-NOI-1: To minimize noise impacts to area residents during project construction, the Contractor shall install a temporary noise barrier, which includes noise barrier fences, moveable noise barriers, and/or noise control curtains, with an effective height of 12 feet around the perimeter of the construction site. Temporary noise barriers may be made, for example, of concrete jersey barriers with 0.75-inch plywood attached to fence posts, or the noise control curtain material may be mounted or hung over perimeter chain-link fences.

Population and Housing

Impacts would be less than significant and no mitigation is required.

Public Services

SC-PS-1: The project shall be designed, constructed, and operated in accordance with the Los Angeles Fire Code and other applicable requirements in the Los Angeles Municipal Code (LAMC), Los Angeles Building Code (LABC), and other State and City regulations to prevent the creation of fire hazards, to reduce the potential for property damage and personal injury in the event of a fire, and to facilitate evacuation and emergency response.

Recreation

No impacts were identified and no mitigation is required.

Transportation

SC-TR-1: The proposed project shall be designed in accordance with City of Los Angeles standards for streets, sidewalks, driveways, and other street improvements to prevent the creation of traffic hazards.

PDF-TR-1: The proposed project shall quantify the operational performance for primary site access points, unsignalized intersections integral to the

project's site access, and signalized intersections in the vicinity of the project site after the project is fully operational. If it is determined that the project exceeds the travel volume screening criteria for Boulevards and Avenues as defined in the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG), further analysis is required to estimate the travel delay at each major signalized intersection where the capacity would be altered by the projects and to estimate how the project would be expected to improve or reduce safety for vulnerable road users. Potential corrective actions for the project access and circulation constraints could include:

- Provide an additional left-turn lane pocket for the westbound approach at the S. Avalon Blvd. and E. 111th Place intersection.
- Improving the segment of E. 111th Place from the eastern end of the site frontage to Avalon Boulevard to two lanes each direction to provide additional roadway capacity.
- Transportation Demand Management (TDM) Strategies that reduce trips above and beyond those required in Section 2.2 of the LADOT TAG.
- Installation of a traffic signal or stop signs or electronic warning devices at site access points.
- Redesign and/or relocation of project access points.
- Redesign of the internal access and circulation system.
- Installation of stop signs and pavement markings internal to the site.
- Restrict or prohibit turns at site access points.
- Repurpose existing curb space to better accommodate passenger loading.
- New traffic signal installation, left-turn signal phasing, or other vehicle flow enhancements (e.g., Automated Traffic Surveillance and Control [ATSAC] system upgrades) at nearby intersections.
- Intersection reconfiguration that reduces gridlock and unsafe conflict points.
- Provide continuous paved sidewalks, walkways, or shared-use paths to off-site pedestrians and bicyclists to adjacent or nearby transit facilities.
- Fair share contribution to planned LADOT capital project that accomplishes one or more of the above.

Tribal Cultural Resources

MM-TCR-1: Due to the potential for tribal cultural resources to exist on the project site, prior to the commencement of any ground-disturbing activity at the project site, the City of Los Angeles (the City) shall retain a tribal monitor that is qualified to identify, record, and evaluate the significance of any archaeological and/or tribal cultural finds during construction. The qualified tribal monitor shall be from or approved by the Gabrieleño Band

of Mission Indians – Kizh Nation (the Tribe). Ground-disturbing activities shall include removing pavement, potholing, auguring, grubbing, removing trees, boring, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or similar activity at the project site. The executed monitoring service agreement shall be submitted by the qualified tribal monitor to the City prior to any ground-disturbing activity. The qualified tribal monitor will complete logs describing each day's construction activities, locations, soil, and any cultural materials, human remains, and/or burial goods discovered. Tribal monitoring shall conclude when ground-disturbing activities on the project site have been completed, or when the qualified tribal monitor indicates any additional construction activity at the project site has little or no potential to impact tribal cultural resources. In accordance with PDF-CUL-1, prior to commencing any ground disturbing activities, the qualified archaeologist and the qualified tribal monitor shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground-disturbing activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground-disturbing activities. In addition, workers will be shown examples of the types of resources that would require notification to the archaeological monitor and tribal monitor.

Upon discovery of any subsurface object or artifact that may be a tribal cultural resource during the course of any ground-disturbing activity, procedures to ensure that tribal cultural resources are not damaged include but are not limited to the following steps:

- All such ground-disturbing activities shall cease in the immediate vicinity of the discovery, the radius of which will be determined by the qualified tribal monitor or the qualified archaeological monitor, until the qualified tribal monitor has evaluated the find in accordance with federal, state, and local guidelines.
- The found deposits shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribe and the tribal monitor, and in accordance with federal, state, and local guidelines.
- Personnel of the project shall not collect or move any archaeological or tribal resources or associated materials or publish the location of tribal cultural resources.
- If the resources are Native American in origin, the tribal monitor will make recommendations to the City regarding the monitoring of future ground-disturbing activities, as well as the treatment and disposition of any discovered tribal cultural resources, which may include but not limited to the preservation in place or recovery and retention of them

in the form and/or manner which the tribal monitor and the Tribe deem appropriate for educational, cultural, and/or historic purposes. Until a recommendation is made, the discovery should be preserved in place or left in an undisturbed state. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur unless testing or studies already completed have adequately recovered the scientifically consequential information form and about the resource and this determination is documented by a qualified archaeologist or tribal monitor.

- The City shall implement the tribal monitor and Tribe's recommendations if the City can reasonably conclude that the recommendations are reasonable and feasible to mitigate or avoid any significant impacts to the identified tribal cultural resources. If the City does not accept a particular recommendation determined to be reasonable and feasible by the qualified tribal monitor, the City may request mediation by a mediator agreed to by the tribal monitor, the Tribe, and the City who has the requisite professional qualifications and experience to mediate such a dispute. The City shall pay any costs associated with the mediation. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources.
- The ground-disturbing activities may recommence outside of a specified radius of the discovery site, so long as this radius has been cleared by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
- The location of the find of tribal cultural resources and the type and nature of the find will not be published beyond providing it to public agencies with jurisdiction or responsibilities related to the resources, the qualified archaeologist, qualified tribal monitor, and the Tribe.
- If the resources consist of non-Native American historic archaeological materials, a qualified archaeologist will apply National Register of Historic Places Criterion D to determine their significance. Artifacts will be curated per the Code of Federal Regulations 36 Part 79, as applicable, or be offered to a local historical society museum or educational facility, as deemed appropriate by the City.

SC-CUL-1 shall be implemented should human remains be inadvertently discovered at the project site. If the Gabrieleño Band of Mission Indians – Kizh Nation is designated Most Likely Descendant

(MLD) by the Native American Heritage Commission (NAHC), the Koonas-gna Burial Policy shall be implemented. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be prepared by the MLD. Associated funerary objects reasonably believed to have been placed with individual human remains either at the time of death or later and made exclusively for burial purposes are to be treated with utmost respect and dignity. The prepared soil and cremation soils are to be treated in the same manner as intact bone fragments. Cremations will either be removed in bulk or by means necessary to ensure the complete recovery of all sacred materials.

In such cases where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate which can only be moved by heavy equipment. If this type of steel plate is unavailable, a 24-hour guard should be posted outside of working hours. The City will make every effort to divert project activities and keep the remains in situ and protected. If the project cannot be diverted, it may be determined that the burials will be removed. The MLD will work closely with the City's designated qualified archaeologist and tribal monitor to ensure that the excavation is treated carefully, ethically, and respectfully. Each occurrence of human remains and associated funerary objects, sacred objects, and objects of cultural patrimony will be retained and reburied within six months of recovery in a secure container. If preservation in place is not possible despite good faith efforts, a site located within the project parcel footprint, as agreed to by the City and the Tribe, and to be protected in perpetuity, shall be designated for the respectful reburial of the human remains and/or ceremonial objects. There shall be no publicity regarding any cultural materials recovered.

Any data recovery plans shall require approval by the Tribe; such documentation will include detailed descriptive notes and sketches, at a minimum. Additional documentation as outlined in a treatment plan should also be approved by the Tribe. If additional data recovery is conducted, a final report will be submitted to the Tribe, Native American Heritage Commission, and South Central Coastal Information Center. No invasive and/or destructive diagnostics on human remains shall be conducted.

Utilities and Service Systems

- SC-CF-1:** Before starting construction, the City of Los Angeles will notify and coordinate with affected utility providers to avoid service interruptions during peak periods or provide temporary backup services for interruptions during peak periods, as well as notify customers of scheduled service interruptions.

Wildfire

No impacts would occur and no mitigation is required.

Cumulative Impacts

MM-CUM-1: The construction schedules of other projects in the vicinity should be coordinated with one another through communication among City departments and staff so as to avoid cumulatively affecting vehicle traffic, pedestrians, and bicyclists on Avalon Boulevard and East 111th Place.

Summary Findings

With project compliance with Standard Conditions and the implementation of the Project Design Features and Mitigation Measures listed above, project impacts would be less than significant.

In addition to the above measures, the analysis in this document assumes that, unless otherwise stated, the project would be designed, constructed, and operated following all applicable laws, regulations, ordinances, and formally adopted City standards, including but not limited to:

- City of Los Angeles, City Council. Municipal Code. [LAMC] Available online at https://codelibrary.amlegal.com/codes/los_angeles/latest/overview
- City of Los Angeles, Department of Public Works, Bureau of Engineering. Standard Plans. [Standard Plans] Available online at <https://eng2.lacity.org/techdocs/stdplans/index.htm>
- American Public Works Association. Standard Specifications for Public Works Construction. [Green Book]
- American Public Works Association. Work Area Traffic Control Handbook. [WATCH]
- City of Los Angeles, Department of Public Works, Bureau of Engineering. City's Additions and Amendments to the Green Book. [Brown Book] Available online at <https://eng2.lacity.org/brownbook/frame.cfm>
- City of Los Angeles, Department of Public Works, Bureau of Engineering. Part M, Construction. [Construction Manual] Available online at <https://eng2.lacity.org/techdocs/cons-man/>
- City of Los Angeles, Southeast Los Angeles Community Plan. Available online at https://planning.lacity.org/odocument/2953d47a-2fa6-4774-9853-d2fe5c46d9bd/Southeast_Community_Plan.pdf
- City of Los Angeles, Southeast Los Angeles Community Plan Implementation Overlay District [Ordinance 185925]. Available online at <https://planning.lacity.org/plans-policies/overlays/southeast-los-angeles>

3.0 ENVIRONMENTAL IMPACT ANALYSIS AND INITIAL STUDY CHECKLIST

This section documents the screening process used to identify and focus upon environmental impacts that could result from the proposed project. The IS Checklist below closely follows Appendix G of the State CEQA Guidelines, as prepared by the Governor's Office of Planning and Research, and was used in conjunction with the City's 2006 L.A. CEQA Thresholds Guide and other sources to screen and focus on the potential environmental impacts resulting from the project.

3.1 Analysis Section Format

Each topical analysis section is organized and defined as provided below.

3.1.1 IS Checklist

The IS Checklist closely follows Appendix G of the State CEQA Guidelines and is presented as a table of the questions used to screen and focus on the potential environmental impacts resulting from the project.

3.1.2 Environmental Conditions

The environmental conditions provide an overview of the existing conditions and define the baseline relevant to the scope of the environmental topic. The environmental conditions include regulatory setting and existing environment as defined in the following:

Regulatory Setting

The regulatory setting provides information about policies, procedures, regulations, and requirements that were in effect at the time that the decision was made by the project applicant to undergo environmental review.

Existing Environment

The existing environment discussion describes the applicable physical conditions at the project site and surrounding area and may include information related to existing land uses, structures, and operational characteristics of the existing developments.

3.1.3 Environmental Impact Analysis

The impact analysis discussion responds to the questions listed in the IS Checklist for each environmental resource and discusses the potential impacts of the project. The section may discuss the methods, procedures, and techniques used to estimate the project impacts. The section identifies and explains the thresholds of significance and any additional criteria used to determine the significance of the project impacts. Impacts are separated into the following categories:

- **No Impact.** This category applies when the project would not create an impact in the specific environmental issue area. A “No Impact” finding does not require an explanation when the finding is adequately supported by the cited information sources (e.g., exposure to a tsunami is not a risk for projects not near the coast). A finding of “No Impact” is explained where the finding is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- **Less Than Significant Impact.** This category is used when the project would result in impacts below the threshold of significance and would therefore have less than significant impacts.
- **Less Than Significant Impact with Mitigation Incorporated.** This category applies where the incorporation of mitigation measures would reduce a project’s “Potentially Significant Impact” to a “Less Than Significant Impact.” The mitigation measures are described briefly along with a brief explanation of how they would reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be incorporated by reference.
- **Potentially Significant Impact.** This category is applicable if there is substantial evidence that a significant adverse effect might occur, and no feasible mitigation measures could be identified to reduce impacts to a less than significant level. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.

Sources of information that adequately support these findings are referenced with each question. All sources are available for review at the offices of the City of Los Angeles Bureau of Engineering, 1149 South Broadway, Suite 600, Los Angeles, California 90015. Please contact Lauren Rhodes at lauren.rhodes@lacity.org for an appointment.

3.2 Aesthetics

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

A Visual Impacts Assessment Technical Memorandum (Parsons, 2022) was prepared for the project and is provided in Appendix A. The findings of the study are summarized below.

3.2.1 Regulatory Setting

This section describes existing laws and regulations related to visual quality and aesthetics that apply to the project.

3.2.1.1 Federal

There are no federal regulations that specifically address impacts related to aesthetics although the National Scenic Byways Program designates roads with one or more archeological, cultural, historic, natural, recreational, and scenic qualities as All-American Roads or National Scenic Byways. There are no All-American Roads or National Scenic Byways within five miles of the site.

3.2.1.2 State

There are no state regulations that specifically address impacts related to aesthetics although California's Scenic Highway Program was created to protect and enhance

the natural scenic beauty of California highways and adjacent corridors. There are no officially designated or eligible State Scenic Highways within 10 miles of the project site.

3.2.1.3 Local

City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element establishes the broad overall policy and direction for the entire General Plan. The Framework Element states that scenic resources are intended to improve community and neighborhood livability in the City. The Framework Element's open space and conservation policies seek to conserve significant resources and use open space to enhance community and neighborhood character in the City.

City of Los Angeles General Plan Conservation Element

The City's General Plan Conservation Element includes a discussion of the existing landforms and scenic vistas in the City. Objectives, policies, and programs included in this element are intended to ensure the protection of the natural terrain and landforms, unique site features, scenic highways, and panoramic public views as City staff and decision-makers consider future land use development and infrastructure projects.

City of Los Angeles General Plan Mobility Plan

The City's General Plan Mobility Element or Mobility Plan 2035 provides an inventory of City-designated scenic highways and includes special controls for the protection and enhancement of scenic resources. The Mobility Plan 2035 includes Scenic Highway Guidelines for those designated scenic highways for which there is no adopted scenic corridor plan. There is no City Scenic Highway on or near the site. There is also no streetscape plan or scenic corridor plan that encompasses the site or surrounding streets.

Southeast Los Angeles Community Plan

The Southeast Los Angeles Community Plan serves as the Land Use Element of the City's General Plan and articulates the vision for long-term physical and economic development and community enhancement of the Southeast Los Angeles community. This Community Plan includes goals and policies addressing land use and urban design, mobility, community facilities, and infrastructure issues in the community, with the intent of encouraging responsible development that would enhance the quality of life for residents; create healthy and sustainable neighborhoods; and promote business development that serves the needs of the community.

Southeast Los Angeles Community Plan Implementation Overlay

The Southeast Los Angeles Community Plan Implementation Overlay (CPIO) District implements the goals and policies of the Southeast Los Angeles Community Plan and contains supplemental development regulations. The project site is located within this CPIO and is part of Subarea K – Compatible Industrial. This subarea applies to industrial uses located adjacent to residential neighborhoods and allows light industrial and commercial uses, while restricting noxious and other incompatible uses. One of

the purposes of the CPIO is to protect residential uses from adjacent industrial uses through appropriate screening, buffering, and use compatibility. Subarea K seeks to preserve and revitalize industrial land in the Southeast Los Angeles community and improve the aesthetics of industrial buildings and the quality of life for neighborhoods next to industrial uses.

Community facilities, warehouse and storage buildings, and auto-related uses are allowed in Subarea K. The CPIO also includes development standards for building height, density/floor area ratio, building disposition, building design, parking, signs, equipment, fencing and walls, utilities, lighting, and open storage, in addition to the zoning regulations in the LAMC.

Zoning Regulations

The site is zoned M1-1-CPIO (Limited Industrial-Height District 1-CPIO). Section 12.17.6 of the LAMC contains the development standards for the M1 zone. The standards include permitted uses, restrictions, and required lot areas, yard widths, and loading space. Requirements for off-street parking, building heights, landscaping, signs, and other overlay zones and building regulations are also outlined in the LAMC.

3.2.2 Existing Environment

The existing visual character of the site is typical for an older industrial/warehouse site with large, metal-sheathed, or concrete warehouse-type structures, and large paved areas with little buffering or landscaping. Given the type of structures on the site, the structures' ages are apparent and the graffiti and other maintenance issues can be seen. Figure 3.2-1 is the photograph of the existing buildings at the project site as viewed from East 111th Place looking west. Figure 3.2-2 shows the existing backside of the site, along the railroad tracks, from East Lanzit Avenue.

The existing buildings reflect the industrial nature of warehouses from the 1950s. In addition, the existing perimeter fencing is an open iron rail picket fence allowing views into the site from the adjacent East 111th Place and the residential units that face the site (at least where the existing buildings do not fall along the edge of the property). Similar to the north side of the site, the south side along East Lanzit Avenue and the UPRR tracks has a similar fence along the edge of the site (between the site and the UPRR tracks) with an additional existing chain-link fence along the outside edge of the UPRR tracks (between the tracks and East Lanzit Avenue).

Figure 3.2-1: Existing Views of the project site from East 111th Place



Looking West



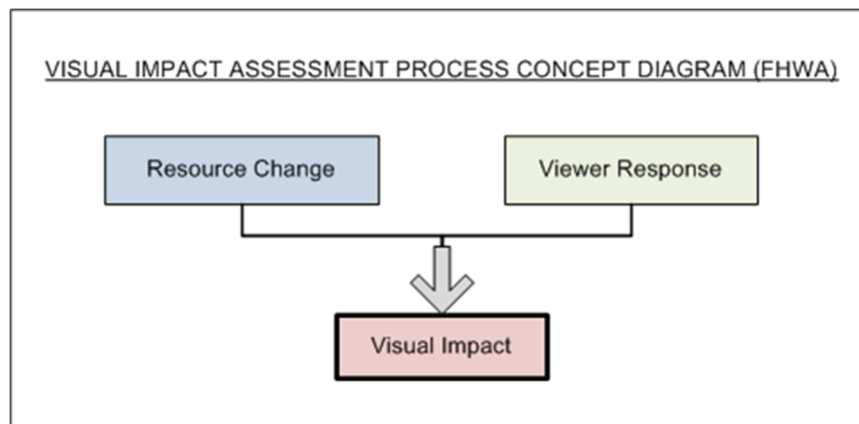
Looking East

Figure 3.2-2: Existing View of the project site from East Lanzit Avenue



3.2.3 Visual Impact Analysis

The analysis of the project's visual impacts generally follows the guidance outlined in the *Visual Impact Assessment for Highway Projects*, as published by the Federal Highway Administration (FHWA). The methodology includes the analysis of the resource change and the viewer response, as shown in the following diagram.



3.2.3.1 Viewer Response Analysis

Viewer Groups

The population affected by the project could also be called viewers of the project. Viewers are people whose views of the landscape may be altered by the proposed project—either because the landscape itself has changed or their perception of the landscape has changed. Viewers, or more specifically the response viewers have to changes in their visual environment, are one of two variables that determine the extent of visual impacts that will be caused by the construction and operation of the proposed project.

In evaluating viewer response to visual resource changes, based on the existing and proposed visual character of the site, two viewer groups were identified, including:

- **Neighbors:** Neighbors are people who have views of the site from their home or office and therefore have longer-term views of the site for a typical day. They can be subdivided into different viewer groups by land use. For example, residential, commercial, industrial, retail, institutional, civic, or educational, land uses may include neighbors or viewer groups with distinct reasons for being around the project site and therefore having distinct responses to changes in visual resources. For this project, this group of viewers includes community residents and business/facility owners, employees, and customers.
- **Roadway users:** Roadway users are people who have views from the road. This group is divided into two categories – automobile drivers, which would also include delivery or other roadway drivers, pedestrians, and bicyclists. This division is due in large part to the speed of travel along the roadways. For this project, this group of viewers includes automobile drivers/riders and pedestrians/ and bicyclists.

Viewer Response

Viewer response is a measure or prediction of the viewer's reaction to changes in the visual environment and has two dimensions, viewer exposure, and viewer sensitivity.

Viewer exposure is a measure of the viewer's ability to see a particular object. Viewer exposure has three attributes: location, quantity, and duration. Location relates to the position of the viewer in relationship to the object being viewed. The closer the viewer is to the object, the more exposure. Quantity refers to how many people see the object. The more people who can see an object or the greater frequency an object is seen, the more exposure the object has to viewers. Duration refers to how long a viewer can keep an object in view. The longer an object can be kept in view, the more exposure. High viewer exposure helps predict that viewers will have a response to a visual change.

Viewer sensitivity is a measure of the viewer's recognition of a particular object. It has three attributes: activity, awareness, and local values. Activity relates to the preoccupation of viewers—are they preoccupied, thinking of something else, or are they truly engaged in observing their surroundings? The more they are observing their surroundings, the more sensitivity viewers will have of changes to visual resources.

Awareness relates to the focus of view—the focus is wide and the view general or the focus is narrow and the view specific. The more specific the awareness, the more sensitive a viewer is to change. Local values and attitudes also affect viewer sensitivity. If the viewer group values aesthetics in general or if a specific visual resource has been protected by local, state, or national designation, viewers will likely be more sensitive to visible changes.

Viewer Sensitivity

Community residents in the vicinity of the proposed facility are considered highly sensitive to changes in their visual environment because they have long-term, frequent and multiple views of this site. Commercial and institutional workers and visitors are considered moderately sensitive to changes in their visual environment because they are generally familiar with the existing visual environment. Local commuters are also considered moderately sensitive to changes in their visual environment because they have passing views of the project site. Occasional motorists are not considered sensitive to changes in the visual environment, as they would not be familiar with the existing visual environment.

In general, most viewers traveling along the roadway would have a moderate awareness of the surroundings, since their primary focus is on traffic and the roadway, or on finding the location they are looking for. This could also be expected of bicyclists, since they, in addition to these concerns, have the added concern of avoiding cars and pedestrians while traveling along the roadway. However, pedestrians would have a much greater potential for awareness since they are traveling slower. Similarly, due to their frequent travel in the area, pedestrian residents would likely have a greater awareness. Business/facilities owners and employees might be expected to have a higher awareness due to the frequency of views, while their customers would likely have a lower awareness.

The narrative descriptions of viewer exposure and viewer sensitivity for each viewer group were merged to establish the overall viewer response of each group. The results are illustrated in Table 3.2-1.

Table 3.2-1: Viewer Group Response Summary

Viewer Group	Exposure			Sensitivity			Total
	Location	Duration	Quantity	Activity	Aware	Values	
Community Residents	Mod	Mod	Mod	Mod	High	High	Mod High
Business/Facility Owners, Employees, and Customers	Mod	Mod Low	Mod Low	Mod	Mod	High	Mod
Local Street Users – Automobiles	Mod	Low	Low	Mod	Mod	Mod	Mod
Local Street Users – Pedestrians and Bicyclists	Mod	Low	Low	Mod	Mod	High	Mod
Note: Responses follow the guidance in FHWA's 1981 Visual Impact Assessment for Highway Projects.							

Resource Change (Key Viewpoint) Analysis

Resource change is assessed by evaluating the visual character and the visual quality of the visual resources that comprise the project site before and after the construction of the proposed project. Resource change is one of the two major variables in the equation that determine visual impacts.

- Visual character includes attributes such as form, line, color, texture, and is used to describe the visual environment, not evaluate; in that these attributes are neither considered good nor bad. However, a change in visual character can be evaluated when it is compared with the viewer's response to that change. Changes in visual character can be identified by how visually compatible a proposed project would be with the existing condition by using visual character attributes as an indicator.
- Visual quality is evaluated by considering the vividness, intactness, and unity present in the visual environment. These three criteria are defined below:
 - Vividness is the extent to which the landscape is memorable and is associated with distinctive, contrasting, and diverse visual elements.
 - Intactness is the integrity of visual features in the landscape and the extent to which the existing landscape is free from non-typical visual intrusions.
 - Unity is the extent to which all visual elements combine to form a coherent, harmonious visual pattern.

Public attitudes validate the assessed level of quality and predict how changes to the view can affect these attitudes. This process helps identify specific methods for addressing each visual impact that may occur as a result of the project.

Because it is not feasible to analyze all the views in which the proposed project would be seen, it is necessary to select some key views associated with visual assessment units that would most clearly demonstrate the change in the project's visual resources. Key views also represent the viewer groups that have the highest potential to be affected by the project considering exposure and sensitivity. For this analysis, two key viewpoints were analyzed for impacts on the visual environment. For each key viewpoint, there is descriptive text of the orientation, existing visual character/quality, proposed project features, anticipated changes to the visual environment, anticipated viewer response, and the resulting visual impact anticipated in each view. Detailed analysis is presented in the Visual Impact Assessment Technical Memorandum (Parsons 2021).

Key Viewpoint 1

Figure 3.2-3 shows an existing view along with a photo simulation of the anticipated changes to the visual environment of Key Viewpoint #1.

Figure 3.2-3: Existing and Simulated Views of the EBMF on East 111th Place

Viewpoint Location



EXISTING VIEW



SIMULATED VIEW



Note: The post-construction simulation shows the potential conceptual building design based on similar facilities constructed by the City. However, the final appearance will be developed as part of the final design process.

Orientation: The photograph is taken from a point along the sidewalk of East 111th Place looking east toward the project site. The perspective is from the view of a pedestrian on the north side of the street.

Existing Visual Character/Quality: The existing visual character of this view is typical of older commercial/warehouse developments with an older concrete warehouse structure and the majority of the site paved. Street elements include street signs, light poles, and overhead power lines.

Overall, the visual quality of the existing view is estimated to be low, with low vividness and unity, and moderate intactness.

Proposed Project Features: The proposed project features in this view include the placement of a new two-story structure within the site and a decorative fence and landscaping along East 111th Place.

Changes to Visual Character: The biggest change to the view will be the removal of the existing building and construction of the new facility structures, along with the softening elements along the roadway.

Anticipated Viewer Response: It is anticipated that viewers would have a moderate to moderately high sensitivity to any changes in the visual environment. Residents, pedestrians, and bicyclists would have a higher degree of sensitivity than drivers and travelers on the roadway. Within this view, the groups most affected are anticipated to be residents, particularly those that face the facility along, with pedestrians, and sidewalk users, with automobile traffic less affected due to the shorter duration of their views.

Resulting Visual Impact: The resulting changes to the views of the project site are not expected to be substantial due to the nature of the changes. The replacement of the old warehouse structure with a new building may increase the visual acceptance of the facility, given the conceptual design provides more interest to the façade. The addition of the decorative fence and landscaping along East 111th Place would also enhance the current low aesthetic appeal of the streetscape along the road.

Table 3.2-2 rates the anticipated changes in visual character and quality, as well as their effects on the viewers of Key Viewpoint #1.

**Table 3.2-2: Key Viewpoint #1
Anticipated Changes in Visual Character & Quality, and Their Effect on Viewers**

	Attribute	Ratings ⁷		Remarks (Anticipated changes are shown in the blue rows)
		Existing Condition	Proposed Condition ⁵	
Visual Quality ¹	Vividness/Memorability	1.80	3.00	
	Intactness	2.70	2.90	
	Unity	1.75	2.75	

Table 3.2-2: Key Viewpoint #1
Anticipated Changes in Visual Character & Quality, and Their Effect on Viewers

	TOTAL AVERAGE⁶	2.08	2.88	Percent Change = +38%
Visual Character²	Scale	2.30	2.40	
	Diversity	1.50	2.25	
	Continuity	2.35	2.75	
	Dominance	2.25	2.30	
	TOTAL AVERAGE⁶	2.10	2.42	Percent Change = +15%
Viewer Exposure³	Location of Views	4.25		
	Number of Viewers	2.00		
	Duration of Views	3.80		
	TOTAL AVERAGE⁶	3.35		Moderate Exposure
Viewer Sensitivity⁴	Attention of Viewer	4.00		
	Viewer Awareness	4.00		
	Local Values and Goals	3.80		
	TOTAL AVERAGE⁶	3.93		Moderately High Sensitivity

1 – Vividness = memorable, striking (5) to plain (1); Intactness = free of encroaching elements (5) to cluttered/lacking integrity (1); and Unity = coherent/harmonious (5) to disjointed/jarring (1). A rating below 1 would only be used for an extremely low rating.

2 – Scale = small (5) to monumental (1); Diversity = complex (5) to monolithic (1); Continuity = harmonious (5) to dissonant (1); and Dominance = balanced (5) to prominent/unbalanced (1). A rating below 1 would only be used for an extremely low rating.

3 – Location = foreground (5) to distant views (1); Number = over 100,000 (5) to 20 or less (1); Duration = over 4 hours (5) to less than 1 minute (1). A rating below 1 would only be used for an extremely low rating.

4 – Activity = attention on views (5) to attention focused away (1); Awareness = High (5) to Low (1); and Values = High (5) to Low expectations (1). A rating below 1 would only be used for an extremely low rating.

5 – Proposed (post-construction condition) with avoidance and minimization measures in place. Avoidance and minimization measures are described in Section 11 of this report.

6 – Total = sum of attributes divided by number of attributes – e.g. Overall Visual Quality = (vividness+intactness+unity)/3.

7 – Ratings: 1 = Low, 3 = Moderate, 5 = High

Note: Ratings made by California Registered Landscape Architect based on guidance in FHWA's 1981 Visual Impact Assessment for Highway Projects.

Note that the rating table was prepared based on the assumption that the following features would be included in the project design:

PDF-V-1: The project shall be designed to provide vegetative screening along the east and west sides of the site to minimize the views into the proposed facility from the two community assets - Animo James B. Taylor Charter Middle School on the east and Kedren Health Community Center on the west.

PDF-V-2: The project shall be designed to set back the proposed building along East 111th Place to allow for landscaping along the street to soften the height of the building on the streetscape.

PDF-V-3: Where feasible, the project shall be designed to allow for vine plantings along the inside of the wall along the railroad tracks and provide vine portals to allow the vines to grow over the backside of the wall to minimize the surface area for graffiti.

Key Viewpoint 2

Figure 3.2-3 shows the location of Key Viewpoint 1 and an existing view along with a photo simulation of the anticipated changes to the visual environment of Key Viewpoint #2.

Orientation: The photograph is taken from the south side of the sidewalk along East Lanzit Avenue looking northeast across the existing railroad tracks towards the project site. The perspective is from the view of a pedestrian.

Existing Visual Character/Quality: The existing visual character of this site shows the back wall to the existing warehouse on the site. The site is located across a set of existing railroad tracks that will not be affected or altered by the proposed project. Overall, the visual quality of the existing view is estimated to be low, with low vividness, intactness, and unity.

Proposed Project Features: The proposed project features in this view include the placement of a perimeter wall along the edge of the existing railroad tracks. In addition, the roofline of the proposed service center structure may be visible above the wall.

Changes to Visual Character: The biggest change to the view will be the removal of the old wall and the construction of the new wall, with elements of the proposed maintenance facility visible above portions of the wall.

Anticipated Viewer Response: It is anticipated that viewers would have a moderately low to moderate sensitivity to any changes in the visual environment. Residents, pedestrians, and bicyclists would have a higher degree of sensitivity than drivers and travelers on the roadway. Within this view, the groups most affected are anticipated to be residents, particularly those that face the facility along, with pedestrians, and sidewalk users, with automobile traffic less affected due to the shorter duration of their views.

Resulting Visual Impact: The resulting changes to the view are not expected to be substantial due to the nature of the changes. The replacement of the old wall with the new one would not substantially alter the overall view of the site.

Table 3.2-3 rates the anticipated changes in visual character and quality, as well as their effect on the viewers of Key Viewpoint #2.

Figure 3.2-4: Existing and Simulated Views of the EBMF on East Lanzit Avenue

Viewpoint Location



EXISTING VIEW



SIMULATED VIEW



Note: The post-construction simulation shows the potential wall design based on similar facilities constructed by the City. However, the final appearance will be developed as part of the final design process. In addition, the posts and chain-link along the railroad are not part of the proposed project and there will be no change to the existing railroad right-of-way.

Table 3.2-3: Key Viewpoint #2
Anticipated Changes in Visual Character & Quality, and Their Effect on Viewers

	Attribute	Ratings ⁷		Remarks (Anticipated changes are shown in the blue rows)
		Existing Condition	Proposed Condition ⁵	
Visual Quality¹	Vividness/Memorability	1.00	2.00	
	Intactness	1.25	2.00	
	Unity	1.50	2.00	
	TOTAL AVERAGE⁶	1.25	2.00	Percent Change = +60%
Visual Character²	Scale	1.75	2.00	
	Diversity	1.00	2.25	
	Continuity	1.00	1.85	
	Dominance	1.50	1.75	
	TOTAL AVERAGE⁶	1.31	1.96	Percent Change = +49%
Viewer Exposure³	Location of Views	4.25		
	Number of Viewers	2.00		
	Duration of Views	3.80		
	TOTAL AVERAGE⁶	3.35		Moderate Exposure
Viewer Sensitivity⁴	Attention of Viewer	4.00		
	Viewer Awareness	4.00		
	Local Values and Goals	3.80		
	TOTAL AVERAGE⁶	3.93		Moderately High Sensitivity

1 – Vividness = memorable, striking (5) to plain (1); Intactness = free of encroaching elements (5) to cluttered/lacking integrity (1); and Unity = coherent/harmonious (5) to disjointed/jarring (1). A rating below 1 would only be used for an extremely low rating.

2 – Scale = small (5) to monumental (1); Diversity = complex (5) to monolithic (1); Continuity = harmonious (5) to dissonant (1); and Dominance = balanced (5) to prominent/unbalanced (1). A rating below 1 would only be used for an extremely low rating.

3 – Location = foreground (5) to distant views (1); Number = over 100,000 (5) to 20 or less (1); Duration = over 4 hours (5) to less than 1 minute (1). A rating below 1 would only be used for an extremely low rating.

4 – Activity = attention on views (5) to attention focused away (1); Awareness = High (5) to Low (1); and Values = High (5) to Low expectations (1). A rating below 1 would only be used for an extremely low rating.

5 – Proposed (post-construction condition) with avoidance and minimization measures in place. Avoidance and minimization measures are described in Section 11 of this report.

6 – Total = sum of attributes divided by number of attributes – e.g. Overall Visual Quality = (vividness+intactness+unity)/3.

7 – Ratings: 1 = Low, 3 = Moderate, 5 = High

Note: Ratings made by California Registered Landscape Architect based on guidance in FHWA's 1981 Visual Impact Assessment for Highway Projects.

3.2.4 CEQA Checklist

This section presents the responses to Appendix G of the CEQA Checklist under Aesthetics.

a) Would the project have a substantial adverse effect on scenic vista?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections A.1 and A.2); City of Los Angeles General Plan; Caltrans SER, Chapter 27; Visual Impact Assessment (Parsons, 2022).

Comment: A scenic vista provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. A significant impact may occur if the project either introduced incompatible visual elements within a public field of view containing a scenic vista or substantially altered a view of a scenic vista.

No impact. No scenic vistas or scenic resources have been identified within the immediate areas surrounding the proposed site. Thus, no impact on scenic vistas would occur with the project.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Reference: L.A. CEQA Thresholds Guide (2006) (Section A.1 and E.3); City of Los Angeles General Plan; Caltrans SER; California Scenic Highway System List; Visual Impact Assessment (Parsons, 2022).

Comment: A significant impact may occur where scenic resources within a State Scenic Highway would be damaged by or removed for the project. For purposes of this analysis, scenic resources include trees, rock outcrops, and historic buildings.

No impact. There is no All-American Road, National Scenic Byway, California State Scenic Highway, or City Scenic Highway near the site or visible from the site. There is also no streetscape plan or scenic corridor plan that encompasses the site or surrounding streets. No impacts on a State-designated or City-designated Scenic Highway would occur.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Reference: L.A. CEQA Thresholds Guide (Sections A.1 and A.3); City of Los Angeles General Plan; Caltrans SER, Chapter 27; Aesthetics; Visual Impact Assessment (Parsons, 2022).

Comment: A significant impact may occur if the project introduces incompatible visual elements to the project site or visual elements that would be incompatible with the character of the area surrounding the project site or conflict with applicable zoning and other regulations governing scenic quality.

Less than significant impact. The existing site is developed with warehouses and the buildings reflect the industrial nature of warehouses from the 1950s, as shown partly in Figure 3.2-1. In addition, the existing perimeter fencing is an open iron rail picket fence allowing views into the site from East 111th Place and the residential units that face the site (at least where the existing buildings do not fall along the edge of the property). Similar to the north side of the site, the south side along East Lanzit and the UPRR has a similar fence along the edge of the site (between the site and the UPRR tracks) with an additional existing chain-link fence along the outside edge of the UPRR tracks (between the tracks and East Lanzit Avenue), as shown in Figure 3.2-2.

The proposed facility would include a new 2-story building with maintenance facilities on the first floor and offices and crew parking on the second floor, as illustrated in Figures 2-4 and 2-5.

The proposed facility would be surrounded by a perimeter wall and fence similar to the LADOT downtown facility at 454 East Commercial Street in Los Angeles. This will include a minimum of 6-foot-high block walls on the eastern, southern, and western boundaries of the project site and a combination block wall and steel mesh fence, with steel mesh gates, along the site frontage on 111th Place (northern boundary). The material and construction of the buildings will reflect an industrial architectural design aesthetic consisting of exposed steel, masonry, and concrete, as shown in the conceptual site elevation in Figure 2-6.

Given that the existing site is developed industrial-style buildings from the 1950s that have limited architectural character, the proposed structures would appear as a visual improvement to the character of the site and the adjacent neighborhood.

In addition, the project would be designed to comply with applicable development standards and design guidelines in the Southeast Los Angeles Community Plan, Southeast Los Angeles CPIO District, and the City's Zoning Regulations (SC-LU-1), as discussed in the Community Impact Assessment Report (Parsons, 2022) for the project. These standards include allowable floor area ratios, massing, building height, architectural elements/building design, parking, signs, lighting, open space and setbacks, landscaping, sustainability features, equipment, fencing and walls, utilities, and industrial design guidelines. Impacts related to changes in visual quality would be less than significant.

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

Reference: L.A. CEQA Thresholds Guide (Section A.4); City of Los Angeles General Plan; Caltrans SER, Chapter 27; Aesthetics; Visual Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the project caused a substantial increase in ambient illumination levels beyond the property line or caused new lighting to spill over onto light-sensitive land uses such as residential, some commercial, and institutional uses that require minimum illumination for proper function, and natural areas.

Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare can be either a daytime or nighttime occurrence caused by the reflection of sunlight or artificial light from reflective surfaces, such as window glass. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades that are largely or entirely comprised of highly-reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

Less than significant impact. Given the industrial/warehouse use of the site for over 60 years, the presence of building lights and outdoor area lighting for security and safety, and the existing streetlights on East 111th Place and Lanzit Avenue, the anticipated lighting levels from the proposed use would be comparable to existing lighting levels on the site. One advantage of modern fixtures vs. older lighting fixtures is that modern lights contain cut-off characteristics that reduce light spillover into adjacent properties. In addition, the project would be designed to be in compliance with the design guidelines in the Southeast Los Angeles Community Plan's Appendix B (Southeast Los Angeles Design Guidelines) regarding lighting for security purposes and avoiding overspill into adjacent properties, in accordance with SC-LU-1. Impacts on light and glare would be less than significant and no mitigation is required.

3.3 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
agricultural use or conversion of forest land to non-forest use?				

3.3.1 Regulatory Setting

This section describes existing laws and regulations related to agriculture and forestry resources that apply to the project.

3.3.1.1 Federal

There are no federal regulations that specifically address impacts related to agriculture, although there are designated National Forests near the City designated for permanent preservation as open space.

3.3.1.2 State

Farmland Mapping and Monitoring Program

The California Farmland Mapping and Monitoring Program (FMMP) tracks California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status, with the best quality land designated as Prime Farmland. Other farmland designations include Farmland of Statewide Importance, Unique Farmland, Grazing Land, Farmland of Local Importance, and Farmland of Local Potential. Urban and Built-Up land includes land occupied by structures at a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.

California Land Conservation Act/Williamson Act

The California Land Conservation Act of 1965 or Williamson Act allows local governments to enter into contracts with private landowners restricting the conversion of agricultural land or open space use to urban land uses within a set time frame. In turn, landowners pay lower property tax assessments (based on farming and open space uses as opposed to full market value).

3.3.1.3 Local

City of Los Angeles Zoning Regulations

Chapter 1, Article 2 of the LAMC contains the City's Zoning Regulations. Areas zoned as A1 and A2 Agricultural Zones allow farming, nurseries, aviaries, and apiaries, as well as the keeping of livestock.

3.3.2 Existing Environment

The site is developed with two industrial buildings and does not support agricultural uses. Under the FMMP, the project site and surrounding areas are designated as Urban and Built-Up land, except for the linear SCE transmission line right-of-way, which is designated as Farmland of Statewide Importance. This Farmland of Statewide Importance area is located approximately 250 feet west of the site and consists of plant nurseries and small gardens under high-voltage power transmission lines that run west of and parallel to Stanford Avenue. These gardens and nurseries are not under Williamson Act contracts.

The nearest forest to the site is the Angeles National Forest, which is located at the San Gabriel Mountains, approximately 20 miles to the north.

3.3.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Reference: California Farmland Mapping and Monitoring Program.

Comment: A significant impact may occur if the proposed project will result in the conversion of state-designated agricultural land from agricultural use to non-agricultural use.

No impact. The proposed EBMF would be located on developed parcels designated as Urban and Built-Up land and would not affect adjacent plant nurseries and gardens on land designated as Farmland of Statewide Importance. No conversion of Farmland to other uses would occur with the EBMF. The project would have no impact on designated Farmlands. No mitigation is required.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Reference: City of Los Angeles Zoning Regulations and Zoning Map; California Department of Conservation Williamson Act Program.

Comment: A significant impact may occur if the proposed project were to result in the conversion of land zoned for agricultural use or land subject to a Williamson Act contract, from agricultural use to non-agricultural use.

No impact. The proposed EBMF site is located on the land zoned as M1-1-CPIO (Limited Industrial-Height District 1-CPIO) and there are no lands with A1 or A2 zoning

near the site. The site is not zoned for agricultural uses and would not convert the existing on-site industrial use to a different land use. In addition, the project would not convert adjacent lands that are zoned as M1-1, R2 (Multiple Family Residential), or PF (Public Facilities) to other uses. Also, no agricultural land under a Williamson Act contract would be affected by the project. No conflict with the zoning or agricultural use of adjacent lands would occur. The EBMF would have no impact on an agricultural zone or a Williamson Act contract. No mitigation is required.

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

Reference: US Forest Service National Forest Locator Map.

Comment: A significant impact would occur if the project would conflict with existing zoning or causes the rezoning of forest land or timberland.

No impact. The proposed EBMF is not located in or near the Angeles National Forest, which is the nearest forest to the site. There is no timberland on or near the site. The project would not conflict with the zoning of land within the National Forest nor have any effect on timberland. No impact would occur and no mitigation is required.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Reference: US Forest Service National Forest Locator Map.

Comment: See comment above.

No impact. The proposed EBMF site is not located in forest land. No conversion of forest land to other uses would occur with the project. No impact to forest land would occur and no mitigation is required.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land non-forest use?

Reference: California Farmland Mapping and Monitoring Program; US Forest Service National Forest Locator Map.

Comment: See comment above.

No impact. The EBMF would retain the existing industrial use of the project site and would not lead to the conversion of adjacent lands to other uses. As there are no agricultural uses or forests near the site, no impacts on agriculture and forest resources related to land conversion are expected, and no mitigation is required.

3.4 Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An Air Quality Impact Assessment Technical Memorandum (TAHA, 2021) was prepared for the project and is provided in Appendix B. The findings of the assessment are summarized below.

3.4.1 Regulatory Setting

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of an overall endeavor to prevent further deterioration and to facilitate improvement in air quality. This section describes existing laws and regulations related to air quality that apply to the project.

3.4.1.1 Federal

Clean Air Act

The federal Clean Air Act (CAA) is the comprehensive federal law that regulates air emissions to protect public health and welfare. The United States Environmental Protection Agency (USEPA) is responsible for the implementation and enforcement of the CAA, which establishes federal National Ambient Air Quality Standards (NAAQS), specifies future dates for achieving compliance, and requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also

INITIAL STUDY
LOS ANGELES DEPARTMENT OF TRANSPORTATION

mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS.

The six principal pollutants for which NAAQS have been promulgated include ozone O₃, respirable and fine particulate matter (PM₁₀ and PM_{2.5}, respectively), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted for them. The NAAQS are listed in Table 3.4-1.

Table 3.4-1: Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard ^{a,b}	California Standard ^{a,b}	South Coast Air Basin Attainment Status ^c	
				Federal Standard ^d	California Standard ^d
Ozone (O ₃)	1-hour	—	0.09 ppm (180 µg/m ³)	—	Non-Attainment
	8-hour	0.070 ppm (137 µg/m ³)	0.07 ppm (137 µg/m ³)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM ₁₀)	24-hour	150 µg/m ³	50 µg/m ³	Attainment	Non-Attainment
	Annual	—	20 µg/m ³		
Fine Particulate Matter (PM _{2.5})	24-hour	35 µg/m ³	—	Non-Attainment (Serious)	Non-Attainment
	Annual	12 µg/m ³	12 µg/m ³		
Carbon Monoxide (CO)	1-hour	35 ppm (40 mg/m ³)	20 ppm (23 mg/m ³)	Attainment	Attainment
	8-hour	9 ppm (10 mg/m ³)	9.0 ppm (10 mg/m ³)		
Nitrogen Dioxide (NO ₂)	1-hour	0.10 ppm (188 µg/m ³)	0.18 ppm (339 µg/m ³)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m ³)	0.030 ppm (57 µg/m ³)		
Sulfur Dioxide (SO ₂)	1-hour	0.075 ppm (196 µg/m ³)	0.25 ppm (655 µg/m ³)	Unclassified/ Attainment	Attainment
	3-hour	0.5 ppm (1,300 µg/m ³)	—		
	24-hour	0.14 ppm (365 µg/m ³)	0.04 ppm (105 µg/m ³)		
	Annual	0.03 ppm (80 µg/m ³)	—		

Table 3.4-1: Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard ^{a,b}	California Standard ^{a,b}	South Coast Air Basin Attainment Status ^c	
				Federal Standard ^d	California Standard ^d
Lead (Pb)	30-day average	—	1.5 µg/m ³	Partial Non-Attainment ^e	Attainment
	Rolling 3-month average	0.15 µg/m ³	—		
Sulfates	24-hour	—	25 µg/m ³	—	Attainment
Hydrogen Sulfide (H ₂ S)	1-hour	—	0.03 ppm (42 µg/m ³)	—	Unclassified

ppm = parts per million by volume
µg/m³ = micrograms per cubic meter

^a An ambient air quality standard is a concentration level expressed in either parts per million or micrograms per cubic meter and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.

^b Ambient Air Quality Standards based on the 2016 AQMP.

^c "Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.

^d California and Federal standard attainment status based on SCAQMD's 2016 AQMP and 2018 updates from CARB. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>.

^e An attainment re-designation request is pending.

Sources: USEPA, NAAQS Table, <https://www.epa.gov/criteria-air-pollutants/naaqs-table>.
CARB, Ambient Air Quality Standards May 4, 2016, <https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf>.

3.4.1.2 State

California Clean Air Act

The California Clean Air Act (CCAA) requires all areas of the State to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. The California Air Resources Board (CARB) is responsible for the coordination and administration of both state and federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Table 3.4-1 above includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the state.

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended, or repealed by the state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes of any location. In addition, Section 93115 in Title 17 of the CCR states that the operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

CARB Diesel Regulations

CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. Statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed by State agencies. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

California Air Toxics Program

The California Air Toxics Program was established to address potential health effects from exposure to toxic substances in the air. CARB has promulgated a number of Airborne Toxic Control Measures (ATCMs), both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include measures such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment to reduce public exposure to diesel particulate matter (DPM) and other toxic air contaminants (TACs). The California Air Toxics Program is supplemented by the Assembly Bill (AB) 2588 Air Toxics “Hot Spots” program and Senate Bill (SB) 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce the risks through the implementation of a risk management plan.

3.4.1.3 Regional

South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan

The SCAQMD is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside, and San Bernardino Counties, including the Coachella Valley. The SCAQMD, together with the Southern California Association of Governments (SCAG), has the responsibility for ensuring that national and state ambient air quality standards are achieved and maintained for the SCAB.

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of Air Quality Management Plans (AQMP), which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with

the NAAQS and CAAQS in a timely manner. The 2016 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O₃ and PM_{2.5} are met and that public health is protected to the maximum extent feasible. It is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives, and ocean-going vessels. These strategies are to be implemented in partnership with the CARB and USEPA. The AQMP also incorporates the transportation strategy and transportation control measures from the SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies.

SCAG is required by law to ensure that transportation activities “conform” to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2016 AQMP for the SCAB, are based on the 2016-2040 RTP/SCS. On September 3, 2020, SCAG’s Regional Council adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS was determined to conform to the federally-mandated SIP, for the attainment and maintenance of NAAQS standards. CARB accepted SCAG’s determination that the SCS met the applicable State GHG emissions targets. The 2020-2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP.

SCAQMD Air Quality Guidance Documents

The SCAQMD published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The CEQA Air Quality Handbook provides standards, methodologies, and procedures for conducting air quality analyses. However, the SCAQMD is currently in the process of replacing the CEQA Air Quality Handbook with the Air Quality Analysis Guidance Handbook. While this process is underway, the SCAQMD has provided supplemental guidance on the SCAQMD website.

The SCAQMD has published a guidance document called the Final Localized Significance Threshold Methodology for CEQA evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during the construction or operation of a project. The SCAQMD adopted additional guidance regarding PM_{2.5} emissions in a document called Final Methodology to Calculate Particulate Matter (PM)_{2.5} and PM_{2.5} Significance Thresholds. The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and Final Localized Significance Threshold Methodology.

SCAQMD Rules and Regulations

The SCAQMD has published a Rule Book to regulate sources of air pollution in the SCAB and to help achieve air quality standards for land use development projects, which include, but are not limited to the following:

- Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions, and breakdown events. The following is a list of rules which apply to the project:
 - Rule 401 – Visible Emissions: This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
 - Rule 402 – Nuisance: This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
 - Rule 403 – Fugitive Dust: This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM₁₀ emissions to less than 50 micrograms per cubic meter (µg/m³), and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Measures include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, a contingency plan may be required if deemed necessary.
- Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units that emit toxic air contaminants or other non-criteria pollutants. The following is a list of rules which may apply to the project:
 - Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities: This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

3.4.1.4 Local

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element sets forth the goals, objectives, and policies which guide the City in the implementation of its air quality improvement programs and strategies. A number of these goals, objectives, and policies related to land use development and traffic mobility, minimizing particulate emissions from construction activities, discouraging single-occupancy vehicle trips, managing traffic congestion during peak hours, and increasing energy efficiency in City facilities and private developments.

Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles lays the foundation to create healthier communities for all residents in the City. As an element of the General Plan, it provides a high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. With a focus on public health and safety, the Plan for a Healthy Los Angeles provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment (i.e., improved ambient and indoor air quality), the opportunity to thrive, and access to health services, affordable housing, and healthy and sustainably produced food.

Transportation Control Measures

The City is responsible for the implementation of transportation control measures as outlined in the AQMP. The City can fund infrastructure that contributes to improved air quality through capital improvement programs. Following CEQA requirements and the CEQA review process, the City assesses the air quality impacts of projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces the implementation of such mitigation measures.

3.4.2 Existing Environment

3.4.2.1 Existing Local Air Quality

The City of Los Angeles is located within the South Coast Air Basin (SCAB), which is known to have high concentrations of air pollution. Over the past 30 years, substantial progress has been made in reducing air pollution levels in Southern California. However, the SCAB still fails to meet the State and/or national standards for O₃, particulate matter less than 10 microns in diameter (PM₁₀), and particulate matter less than 2.5 microns in diameter (PM_{2.5}). In addition, Los Angeles County still fails to meet the national standard for Pb. The Los Angeles County portion of the SCAB is designated as attainment or maintenance of the ambient air quality standards for CO, NO₂, and SO₂.

SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin and has divided the SCAB into 38 source receptor areas (SRAs) in which 31 monitoring stations operate. The proposed project site is located in SRA 12 (South Central Los Angeles County). The monitoring station that collects ambient air quality

INITIAL STUDY
LOS ANGELES DEPARTMENT OF TRANSPORTATION

data to represent air quality conditions in SRA 12 is the Compton-700 North Bullis Road Monitoring Station, which measures ambient concentrations of O₃, NO₂, CO, and PM_{2.5}. As the Compton monitoring station is not equipped to measure concentrations of PM₁₀, data has been supplemented from the Central Los Angeles County monitoring station at 1630 North Main Street in downtown Los Angeles. Table 3.4-2 presents the air quality data statistics during the time period 2018–2020. As shown, ambient concentrations of O₃ and PM_{2.5} exceeded the associated NAAQS and CAAQS numerous times over the three-year period. Additionally, concentrations of PM₁₀ measured at the North Main Street station exceeded the CAAQS in all three years. Concentrations measured at the Compton and North Main Street monitoring stations reflect the nonattainment status of the Los Angeles County portion of the SCAB.

Table 3.4-2: Local Ambient Air Quality Data – South Central Los Angeles County

Pollutant	Air Quality Standards	Statistics	2018	2019	2020
Ozone (O ₃)	<u>1-hr. Average (ppm)</u> State Standard: 0.090 ppm	Maximum 1-hr. Concentration Frequency Std. Exceeded	0.075 0	0.100 1	0.152 3
	<u>8-hr. Average (ppm)</u> State/Nat Standard: 0.070 ppm	Maximum 8-hr. Concentration Frequency Std. Exceeded	0.063 0	0.079 1	0.115 4
Nitrogen Dioxide (NO ₂)	<u>1-hr. Average (ppm)</u> State Standard: 0.18 ppm National Standard: 0.10 ppm	Maximum 1-hr. Concentration Frequency Std. Exceeded Frequency Std. Exceeded	0.068 0 0	0.070 0 0	0.073 0 0
	<u>8-hr. Average (ppm)</u> State Standard: 9.0 ppm National Standard: 9.0 ppm	Maximum 8-hr. Concentration Frequency Std. Exceeded Frequency Std. Exceeded	3.5 0 0	3.2 0 0	3.1 0 0
Carbon Monoxide (CO)	<u>1-hr. Average (ppm)</u> State Standard: 20.0 ppm National Standard: 35.0 ppm	Maximum 1-hr. Concentration Frequency Std. Exceeded Frequency Std. Exceeded	4.7 0 0	3.8 0 0	4.5 0 0
	<u>8-hr. Average (ppm)</u> State Standard: 9.0 ppm National Standard: 9.0 ppm	Maximum 8-hr. Concentration Frequency Std. Exceeded Frequency Std. Exceeded	3.5 0 0	3.2 0 0	3.1 0 0
Respirable Particulate Matter (PM ₁₀)	<u>24-hr. Average (µg/m³)</u> State Standard: 50 µg/m ³ National Standard: 150 µg/m ³	Maximum 24-hr. Concentration Frequency Std. Exceeded Frequency Std. Exceeded	68.2 31 0	62.4 15 0	83.7 34 0
	<u>Annual Average (µg/m³)</u> State Standard: 20 µg/m ³	Annual Avg. Concentration Annual Std. Exceeded?	34.0 Yes	- -	33.9 Yes
Fine Particulate Matter (PM _{2.5})	<u>24-hr. Average (µg/m³)</u> National Standard: 35 µg/m ³	Maximum 24-hr. Concentration Frequency Std. Exceeded	49.4 2	39.5 1	67.5 19
	<u>Annual Average (µg/m³)</u> State Standard: 12 µg/m ³ National Standard: 12 µg/m ³	Annual Avg. Concentration Annual Std. Exceeded? Annual Std. Exceeded?	13.2 Yes Yes	10.8 No No	14.6 Yes Yes
SOURCE: SCAQMD, Historical Data by Year – Air Quality Data Tables 2018–2020, Available at: https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year . Accessed November 2021.					

3.4.2.2 Existing Ambient Health Risk

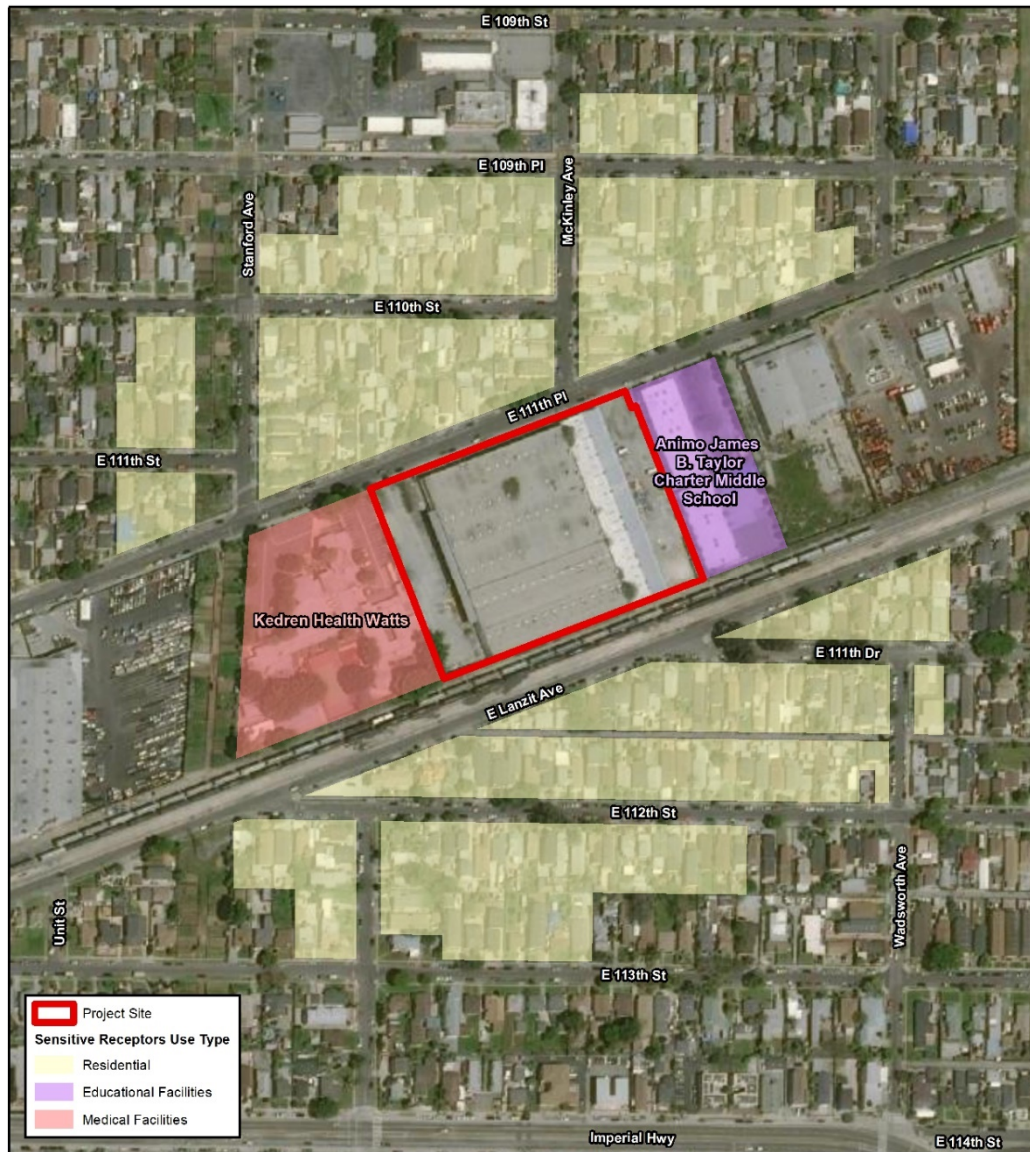
The SCAQMD's Multiple Air Toxics Exposure Study (MATES-IV) revealed that the estimated cancer risk for the vast majority of the urbanized area within the SCAB ranges from 200 to over 1,200 cancers per million people over a 70-year duration. Approximately 50 percent of the risk in ambient air is attributed to diesel particulate matter (diesel PM), approximately 38 percent to other toxics associated with mobile sources (including benzene, butadiene, and carbonyls), and approximately 12 percent of all carcinogenic risk is attributed to stationary sources (which include large industrial operations such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating). The risk at the proposed project site based on the regional emissions inventory and interpolated analysis is estimated to be approximately 520 excess cancers per million people, which ranks in the 84th percentile of risk throughout the SCAB.

3.4.2.3 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups as the most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. The SCAQMD and CARB guidance recommends sensitive receptor locations to consider, including residences, schools, playgrounds, child-care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive receptors (see Figure 3.4-1) near the site include:

- Animo James B. Taylor Charter Middle School located adjacent to the proposed project site on the eastern side;
- Kedren Health Community Center and Head Start Preschool located adjacent to the proposed project site on the western side;
- Residential uses located to the northwest, north, and northeast across E. 111th Place, approximately 60 feet from the site boundary; and,
- Residential uses located to the southwest, south, and southeast beyond the railroad tracks and E. Lanzit Avenue, approximately 125 feet from the site boundary.

Figure 3.4-1. Sensitive Receptors Surrounding the Proposed Project Site



3.4.3 Impact Analysis

3.4.3.1 Methodology

The air quality impact analysis focuses on the potential changes in the air quality environment due to the implementation of the project. The analysis of potential air quality impacts was prepared following guidance from the SCAQMD CEQA Air Quality Handbook and the L.A. CEQA Thresholds Guide. Although SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with projects within the SCAB, such as the proposed project. Instead, SCAQMD published the CEQA Air Quality Handbook to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects proposed in the SCAB.

The City's L.A. CEQA Thresholds Guide was published in 2006 and incorporates elements of the SCAQMD CEQA Air Quality Handbook in the section on Air Quality.

The assessment of potential impacts to regional and local air quality as a result of project implementation addresses both temporary emissions associated with construction activities, as well as long-term operational emissions. Emissions are generally quantified daily and expressed in terms of pounds per day (lbs/day) for comparison to the SCAQMD mass daily thresholds and LST screening values. Also addressed are TAC emissions in accordance with the L.A. CEQA Thresholds Guide. The detailed methodology and model results are documented in the Air Quality Technical Memorandum (TAHA, 2021).

Construction

The construction of the proposed project is tentatively anticipated to begin no earlier than the summer of 2024 and would take approximately two years to complete. The project's "regional" emissions refer to emissions that will be evaluated based on regional significance thresholds established by SCAQMD. Daily regional emissions during construction are estimated by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying mobile source and fugitive dust emissions factors compiled from the available USEPA and CARB emission estimation tools. The emissions are quantified using CalEEMod (Version 2020.4.0) software, an emissions inventory software program recommended by the SCAQMD. The CalEEMod model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with SCAQMD and received input from other California air districts and is currently used by numerous lead agencies in the Los Angeles area and within the state for quantifying the emissions associated with development projects undergoing environmental review, including by the City of Los Angeles.

Operations

Analysis of the proposed project's impact on regional air quality during long-term operations (i.e., after construction is complete) takes into consideration four types of sources: (1) area; (2) energy; (3) mobile; and (4) stationary. Area source emissions are generated by, among other things, landscaping and other equipment and the use of chemically formulated consumer products. Energy source emissions are generated as a result of activities in buildings for which natural gas is used (e.g., heating). Mobile source emissions are generated by the increase in motor vehicle trips to and from the proposed project site associated with routine operations. The Transportation/Traffic Impact Analysis for the proposed project (Parsons, 2022) determined that daily operations would generate approximately 759 vehicle trips at the new EBMF location and that existing operations at the LADOT Compton Facility produce 669 vehicle trips. For the purposes of satisfying CEQA requirements, operational emissions were quantified and compared to a baseline of zero as there are no active uses currently existing on the project site.

CalEEMod (Version 2020.4.0) was used to estimate the mass daily emissions that would occur during the future operation of the proposed project following the completion of construction activities. Proposed project facilities were generally characterized as an industrial park, and default mobile vehicle trip rates were replaced with the trip generation estimated by the Transportation/Traffic Impact Analysis. Area source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. Consumer products are chemically formulated products used by household and institutional consumers—such as detergents, cleaning compounds, polishes, floor finishes, personal care products, disinfectants, and sanitizers—but do not include other paint products, furniture coatings, or architectural coatings. Natural gas usage factors in CalEEMod are based on the California Energy Commission *California Commercial End Use Survey* data set, which provides energy demand by building type and climate zone.

Toxic Air Contaminant Emissions

In addition to criteria pollutants and O₃ precursors, the Air Quality impacts assessment evaluated potential exposures of sensitive receptors surrounding the project site to TAC emissions that would be generated during the construction and operation of the proposed project.

Construction of the proposed project would produce TAC emissions in the exhaust of diesel-fueled internal combustion engines that power heavy-duty off-road equipment and on-road material hauling trucks, predominantly in the form of diesel PM. Due to the proximity of sensitive land uses that are practically adjacent to the boundary of the proposed project site, a construction health risk assessment (HRA) was prepared to assess potential exposures of nearby residential and school receptors to diesel PM concentrations generated by the exhaust of heavy-duty off-road diesel equipment that would be used to construct the proposed project.

The HRA is prepared using a two-step methodology that first involves the simulation of pollutant concentrations in ambient air resulting from emissions generated by the construction of the proposed project. Following preferred industry practice, the HRA used the Gaussian-plume air dispersion model AERMOD to simulate diesel PM concentrations that would result at surrounding sensitive receptor locations from the use of off-road equipment during the proposed project construction. A grid array of 192 cubic volume sources was organized using side lengths of 10 meters to cover the approximate area that equipment would be operating within during construction activities, as shown in Figure 3.4-2.

Figure 3.4-2. Health Risk Assessment AERMOD Sources and Receptors



The second step of the HRA involves the dose and risk calculations based on concentrations of pollutants modeled in AERMOD. Results of the air dispersion modeling portion of the construction HRA—expressed in concentration units of micrograms per cubic meter (g/m^3) for diesel PM—were used to estimate the incremental increase in ambient carcinogenic risk resulting from continuous exposure at the maximally exposed individual receptor (MEIR) location, as well as recurring exposure to school receptors.

Cumulative carcinogenic exposures during the two-year construction period for the proposed project were conservatively estimated for residential and school receptors assuming continuous exposure at the receptor location with the highest modeled concentration of diesel PM. This approach likely overestimated potential exposures by a substantial margin; however, it is also the most protective of public health and consistent with preferred regulatory methodologies.

Regarding operational TAC emissions, the implementation of the proposed project would not introduce a substantial source of TAC emissions to the project area. CARB published the *Air Quality and Land Use Handbook* (CARB Handbook) on April 28, 2005, to serve as a general guide for considering health effects associated with siting sensitive receptors proximate to sources of TAC emissions. The goal of the guidance

document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center; and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines. The operation of the proposed project would not constitute a significant risk facility, examples of which include landfills, paint booths, refineries, and oil production facilities, among others.

3.4.4 Responses to CEQA Checklist

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines and the City's Thresholds supplemented by the SCAQMD Air Quality Significance Thresholds, Project impacts are analyzed for significance as follows:

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections B.1 to B.3); Los Angeles General Plan Air Quality Element; Southeast Los Angeles Community Plan; SCAQMD's CEQA Air Quality Handbook (1993); SCAQMD AQMP; SCAG 2016-2040 RTP/SCS and 2020-2045 RTP/SCS; Air Quality Impact Assessment (TAHA, 2022).

Comment: A significant impact may occur if the project is inconsistent with or would obstruct implementation of the Air Quality Element of the City's General Plan, the SCAQMD's AQMP, and SCAG's RTP/SCS.

Less than significant impact. In accordance with the procedures established in SCAQMD's CEQA Air Quality Handbook, the impact discussion should address the following criteria to determine whether the project is consistent with applicable SCAQMD and SCAG planning objectives:

- 1) Would the project create any impacts related to air quality violations, such as:
 - An increase in the frequency or severity of existing air quality violations;
 - Causing or contributing to new air quality violations; or,
 - Delaying timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- 2) Would the project exceed the assumptions utilized in preparing the AQMP:
 - Is the project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
 - Does the project incorporate mitigation measures to reduce potentially significant impacts; and/or
 - To what extent is project development consistent with the AQMP land use policies and control measures?

Criterion 1: Air Quality Violations

Air quality violations occur when facilities are out of compliance with applicable SCAQMD rule requirements, permit conditions, or legal requirements, or with applicable state or federal air pollution regulations. Implementation of the project would not introduce a new permanent, stationary source of air pollutant emissions that would constitute a facility capable of contributing to air quality violations.

Construction

Air quality violations are determined by an SCAQMD Air Quality Inspector when a business is out of compliance with applicable SCAQMD rule requirements, permit conditions, or legal requirements, or with applicable state or federal air pollution regulations. Air quality violations typically involve large industrial facilities that emit vast quantities of regulated pollutants and are not common among typical land use development projects. Construction of the proposed project would be conducted in accordance with SCAQMD Regulation IV, Rule 401 (Visible Emissions) and Rule 403 (Fugitive Dust), and CARB ATCM 2485 (Vehicle and Equipment Idling) (SC-AQ-1). The application of water as a dust suppressant to material stockpiles and disturbed ground areas would reduce fugitive dust emissions during construction activities by approximately 61 percent. All construction equipment and vehicles would be maintained and operated within manufacturer specifications to limit unnecessary emissions during use, limit engine idling, and any vehicles traveling on unpaved surfaces would be required to limit their speed to 15 miles per hour or less. The construction of the proposed project would not have the potential to obstruct or conflict with the implementation of the 2016 AQMP in the context of SCAQMD rule requirements.

Table 3.4-3 presents the maximum daily emissions that would be generated by sources involved in each phase of construction of the proposed project. The results of the mass daily emissions analysis demonstrate that the construction of the proposed project would not have the potential to exacerbate the frequency or severity of air quality violations occurring within the City or the SCAB. Therefore, the construction of the proposed project would result in a less than significant impact and would not conflict with or obstruct the implementation of the AQMP with regard to air quality violations.

Table 3.4-3: Proposed Project Construction Emissions

Construction Activity	Maximum Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
DEMOLITION & DEBRIS REMOVAL						
On-Site Emissions	0.8	6.7	11.9	<0.1	1.6	0.5
Off-Site Emissions	0.1	3.3	1.5	<0.1	0.7	0.2
Daily Total	0.9	10.0	13.4	<0.1	2.3	0.7
SITE PREPARATION						
On-Site Emissions	1.1	10.2	10.9	<0.1	1.8	1.1

Table 3.4-3: Proposed Project Construction Emissions

Construction Activity	Maximum Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Off-Site Emissions	0.1	0.1	1.2	<0.1	0.5	0.1
Daily Total	1.2	10.3	12.2	<0.1	2.3	1.2
GRADING						
On-Site Emissions	1.0	9.9	10.6	<0.1	1.8	1.1
Off-Site Emissions	0.1	0.1	1.2	<0.1	0.5	0.1
Daily Total	1.1	10.0	11.9	<0.1	2.3	1.2
PAVING						
On-Site Emissions	1.0	7.1	11.0	<0.1	0.4	0.3
Off-Site Emissions	0.1	0.5	1.4	<0.1	0.5	0.1
Daily Total	1.1	7.6	12.4	<0.1	0.9	0.5
BUILDING CONSTRUCTION + FINISHING + LANDSCAPING						
On-Site Emissions	14.7	12.9	19.5	<0.1	0.5	0.5
Off-Site Emissions	0.3	0.8	3.0	<0.1	1.2	0.3
Daily Total	15.0	13.8	22.5	<0.1	1.7	0.8
REGIONAL ANALYSIS						
Maximum Regional Emissions	15.0	13.8	22.5	<0.1	2.3	1.2
SCAQMD Regional Threshold	75	100	550	150	150	55
Regional Threshold Exceeded?	No	No	No	No	No	No
LOCALIZED ANALYSIS						
Maximum Localized Emissions	14.7	12.9	19.5	<0.1	1.8	1.1
Localized Significance Threshold ^{/a/}	-	46	231	-	4	3
Localized Threshold Exceeded?	-	No	No	-	No	No
/a/ LST screening values correspond to an SRA 12 construction site with one acre daily disturbance and receptors within 25 meters.						
Source: TAHA, 2021.						

Operations

Future long-term operation of the proposed project would involve similar activities to those presently occurring at the LADOT South Los Angeles Bus Maintenance Facility, with the exception that the planned bus fleet would be entirely electric whereas the existing bus fleet is predominately comprised of vehicles powered by compressed natural gas (CNG) and propane. Table 3.4-4 presents the daily air pollutant emissions that would be generated by the operation of the proposed project and compares them to the SCAQMD mass daily screening thresholds. As shown, operational emissions of criteria pollutants and O₃ precursors would remain substantially below all applicable SCAQMD screening values. Therefore, the operation of the proposed project would not conflict with the implementation of the 2016 AQMP and would result in a less than significant impact related to air quality violations.

Table 3.4-4: Proposed Project Operations Emissions

Operational Source	Maximum Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	1.5	<0.1	<0.1	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.2	0.2	<0.1	<0.1	<0.1
Mobile Sources	2.0	2.1	19.3	<0.1	4.8	1.3
REGIONAL ANALYSIS						
Daily Operational Emissions	3.5	2.3	19.5	<0.1	4.9	1.3
SCAQMD Regional Threshold	55	55	550	150	150	55
Regional Threshold Exceeded?	No	No	No	No	No	No
LOCALIZED ANALYSIS						
Daily On-Site Emissions	1.5	<0.1	<0.1	<0.1	<0.1	<0.1
SCAQMD Localized Threshold	-	630	98	-	4	2
Localized Threshold Exceeded?	-	No	No	-	No	No
Emissions modeling files can be found in Attachment B. Source: TAHA, 2021.						

Criterion 2: AQMP Assumptions

With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan and SCAG's 2016–2040 RTP/SCS. The SCAQMD Air Quality Handbook recognizes that if a project is consistent with the local General Plan, then it would not conflict with the implementation of the AQMP.

Construction

The construction of the proposed project would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, the construction workers employed for construction would likely be taken from the labor pool currently residing in the City and the surrounding communities. Thus, the construction phase of the project would be temporary, lasting for approximately 24 months, and would not create permanent growth in population, housing, or employment within the City or SCAQMD jurisdiction.

Therefore, the construction of the Project would have no impact on regional growth projections accounted for in SCAQMD and SCAG plans.

Additionally, construction activities to implement the proposed project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, CARB ATCM 2485, etc.) and best management practices (BMPs) as required by CARB and SCAQMD (SC-AQ-1). Emissions generated during construction would not pose concerns related to air quality violations, and no project-specific mitigation measures have been identified to reduce potentially significant impacts. Therefore, the construction of the proposed project would not conflict with or obstruct the implementation of the 2016 AQMP and would result in less than significant impacts.

Operations

Operation of the proposed project would involve similar activities to those that are ongoing at the Compton Facility, although the new facility would provide additional employment opportunities. Approximately 312 employees would be working onsite in staggered shifts. With the existing 203 employees at the Compton Facility to be transferred to the proposed project, an additional 109 new employees generated by the project would not compromise the SCAG Connect SoCal growth projections for the City, which forecasts an employment increase of 287,600 jobs between 2016 and 2045. Therefore, the operation of the proposed project would not render the underlying assumptions of the AQMP invalid.

Impacts associated with project implementation (i.e., construction and operations) would be less than significant with compliance with applicable CARB and SCAQMD Rules and Regulations (SC-AQ-1), and no mitigation is required.

Standard Conditions

SC-AQ-1: The construction and operation of the project shall comply with applicable California Air Resource Board (CARB) and South Coast Air Quality Management District (SCAQMD) Rules and Regulations, including but not limited to CARB ATCM 2485 and SCAQMD Rules 401 through 403 and 1403.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections B.1 and B.2); SCAQMD AQMP; SCAQMD's CEQA Air Quality Handbook (1993); SCAQMD Air Quality Significance Thresholds; SCAQMD Regulations; Air Quality Impact Assessment (TAHA, 2022).

Comment: A significant impact would occur if project activities resulted in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality

standard. Potential sources that may produce substantial pollutant concentrations include equipment and vehicle exhaust and earthwork activities.

Less than significant impact. The City of Los Angeles lies within an area that is presently designated nonattainment of the NAAQS for O₃, PM_{2.5}, and Pb (pending possible reclassification to attainment) and is designated nonattainment of the CAAQS for O₃, PM₁₀, and PM_{2.5}.

The SCAQMD published guidance that asserts that if construction or operation of a project would produce maximum daily emissions exceeding the applicable project-specific thresholds, those emissions would also be considered cumulatively significant. For this reason, the SCAQMD applies the same project-level thresholds to cumulative assessments. Conversely, if the construction and operation of a project would not generate emissions of sufficient quantity to exceed any of the applicable mass daily thresholds, then that project and its associated emissions would be considered less than significant in the cumulative context.

Construction

Construction of the proposed project has the potential to create air quality impacts through O₃-precursor and particulate matter emissions generated using off-road diesel-fueled construction equipment and through vehicle trips associated with construction crews and trucks traveling to and from the construction site. As shown in Table 3.4-3, daily emissions of O₃ precursors and particulate matter would remain substantially below the applicable SCAQMD regional and LST screening values during all phases of construction. Contractors would be required to comply with the provisions of SCAQMD Regulation IV and employ BMPs to reduce fugitive dust and prevent the occurrence of visible dust plumes, and vehicle and equipment idling shall comply with CARB regulations (SC-AQ-1). Emissions of VOC, NO_x, PM₁₀, and PM_{2.5} would remain below the project-level thresholds, and thus would not be considered cumulatively considerable based on SCAQMD guidance.

Operations

As shown in Table 3.4-4, the operation of the proposed project would not generate emissions of O₃ precursors, PM₁₀, or PM_{2.5} in excess of any applicable SCAQMD regional or LST screening value. Implementation of the proposed project would not introduce a new stationary source of air pollutant emissions for which there is an ongoing cumulative air quality impact through nonattainment. Therefore, the operation of the proposed project would not result in cumulatively considerable emissions of any nonattainment pollutant or atmospheric precursor.

Impacts during construction and operations would be less than significant with compliance with applicable CARB and SCAQMD Rules and Regulations (SC-AQ-1), and no mitigation is required.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections B.1 to B.3); SCAQMD Air Quality Handbook; CARB Regulations; SCAQMD Regulations; OEHHA Risk Assessment Guidance; Air Quality Impact Assessment (TAHA, 2022).

Comment: A significant impact would occur if project activities would expose sensitive receptors to substantial pollutant concentrations. Potential sources that may produce substantial pollutant concentrations include equipment and vehicle exhaust.

Less than significant impact. Sensitive receptors surrounding the project site include the adjacent Animo James B. Taylor Charter Middle School to the east, Kedren Community Center to the west; residential uses across E. 111th Place to the west, northwest, north, and northeast, and residential uses across the UPRR rail line and E. Lanzit Avenue to the southwest, south, and southeast. Analysis of potential sensitive receptor exposures to substantial pollutant concentrations was based on the SCAQMD LST methodology and the OEHHA risk assessment guidelines for emissions generated during short-term construction activities and long-term operations.

SCAQMD has established quantitative thresholds for exposure to TAC emissions. A significant air quality impact may occur if TAC emissions from construction or operation of a project were to result in a sensitive receptor being subjected to an increased carcinogenic risk of greater than 10 excess cancers per million or a Hazard Index (HI) greater than 1.0.

Construction

Construction of the proposed project would last for approximately 24 months beginning in the summer of 2024. Sources of air pollutant emissions involved in the construction of the proposed project would include off-road equipment exhaust and fugitive dust and on-road vehicles exhaust and fugitive (evaporative and dust) emissions. Sensitive receptors surrounding the proposed project site would predominantly be exposed to pollutant levels emanating from sources located onsite, which comprise off-road equipment exhaust and fugitive dust generation. The estimated maximum daily emissions of NO_x, CO, PM₁₀, and PM_{2.5} produced by sources on the project site would remain substantially below the applicable SCAQMD LST screening values (see Table 3.4-3), which were derived to prevent the occurrence of substantial criteria pollutant concentrations.

Additionally, the off-road equipment fleet involved in construction activities was assumed to be comprised entirely of diesel-fueled units, which release diesel PM to the atmosphere through the exhaust stacks. An inhalation-pathway HRA was prepared to analyze possible exposures of nearby sensitive receptors to diesel PM concentrations that would be generated by the use of diesel-fueled construction equipment. The HRA assessed the maximum potential exposures and associated carcinogenic risks to sensitive receptors that would be located at the adjacent middle school as well as throughout the surrounding residential communities. Table 3.4-5

presents the results of the construction HRA and the applicable SCAQMD incremental risk threshold. As shown, the incremental excess cancer risk at both school and residential receptors during the construction of the proposed project would remain below the applicable SCAQMD threshold of 10 excess cancers per million. Therefore, the construction of the proposed project would not expose nearby sensitive receptors to levels of TAC concentrations that would exceed the SCAQMD screening threshold.

Table 3.4-5: Construction Health Risk Assessment

Parameter	Middle School Receptors		Residential Receptors		Kedren Center & Headstart Preschool Receptors	
	Adult	Student	Adult	Child	Adult	Student
Average Concentration [$\mu\text{g}/\text{m}^3$]	0.10626	0.10626	0.04145	0.04145	0.04626	0.04626
Breathing Rate [L/kg/day]	240	460	335	861	240	640
Exposure Frequency	0.50	0.50	0.96	0.96	0.50	0.50
Age Sensitivity Factor	1	3	1	3	1	3
Adjustment Factor	4.2	4.2	1.0	1.0	4.2	4.2
Fraction of Day Exposed	1.0	1.0	0.73	0.72	1.0	1.0
Exposure Duration [Years]	2.0	2.0	2.0	2.0	2.0	2.0
Incremental Excess Risk	1.68	9.68	0.31	2.32	0.73	5.86
SCAQMD Risk Threshold	10	10	10	10	10	10
Threshold Exceeded?	No	No	No	No	No	No
SOURCE: TAHA, 2021.						

Operations

Implementation of the proposed EBMF would provide critical support infrastructure to the LADOT all-electric transit fleet and would generally involve charging, maintenance, and servicing activities on the project site. Long-term daily emissions of NO_x , CO, PM_{10} , and $\text{PM}_{2.5}$ would remain substantially below the applicable SCAQMD LST screening thresholds and would not have the potential to produce concentrations near or exceeding the localized concentration thresholds. Furthermore, implementation of the proposed project would not site a land use typically known to be associated with substantial TAC emissions close to sensitive receptors. The proposed project would be generally consistent with the surrounding land use patterns and would not introduce a new stationary source of TAC emissions to the project area. The BEBs would not consume petroleum-based fuels that produce emissions of TACs as a result of internal combustion engines. Therefore, the operation of the proposed project would

not have the potential to expose sensitive receptors to substantial pollutant concentrations.

Impacts during construction and operations would be less than significant and no mitigation is required.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Reference: L.A. CEQA Thresholds Guide (Section B.2); SCAQMD CEQA Air Quality Handbook; SCAQMD Rule Book (Regulation IV); Air Quality Impact Assessment (TAHA, 2022).

Comment: A significant impact would occur if the project created objectionable odors during construction or operation that would affect a substantial number of people. A significant impact may also occur if the proposed project generated emissions that could cause or contribute to a public nuisance affecting the surrounding community. A public nuisance could occur if emissions generated by proposed project activities during construction or operation produced visible dust plumes in violation of SCAQMD Rule 401 or Rule 403, or noxious odors in violation of SCAQMD Rule 402.

Less than significant impact. The analysis of potential impacts related to nuisance odors and other emissions that could adversely affect a substantial number of people was prepared to address both short-term construction and the future long-term operation of the proposed project.

Construction

Potential sources that may produce objectionable odors during construction activities include equipment exhaust, application of architectural coatings, and other interior and exterior finishes. Odors from these sources would be localized and generally confined to the immediate area surrounding the proposed project site, would be temporary, and would not persist beyond the termination of construction activities. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and would be temporary. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. Construction of the proposed project would comply with the provisions of CARB ATCM 2485 to reduce vehicle and equipment exhaust emissions and with SCAQMD Rule 401 and Rule 403 to prevent the occurrence of visible dust plumes (SC-AQ-1). Additionally, a public liaison would be appointed to address public concerns related to construction activities including excessive noise, dust, or odor (SC-CC-4). Therefore, the construction of the proposed project would result in a less than significant impact related to emissions of odors and other potential nuisance conditions.

Operations

According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting,

refineries, landfills, dairies, and fiberglass molding. The proposed project would not include a land use typically associated with odor impacts. Operation of the EBMF would comply with City codes and regulations pertaining to waste collection and disposal. Operational impacts would be less than significant related to the emissions of odors and other potential nuisance conditions.

Impacts associated with project implementation (i.e., construction and operations) would be less than significant, with compliance with applicable CARB and SCAQMD Rules and Regulations (SC-AQ-1), and no mitigation is required.

3.5 Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.5.1 Regulatory Setting

This section describes existing laws and regulations related to biological resources that apply to the project.

3.5.1.1 Federal

Endangered Species Act of 1973

Section 9 of the federal *Endangered Species Act* (ESA) protects species listed as Endangered and/or Threatened by the U.S. Fish and Wildlife Service (USFWS) and forbids any person to “take” an Endangered or Threatened species. Take is defined in the ESA as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or attempt to engage in any such conduct.” Sections 7 and 10 of the Act may authorize incidental take for an otherwise lawful activity if it is determined that the activity would not jeopardize the survival or recovery of the species.

Migratory Bird Treaty Act of 1918

The *Migratory Bird Treaty Act* (MBTA) prohibits the killing or transport of native migratory birds, or any part, nest, or egg of any such bird unless allowed by another regulation adopted in accordance with the MBTA. Permits from USFWS and authorization for potential take under the MBTA are part of the ESA Section 7 consultation process.

3.5.1.2 State

California Endangered Species Act

The *California Endangered Species Act* (CESA) serves to conserve, protect, restore, and enhance Threatened or Endangered species and their habitats. It mandates state agencies to not approve projects that would jeopardize the continued existence of Threatened or Endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. For projects that affect both a state- and federally listed Threatened or Endangered species, compliance with the federal ESA will satisfy the CESA if the California Department of Fish and Wildlife (CDFW) determines that the federal incidental take authorization is consistent with the CESA under Section 2080.1 of the California Fish and Game Code.

California Fish and Game Code

The California Fish and Game Code establishes the Fish and Game Commission, which regulates the take of fish and game, not including the taking, processing, or use of fish, mollusks, crustaceans, kelp, or other aquatic plants for commercial purposes. The Commission’s responsibilities include setting seasons, bag and size limits, and methods and areas of take, as well as prescribing the terms and conditions under which permits or licenses may be issued or revoked by CDFW. The Commission also oversees the establishment of wildlife areas and ecological reserves and regulates their use.

Sections 3503, 3503.5, 3505, 3800, and 3801.6 of the Fish and Game Code protect all native birds, birds of prey, and all nongame birds, including their eggs and nests, that are not already listed as fully protected under CESA and that occur naturally within the State. CDFW also manages native fish, wildlife, plant species, and natural communities and oversees the management of marine species in coordination with the National Marine Fisheries Services (NMFS) and other agencies.

3.5.1.3 Local

City of Los Angeles General Plan Conservation Element and Open Space Element

The City's General Plan Conservation Element addresses the need to conserve and protect natural resources and open space in the City. Natural resources addressed in this element include water and hydraulic force, forests, soils, rivers, and other waters, harbors, fisheries, wildlife, and minerals. The Open Space Element addresses the preservation, conservation, and acquisition of open space in the City, including lands used for water supply, water recharge, water quality protection, wastewater disposal, solid waste disposal, air quality protection, energy production, and noise prevention.

City of Los Angeles Environmentally Sensitive Areas

LAMC Section 64.70.01 defines Environmentally Sensitive Areas (ESAs) as: "...any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which would be easily disturbed or degraded by human activities and developments. ESAs include, but are not limited to, areas designated as Significant Ecological Areas (SEAs) by the County of Los Angeles, areas designated as Significant Natural Areas by the California Department of Fish and Game's Significant Natural Areas Program and field verified by the Department of Fish and Game, and areas listed in the Los Angeles RWQCB's Basin Plan as supporting the 'Rare, Threatened, or Endangered Species (RARE)' beneficial use."

Preservation of Protected Trees Ordinance

The City's ordinance for the Preservation of Protected Trees (Ordinance No. 177,404), as provided in LAMC Section 46.00 et seq., protects the following tree species that measure 4.0 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree:

- Oak trees, including Valley oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*).
- Western Sycamore (*Platanus racemosa*)
- California Bay (*Umbellularia californica*)
- Southern California Black Walnut (*Juglans californica* var. *californica*)

These trees may not be relocated or removed, including acts that damage the root system or other parts of the tree by fire, application of toxic substances, operation of equipment or machinery, or by changing the natural grade of land by excavation or filing the drip line area around the trunk, unless a permit from the Board of Public Works is acquired. As a condition of the permit, at least two trees of a protected variety shall be planted within the same property and each replacement tree shall be at least a 15-gallon, or larger, specimen, measuring 1.0 inch or more in diameter 1.0 foot above the base, and be not less than 7.0 feet in height measured from the base.

Board of Public Works Street Tree Removal Permit and Tree Replacement Condition Policies

LAMC Sections 62.161 through 62.176 authorize the Board of Public Works and its officers and employees to control the planting, maintenance, and care of trees, plants, and shrubs in all public rights-of-way in the City. The Board adopted the Street Tree Removal Permit and Tree Replacement Condition Policies to formalize existing City practices and designate the Bureau of Street Services, Chief Forester, as the authorized officer and employee to issue street tree removal permits; require public notification of the proposed removal of three or more street trees; require a Board of Public Works public hearing for consideration of the removal of three or more street trees at a specific address; and require as a condition of a street tree removal permit that replacement street trees be provided on a 2:1 basis with 24-inch box size tree stock to be watered for a minimum 3-year period.

City of Los Angeles Tree Planting Ordinance

Ordinance No. 183474 amended Sections 61.162, 62.163, and 62.169 of the LAMC to clarify that the responsibility for planting and maintaining street trees and vegetation within City streets rests with the City, and further clarifies that a property owner in a residential zone may remove and plant vegetation within a parkway, but that street trees may not be removed without a permit.

3.5.2 Existing Environment

A site visit was conducted by Emile Fiesler, Parsons biologist, on June 2, 2021 to identify biological resources at the project site. The project site is highly disturbed and developed with two industrial buildings and paved driveways and parking areas, with vegetation limited to the edges of the site plus a narrow, vegetated street-front area along 111th Place. The vegetated strip along the east edge of the site contains the majority of the site's vegetation and is planted predominantly with yew trees (*Afrocarpus* cf. *falcatus*). Large varnish trees (*Ailanthus altissima*) grow in a narrow strip between the two buildings and along the southern section of the west edge of the site. Many varnish tree sprouts and saplings have also appeared at various locations on the property. The west edge of the site is lined with pear trees (*Pyrus calleryana*), ash trees (*Fraxinus* cf. *uhdei*), and a tree that looks like a non-native black walnut (*Juglans nigra*). Most of these trees are rooted on the west side of the property fence. The remainder of the vegetation appears to have sprouted from seed.

Of the 42 plant species observed on the site, only 2 are locally native species: mat amaranth (*Amaranthus blitoides*) and fringed willow-herb (*Epilobium ciliatum ciliatum*). Both appear to have sprouted from seed. The remainder of the vegetation consists of exotic ornamentals and weedy non-native species, many of which are invasive species.

The most invasive are the non-native annual grasses, including hairy crabgrass (*Digitaria sanguinalis*), dallisgrass (*Paspalum dilatatum*), and knotgrass (*Paspalum distichum*), followed by other invasive herbs including common sowthistle (*Sonchus oleraceus*), prickly lettuce (*Lactuca serriola*), bristly ox-tongue (*Helminthotheca*

echioides), horseweed (*Erigeron cf. bonariensis*), radium-plant (*Euphorbia peplus*), cheeseweed mallow (*Malva parviflora*), and black-medic (*Medicago lupulina*). Among the trees, the varnish tree (*Ailanthus altissima*) and Mexican fan palm (*Washingtonia robusta*) are the most invasive.

The majority of wildlife observed at the site consisted of non-native rock pigeons (*Columba livia*) that are nesting profusely inside the eastern building. Other birds observed are the Northern mockingbird (*Mimus polyglottos*) and American crow (*Corvus brachyrhynchos*). No mammals, reptiles, or amphibians were observed, but common urban and urbanized mammal species like the raccoon, black rat, house mouse, Virginia opossum, striped skunk, and fox squirrel are expected in the area. A few invertebrate animals were observed, including jumping spiders, wall spiders, hover flies, aphids, psyllids, and an immature katydid.

No sensitive species, listed species, or other species of concern were found within the project site. In addition, the project site is surrounded by urban development, streets, and railroad tracks and is not located in or near a City-designated ESA or a USFWS-designated Critical Habitat for Threatened & Endangered Species. Similarly, the site does not serve as a wildlife corridor due to the lack of large open spaces and parks on the site and in the surrounding area. In addition, there is no adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP) in the City or near the site.

3.5.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C); City of Los Angeles General Plan; CNDDDB; USFWS IPaC; NMFS database; CNPS database; USFWS Critical Habitat for Threatened & Endangered Species.

Comment: A significant impact may occur if the project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited.

Less than significant impact with mitigation incorporated. Review of the CDFW's California Natural Diversity Database (CNDDDB), the USFWS' Information for Planning and Consultation (IPaC), NMFS database, and California Native Plant Society (CNPS) database identified sensitive plant and animal species that are likely to be present in the project area (i.e., those previously found in the Inglewood USGS quadrangle).

None of these sensitive species were observed on the site and no suitable habitat for these species is present at the site.

While there are no sensitive vegetation communities, ESAs, or designated Critical Habitats on the site that may support candidate, sensitive, or special status species, the project would disturb the entire site during demolition and construction activities, including the removal of existing vegetation on the site. While the site does not contain a habitat for sensitive biological resources, the existing trees and buildings may support nesting birds, and thus, construction activities could inadvertently disturb occupied/active nests. MM-BIO-1 requires the timing of construction activities outside the bird nesting season or to conduct bird nesting surveys before the start of vegetation clearing and demolition activities to identify and protect active nests. This mitigation measure would avoid adverse impacts on migratory birds. As such, impacts on sensitive species and migratory birds would be less than significant after mitigation.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C); City of Los Angeles General Plan; USFWS Critical Habitat for Threatened & Endangered Species; USFWS National Wetlands Inventory Wetlands Mapper.

Comment: A significant impact may occur if riparian habitat or any other sensitive natural community were to be adversely modified.

No impact. The EBMF would be located on a developed site and highly urbanized area. There are no natural streams, riparian areas, unlined drainage channels, coastal areas, sand dunes, or other sensitive natural communities and habitats in or near the site. No direct impacts to riparian areas and natural communities would occur with the project. Runoff during construction would enter the underground storm drain system on East 111th Place and would not directly affect any riparian habitat or other sensitive natural community. Stormwater best management practices (BMPs) would be implemented as part of the project's Stormwater Pollution Prevention Plan (SWPPP) during construction (SC-HYD-1) and operations (SC-HYD-2) to avoid impacts to downstream water bodies, such as Compton Creek. No impacts would occur and no mitigation is required.

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

Reference: L.A. CEQA Thresholds Guide (2006) (Section C)); City of Los Angeles General Plan; USFWS National Wetlands Inventory Wetlands Mapper.

Comment: A significant impact may occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed.

No impact. There are no natural drainages, open channels, or wetland areas, including lakes, ponds, rivers, creeks, streams, or coastal areas, on or near the project site. The nearest water body is Compton Creek, a concrete-lined drainage channel located approximately 0.2-mile north and 0.3-mile east of the site. No direct impacts to this creek would occur. There would be no impacts on wetlands and no mitigation is required.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C); City of Los Angeles General Plan.

Comment: A significant impact may occur if the project interferes or removes access to a migratory wildlife corridor or impedes the use of native wildlife nursery sites.

No impact. The site is not located on the City's hillside areas or in large open spaces, which serve as wildlife corridors. The site is developed and does not serve as a wildlife corridor nor does it support wildlife movement and wildlife nursery sites. Thus, no impact on wildlife movement would occur and no mitigation is required.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C); City of Los Angeles General Plan; Preservation of Protected Trees Ordinance; Street Tree Removal Permit and Tree Replacement Condition Policies; Tree Planting Ordinance.

Comment: A significant impact would occur if the project caused an impact that was inconsistent with local regulations pertaining to biological resources.

No impact. The project would remove existing trees on the site but these trees are not considered California native trees nor are they one of the City's Protected Trees. Thus, the project would not conflict with the City's Preservation of Protected Trees Ordinance. There are no street trees on East 111th Place along the site frontage and the project would not require a Street Tree Removal Permit or compliance with the City's Tree Replacement Condition Policies, and Tree Planting Ordinance. The project would not conflict with the City's tree preservation policies and ordinances. No impact would occur and no mitigation is required.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C); City of Los Angeles General Plan; CDFW NCCP Plan Summaries.

Comment: A significant impact may occur if the project would cause an impact that is inconsistent with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or local regulations pertaining to biological resources. A significant impact may occur if the project would be inconsistent with mapping or policies in any conservation plans.

No impact. There is no HCP or NCCP in the City and the site is highly disturbed and is not located in or near an HCP or NCCP. Thus, no conflict with an HCP or NCCP is expected with the project. No impact would occur and no mitigation is required.

3.5.4 Mitigation Measures

MM-BIO-1: To avoid impacts to migratory birds, the vegetation removal, demolition, and site clearing activities shall occur during the non-breeding season (e.g., between September 1 and February 15). If such activities would have to be scheduled during this period, a qualified biologist shall conduct a preconstruction nesting bird survey to determine if any nesting birds are present within the site. This survey should be conducted no more than 7 days before the start of vegetation removal. If nesting birds are found, an exclusionary buffer would be set up and clearly marked around each active nest site. Construction or clearing shall not be conducted within this zone until the qualified biologist determines that nesting birds have fledged or the nest is no longer active.

3.6 Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An Archaeological Resources Assessment (ARA) (Parsons, 2022), Historic Resources Evaluation Report (HRER) (Parsons, 2022), and Paleontological Resources Analysis (PRA) (Paleo Solutions, 2022) were prepared for the project and are provided in Appendices C1, C2, and C3, respectively. The findings of the memos are summarized below.

3.6.1 Regulatory Setting

This section describes existing laws and regulations related to cultural resources that apply to the project.

3.6.1.1 Federal

National Historic Preservation Act

The National Historic Preservation Act established the National Register of Historic Places (NRHP) to recognize resources associated with the country's history and heritage. Criteria for listing on the NRHP pursuant to Title 26, Part 63 of the *Code of Federal Regulations* are significant in American history, architecture, archaeology, engineering, and culture as presented in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that are either:

- (A) Associated with events that have made a significant contribution to the broad patterns of our history
- (B) Associated with the lives of persons significant in our past

- (C) Embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction or
- (D) Have yielded, or may be likely to yield, information important to history or prehistory

Criterion D is usually reserved for archaeological resources. Properties eligible for the NRHP must be of sufficient age, be proven through scholarship to meet at least one of the significance criteria, and exhibit integrity of the features, elements, and/or informational value that provides the property its documented historical or archaeological significance.

3.6.1.2 State

California Register of Historical Resources

The California Register of Historical Resources (CRHR) was created to identify historical resources deemed worthy of preservation on a State level and was modeled closely after the NRHP. The criteria are nearly identical to those of the NRHP but focus on resources of statewide, rather than national, significance. The CRHR automatically includes any resource listed, or formally designated as eligible for listing, on the NRHP. The State Historic Preservation Office (SHPO) maintains the CRHR, which may also include properties designated under local ordinances or identified through local historical resources surveys that meet CRHR eligibility criteria.

California Public Resources Code Section 5024.5

California Public Resources Code (PRC) Section 5024.5 states: “(a) No state agency shall alter the original or significant historical features or fabric, or transfer, relocate, or demolish historical resources on the [agency’s] master list...” This law also obligates State agencies to adopt prudent and feasible measures that will eliminate or mitigate any potential adverse effects a project may have upon a listed historical resource.

California Public Resources Code Sections 5097.5 and 5097.7

PRC Section 5097.5, as amended, and PRC Section 5097.7 strengthen existing State law regarding criminal penalties and restitution for crimes of archaeological site vandalism, theft of archaeological materials or artifacts in curation facilities, and damages to historic buildings and other cultural properties on State and local government land. The amendment and new section closely follow federal law, specifically the Archaeological Resources Protection Act, which regulates the excavation of archaeological sites and the removal and disposition of archaeological resources on federal and Indian lands.

PRC Chapter 1.7, Sections 5097 and 30244 include additional State-level requirements for the assessment and management of paleontological resources. These statutes require reasonable mitigation of adverse impacts to paleontological resources from developments on State lands and define the excavation, destruction, or removal of paleontological “sites” or “features” from public lands without the express permission of the jurisdictional agency as a misdemeanor. As used in Section 5097,

“state lands” refers to lands owned by, or under the jurisdiction of, the State or any State agency. “Public lands” is defined as lands owned by, or under the jurisdiction of, the State, or any city, county, district, authority, or public corporation, or any agency thereof.

California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097

California *Health and Safety* Code Section 7050.5, and PRC Sections 5097.94 and 5097.98 outline procedures to be followed in the event human remains are discovered during development and other projects. If human remains are encountered, all work must stop at that location and the County Coroner must be immediately notified and advised of the finding. The County Coroner would investigate “the manner and cause of any death” and make recommendations concerning the treatment of the human remains. The County Coroner must make their determination within 2 working days of being notified. If the human remains are determined to be Native American, the County Coroner shall contact the California Native American Heritage Commission (NAHC). The Commission would in turn “...immediately notify those persons it believes to be most likely descended from the deceased Native American.” The descendants would then inspect the site and make recommendations for the disposition of the discovered human remains. This recommendation from the most likely descendants may include the scientific analysis of the remains and associated items.

3.6.1.3 Local

City of Los Angeles General Plan Framework Element

The City’s General Plan Framework Element addresses cultural resources, including significant archaeological, paleontological, and historical resources in the City, and proposes a means for avoiding potential impacts to known or potential cultural resources. Existing cultural resources were mapped and presented in the Final EIR for the Framework Element, which shows that there are no prehistoric or historic archaeological sites on or near the project site. In addition, there are no vertebrate paleontological resources on or near the site. The area east of Avalon Boulevard, including the site, is identified as having surface sediments with unknown fossils potential.

City of Los Angeles General Plan Conservation Element

The City’s General Plan Conservation Element includes goals, objectives, and policies requiring measures be taken to protect the City’s historical, archaeological and paleontological resources for historical, cultural, research, and/or educational purposes. A policy requires that the City continue to identify and protect significant archaeological and paleontological sites and resources known to exist or that are identified during land development, demolition, or property modification activities.

City of Los Angeles Historic-Monument Ordinance

The City’s Historic-Monument Ordinance (Los Angeles Administrative Code [LAAC] Section 22.171) defines a Historic-Cultural Monument (HCM) as any site, building, or structure of a particular historic or cultural significance. A resource is eligible for listing

as an HCM if it meets specific criteria, as outlined in Article 4, Section 22.130 of the LAAC.

City of Los Angeles Cultural Heritage Ordinance

The City maintains a list of all sites, buildings, and structures that have been designated through the City of Los Angeles Cultural Heritage Ordinance No. 185472 as HCMs. The Cultural Heritage Ordinance has designated more than 1,000 buildings and sites as individual local landmarks or HCMs. A five-member Cultural Heritage Commission oversees the designation and protection of local landmarks, and the Office of Historic Resources (OHR) provides staff support to that Commission. A City HCM is presumed to be a significant historical resource under CEQA, triggering the requirement to perform an environmental review (that could lead to the preparation of an EIR before demolition could occur).

3.6.2 Existing Environment

3.6.2.1 Prehistory

The three major periods of prehistory for the greater Los Angeles Basin region have been refined by recent research using radiocarbon dates from archaeological sites in coastal southern California. These are:

- Millingstone Period (6,000–1,000 B.C., or about 8,000–3,000 years ago);
- Intermediate Period (1,000 B.C.–A.D. 650, or 3,000–1,350 years ago); and
- Late Prehistoric Period (A.D. 650–about A.D. 1800, or 1,350–200 years ago).

Different patterns and types of material culture define each of these periods.

3.6.2.2 Ethnography

The project site is located in the traditional native lands of the Gabrielino of the Shoshonean language stock. Generally, the territory of the Gabrielino covered the Los Angeles Basin, the San Gabriel Valley, the Santa Monica and Santa Ana mountains, the coast from Aliso Creek to Topanga Creek, and the islands of San Clemente, San Nicholas, and Santa Catalina. The Los Angeles Basin was known to include many major Gabrielino villages with a total population estimated at over 10,000 at the time of the Spanish arrival in 1769. Villages included Saar, near Santa Monica, Siba and Akura near San Gabriel, Engva at Redondo, and Ohowi near San Pedro. Gabrielino villages were politically autonomous and were organized along lines of kinship.

During the 18th and 19th centuries, aboriginal Gabrielino society was greatly affected by Spanish colonization. Smallpox, measles, influenza, and other non-endemic diseases rapidly destroyed large segments of the population, leading to the abandonment of many villages and towns. Nevertheless, many Gabrielino survived, working first as laborers at the missions and later as vaqueros (cowboys) on ranches and farms.

3.6.2.3 Historic Overview

The history of Los Angeles can be broken down into four periods: the Early Explorer Period, the Spanish Mission Period, the Mexican Ranch Period, and the Anglo-American Period. The Early Explorer Period is defined by the first European contact with the Gabrielino and subsequent explorations. The Spanish Mission Period is defined by the Franciscan friars who under the sponsorship and administration of the Spanish monarchy initiated mission programs focused on the conversion of aboriginal peoples to Christianity and the establishment of cattle ranches, farms, building projects, and other activities designed to consolidate and secure the western frontier of the Spanish empire. The Mexican Ranch Period is defined by increased secularization resulting from the Mexican Revolution in 1821, which isolated California from the Spanish political capital. The American conquest of the Los Angeles area and its occupation by military forces during the California gold rush period heralded the beginning of the Anglo-American Period.

The project area was originally part of Rancho La Tajauta, a 3,560-acre land area granted by Mexican Governor Manuel Micheltorena to Anastasio Avila in 1843. As with all such land grants in Southern California, the land was primarily devoted to raising livestock, i.e., cattle, sheep, and horses. By about 1875, a rural area several miles south of downtown, and considered outside of the City limits, began to be referred to as Green Meadows, with a store, dairy, and post office bearing that place name before the end of the century. Citizens of the Green Meadows community sought annexation to the City of Los Angeles, and the City accepted the petition in March 1926.

The parcels located between East 111th Place and the railroad tracks and East Lanzit Avenue formed an empty land belt that remained largely vacant and undeveloped until the 1950s, or even later, except for a factory built in the 1920s. The residential neighborhood which rose south of the railroad tracks, leapfrogged over the industrially-zoned land and the march of residential construction continued.

The historic aerial images and historic topographic maps show that the parcels encompassing the site were not utilized during the earlier part of the 20th century. Beginning in the 1930s, development began in areas surrounding the site, and railroad tracks appear on the southern boundary (originally Pacific Electric Railway, now UPRR, along East Lanzit Avenue). Structures in the project area are evident from 1937 onward, with as many as three to six buildings northeast of the project site. However, the development of the site only occurred in the mid-1950s. Based on a review of aerial photography, the project site has remained largely unchanged since that time.

3.6.2.4 Cultural Resources

Archival research focused on the identification of previously recorded cultural resources within a 0.5-mile radius of the proposed Project footprint. The archival research included a review of previously recorded archaeological site records and reports, historic site and property inventories, and historic maps. Inventories of the

NRHP, the CRHR, the California State Historic Resources Inventory (HRI), California Historical Landmarks and Points of Interest, Los Angeles Office of Historic Resources Historic Preservation Overlay Zones (HPOZ), the Survey LA Southeast Los Angeles Community Plan Area, and the list of City of Los Angeles' HCMs were also reviewed to identify cultural resources near the project site.

Three previously recorded historic-age cultural resources were identified within a 0.50-mile radius of the project site, all of them built environment resources. None of these resources are within the project site. No prehistoric archaeological or historic archaeological resources were identified by the records search.

National Register of Historic Places

Two resources within a 0.5-mile radius of the project site have been determined NRHP eligible but no listed or previously determined eligible NRHP properties are located on or immediately adjacent to the site.

California Register of Historical Resources

There are no CRHR-listed resources within a 0.5-mile radius of the project site. No listed or previously-determined eligible CRHR properties are located on or immediately adjacent to the site.

Los Angeles Office of Historic Resources Historic Preservation Overlay Zones

There are no Los Angeles Office of Historic Resources HPOZ within a 0.5-mile radius of the project site.

Survey LA Southeast Los Angeles Community Plan Area

There are no resources listed in Survey LA for the Southeast Los Angeles Community Plan Area for the project site or within the 0.5-mile buffer zone.

Los Angeles Historic-Cultural Monuments

There is one Historic-Cultural Monument within a 0.5-mile radius of the project site that has been designated by the Los Angeles Cultural Heritage Commission: Number 513, Southern California Edison Service Yard Structure, 615 E. 108th Street. This HCM is located approximately 0.28-mile northwest of the project site.

California Historical Landmarks

California Historical Landmarks (CHL) are buildings, structures, sites, or places that have been determined to have statewide historical interest. The Watts Towers at 1765 E. 107th Street, approximately 1.6 miles northeast of the project site, is the closest CHL.

3.6.2.5 Paleontological Resources

The project area is entirely underlain by Holocene-age alluvial gravel, sand, and clay. While not mapped within the project area, Pleistocene-age older alluvium is mapped within a half-mile of the project site and is likely present in the project site at depth. Additionally, artificial fill is also likely present at the surface in previously disturbed portions of the site.

Late Holocene-age younger surficial sediments have a low potential for producing significant paleontological resources and middle and early Holocene-age sediments at depth have a high potential. Various fossil specimens have been recovered from Pleistocene-age sediments in Los Angeles County. Thus, Pleistocene-age surficial sediments are considered to have a high potential for producing significant paleontological resources. Artificial fill comprises recent deposits of previously disturbed sediments and is considered to have a low potential for producing significant paleontological resources.

According to the Natural History Museum of Los Angeles County (NHMLA), there are no previously recorded fossil localities within the project area. However, there are several localities nearby from Pleistocene-age sediments similar to the Pleistocene-age older alluvium that is likely present at depth within the project area. Several sites in the project area (e.g., on 103rd Street and 99th Street, in Compton and the community of Athens, and near the intersection of West Athens Boulevard and Menlo Avenue and the intersection of Artesia Boulevard and Williams Avenue) produced fossil invertebrates such as snails, bivalves, barnacle, scaphopod, and sand dollar, a fossil mammoth, vertebrate fossils, oysters, and pecten from depths of 5 to 735 feet.

3.6.2.6 Field Survey

On June 7, 2021, senior archaeologist Kristina Lindgren, RPA, accompanied by architectural historian Dean Reed, of Paleo Solutions Inc, completed an intensive pedestrian survey of the project site for cultural resources. The pedestrian survey used standard archaeological procedures and techniques meeting the Secretary of the Interior's Standards and Guidelines for a cultural resources survey. No archaeological resources were observed.

3.6.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations Section 15064.5?

Reference: L.A. CEQA Thresholds Guide (2006) (Section D.3); City of Los Angeles General Plan Conservation Element; Southeast Los Angeles Community Plan; HCM List; NRHP; CRHR; HRER (Parsons, 2022).

Comment: A significant impact would result if the project caused a substantial adverse change to the significance of a historical resource, as defined in PRC Section 15064.5. For historical resources, thresholds for a significant impact include the following:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance

and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

No impact. Historic resources are usually 50 years old or older and must meet at least one of the criteria for listing in the CRHR (such as association with historical events, important people, or architectural significance), in addition to maintaining a sufficient level of physical integrity (CEQA Guidelines Section 15064.5[a][3]).

Due to their dates of construction, 21 parcels with buildings on and near the site were evaluated for their historical or architectural significance in the HRER (Appendix C2). The findings of the HRER indicate that none of these parcels were found eligible for listing in the NRHP and the CRHR. Also, none are considered to be historical resources under CEQA, per CEQA Guidelines §15065.5, because they do not meet the CRHR criteria outlined in PRC §5024.1.

Thus, demolition of the existing structures on the site and construction of the project would have no impact on historical resources.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?

Reference: L.A. CEQA Thresholds Guide (Section D.2); City of Los Angeles General Plan; HCM List; NRHP; CRHR; ARA (Parsons, 2022).

Comment: A significant impact would occur if the project caused a substantial adverse change in the significance of an archaeological resource, which falls under the CEQA Guidelines Section 15064.5. A substantial adverse change disturbs, damages, or degrades an archaeological resource or its setting.

Less than significant impact. Based on the ARA (Appendix C1), no archaeological sites or resources were identified within the project site as part of the records search and field survey undertaken for the project. While the maximum extent of anticipated ground disturbance may be up to 15 feet, most of the proposed ground disturbance will be shallow and limited to utility trenching and preparing the new building foundations. Although archaeological sensitivity potential is considered low in the project area, if cultural materials are unearthed during construction, work must be

halted in that area until a qualified archaeologist can assess the significance of the find. If such resources are encountered during ground-disturbing activities, the contractor shall cease excavation and the City of Los Angeles will contact a qualified archaeologist to evaluate and determine the appropriate treatment for the resource in accordance with PRC Section 21083.2(i) (SC-CUL-2, PDF-CUL-1 and PDF-CUL-2). As such, impacts on archaeological resources would be ensured to be less than significant with the implementation of SC-CUL-2, PDF-CUL-1 and PDF-CUL-2, as necessary.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Reference: L.A. CEQA Thresholds Guide (Sections D.1 and E.3); City of Los Angeles General Plan Conservation Element; USGS topographic map for the Inglewood quadrangle; Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources; PRA (Paleo Solutions, 2022).

Comment: A significant impact could occur if grading or excavation activities associated with the project disturb unique paleontological resources or unique geologic features that presently exist within the project site.

Less than significant impact with mitigation incorporated. Based on the PRA (Appendix C3), the project site is located within an area mapped as late Holocene-age deposits that have been subject to disturbances from development activities and it has low paleontological sensitivity. However, the paleontological sensitivity within the project area increases with depth as the sediments transition to middle to early Holocene- and Pleistocene-age deposits. The proposed depths of excavation are 8 feet below ground surface for utility relocations and 15 feet below ground surface for building foundations, and fossils have been reported in the project vicinity at depths as shallow as 5 feet. Therefore, ground-disturbing activities during project construction could impact subsurface paleontological resources if native (i.e., previously undisturbed) sediments belonging to geologic units with high paleontological potential are encountered during construction. Disturbance of subsurface paleontological resources would be less than significant impact with the implementation of MM-PAL-1 through MM-PAL-4. As such, impacts on paleontological resources would be less than significant after mitigation.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Reference: L.A. CEQA Thresholds Guide (Section D.2); HCM List; NRHP; CRHR; ARA (Parsons, 2022).

Comment: A significant impact would occur if grading or excavation activities associated with the proposed project disturbed interred human remains.

Less than significant impact. No cemeteries or burial locations are located on or near the site. In accordance with 14 CCR Section 15064.5(e), in the event of

accidental discovery or recognition of any human remains, work in the immediate vicinity will be suspended and the Los Angeles County Coroner will be notified (California Health and Safety Code Section 7050.5). If the Coroner determines that the remains are not recent and of Native American origin, the Coroner will notify the NAHC in Sacramento within 24 hours to identify the most likely descendant (MLD). The designated MLD may make recommendations to the City of Los Angeles for means of treating or reassigning the human remains and any associated grave goods with appropriate dignity, as provided in PRC Section 5097.98. Compliance with these regulations as SC-CUL-1 would avoid adverse impacts to any discovered human remains. As such, impacts on human remains would be less than significant, which would be ensured by compliance with SC-CUL-1.

3.6.4 Standard Conditions

SC-CUL-1: In the event of the inadvertent discovery of human remains, the Contractor shall immediately notify the County Coroner and the City of Los Angeles. If the County Coroner determines the remains are Native American in origin, the Coroner shall contact the Native American Heritage Commission in accordance with Health and Safety Code (HSC) Section 7050.5 subdivision c, and Public Resources Code (PRC) Section 5097.98 (as amended by Assembly Bill 2641). The Native American Heritage Commission shall designate the most likely descendant (MLD) for the remains per PRC 5097.98. Under PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the MLD regarding their recommendations, if applicable. If the remains are determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the California HSC Section 7100 37 et seq. directing identification of the next-of-kin will apply.

SC-CUL-2: In compliance with Section 6.6-2 of the Greenbook (*Standard Specifications for Public Works Construction*) regarding archaeological and paleontological discoveries, if a discovery is made of items of archaeological or paleontological interest, the Contractor shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Engineer. When resumed, excavation operations within the area of discovery shall be as directed by the Engineer.

3.6.5 Project Design Features

PDF-CUL-1: A qualified archeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall be retained before the project construction and shall remain on-call during all

ground-disturbing activities. The qualified archaeologist shall ensure that a Worker Environmental Awareness Protection (WEAP) training, presented by the qualified archaeologist and Native American representative, is provided to all construction and managerial personnel involved with the project. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural resources and outline regulatory requirements for the protection of cultural resources. The WEAP shall also cover the proper procedures to be followed in the event of an unanticipated cultural resource discovery during construction. The WEAP training can be in the form of a video or PowerPoint presentation or printed literature (handouts) that can be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

PDF-CUL-2: In the event of an inadvertent discovery of archaeological materials, the resource shall be fully documented by the qualified archaeologist or designee and a Department of Parks and Recreation (DPR) 523 record shall be prepared. If prehistoric or potential tribal cultural resources are identified, the consulting Native American Tribes shall be notified.

The qualified archaeologist, in consultation with consulting Native American Tribes and the City of Los Angeles, shall determine whether the resource is potentially significant as per CEQA (i.e., whether it is a historical resource, a unique archaeological resource, or tribal cultural resources). If preservation in place or avoidance is not feasible, the qualified archaeologist, in consultation with the City, shall prepare and implement a detailed treatment plan. Treatment of unique archaeological resources shall follow the applicable requirements of Public Resources Code (PRC) Section 21083.2. Treatment for most resources would consist of, but would not be limited to, in-field documentation, archival research, subsurface testing, excavation, and preparation of a final report and DPR 523 record. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of the final report and DPR 523 record(s) to the City of Los Angeles and South Central Coastal Information Center.

3.6.6 Mitigation Measures

MM-PAL-1: A qualified paleontological monitor (i.e., one who meets the qualification standards established by the Society of Vertebrate Paleontology [SVP, 2010]) shall be retained prior to construction and shall remain on call during all ground disturbing activities. Worker Environmental Awareness Program (WEAP) training shall be provided to all construction and managerial personnel involved with the project's ground disturbing activities. The WEAP training shall provide an overview of

paleontological resources and outline the regulatory requirements for their protection. The WEAP shall also cover the proper procedures to be followed in the event of a fossil discovery during construction. The WEAP training may be in the form of a video or PowerPoint presentation or printed literature (handouts) that can be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

- MM-PAL-2:** The qualified paleontological monitor will monitor project-related excavation activities in high paleontological deposits if encountered in the subsurface. Project-related excavation activities greater than 5 feet depth shall be monitored on a part-time (i.e., spot-checking) basis to check for the presence of underlying paleontologically sensitive sediments. If paleontologically sensitive deposits are observed, full-time monitoring shall be implemented in those areas. Excavations determined to be entirely within previously disturbed sediments or late Holocene-age deposits do not require paleontological monitoring or continued spot-checking.
- MM-PAL-3:** In the unanticipated event that fossil resources are discovered, they shall be protected from further excavation, destruction, or removal. Work shall be halted within 25 feet of the discovery until it can be evaluated by a qualified paleontologist (i.e., one who meets the SVP professional standards for Principal Investigator or Project Paleontologist). If determined to be scientifically important, the paleontological resources shall be recovered, prepared to the point of curation, identified, and curated at the Natural History Museum of Los Angeles County or another accredited repository along with associated field data.
- MM-PAL-4:** After ground-disturbing activities are completed, a memo report documenting the methods and results of paleontological monitoring shall be prepared by the qualified paleontologist and submitted to the City of Los Angeles.

As such, impacts on cultural resources would be less than significant with compliance with SCs, implementation of PDFs, and the incorporation of mitigation measures.

3.7 Energy

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An Energy Impact Assessment Technical Memorandum (TAHA, 2022) was prepared for the project and is provided in Appendix D. The findings of the memo are summarized below.

3.7.1 Regulatory Setting

This section describes existing laws and regulations related to energy that apply to the project.

3.7.1.1 Federal

Energy Policy and Conservation Act

The Energy Policy and Conservation Act was enacted to serve the nation's energy demands and promote conservation methods when feasibly obtainable. This Act mandated vehicle economy standards, extended oil price controls to 1979, and directed the creation of a strategic petroleum reserve.

Alternative Motor Fuels Act of 1988

The Alternative Motor Fuels Act amended a portion of the Energy Policy and Conservation Act to encourage the use of alternative fuels, including electricity. This Act directed the Secretary of Energy to ensure that the maximum practicable number of federal passenger automobiles and light-duty trucks be alcohol-powered vehicles, dual-energy vehicles, natural gas-powered vehicles, or natural gas dual-energy vehicles. This Act also directed the Secretary of Energy to conduct a study regarding such vehicles' performance, fuel economy, safety, and maintenance costs and report to Congress the results of a feasibility study concerning the disposal of such alternative-fueled federal vehicles.

Energy Policy Act

The Energy Policy Act reduces dependence on imported petroleum and improves air quality by addressing all aspects of energy supply and demand, including alternative

fuels, renewable energy, and energy efficiency. This Act encourages the use of alternative fuels through both regulatory and voluntary activities and the approaches carried out by the U.S. Department of Energy. It requires federal, state, and alternative fuel provider fleets to acquire alternative fuel vehicles. The Department of Energy's Clean Cities Initiative was established in response to the Energy Policy Act of 1992 to implement voluntary alternative fuel vehicle deployment activities.

The Energy Policy Act (2005) necessitated the development of grant programs, demonstration and testing initiatives, and tax incentives that promote alternative fuels and advanced vehicles production and use. This Act also amends existing regulations, including fuel economy testing procedures and Energy Policy Act of 1992 requirements for federal, state, and alternative fuel provider fleets.

Energy Independence and Security Act

The Energy Independence and Security Act consists of provisions designed to increase energy efficiency and the availability of renewable energy. Key provisions of this Act include:

- The Corporate Average Fuel Economy (CAFE), which sets a target of 54.5 miles per gallon for the combined fleet of cars and light trucks by the model year 2025.
- The Renewable Fuels Standard, which sets a modified standard that starts at 9.0 billion gallons in 2008 and rises to 36 billion gallons by 2022.
- The Energy Efficiency Equipment Standards, which includes a variety of new standards for lighting and residential and commercial appliance equipment.
- The Repeal of Oil and Gas Tax Incentives, which includes the repeal of two tax subsidies to offset the estimated cost to implement the CAFE provision.

3.7.1.2 State

Senate Bills 1078

Senate Bill (SB) 1078 (Public Utilities Code [PUC] Chapter 2.3, Sections 387, 390.1, and 399.25) implemented a California Renewable Portfolio Standard, which established a goal that 20 percent of the energy sold to customers be generated by renewable resources by 2017. The goal was accelerated in 2006 under SB 107 and expanded in 2011 under SB 2, which required electric service providers and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020.

Senate Bill 1389

The California Energy Commission (CEC) is responsible for, among other things, forecasting future energy needs for the state and developing renewable energy resources and alternative renewable energy technologies for buildings, industry, and transportation. SB 1389 (PRC Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report, assessing major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors. The

report is also intended to provide policy recommendations to conserve resources, protect the environment, and ensure reliable, secure, and diverse energy supplies. The 2019 Integrated Energy Policy Report, required under SB 1389, was adopted on February 20, 2020.

Assembly Bill 2076, Reducing Dependence on Petroleum

The CEC and CARB are directed by Assembly Bill (AB) 2076 (passed in 2000) to develop and adopt recommendations for reducing dependence on petroleum. A performance-based goal in AB 2076 is to reduce petroleum demand to 15 percent less than 2003 demand by 2020.

Senate Bill 375

SB 375 was adopted with the goal of reducing greenhouse gas (GHG) emissions from cars and light trucks. Each metropolitan planning organization (MPO) across California is required to develop a sustainable communities strategy (SCS) as part of its regional transportation plan (RTP) to meet the region's GHG emissions reduction target. The 2020–2045 RTP/SCS prepared by the SCAG includes commitments to reduce emissions from transportation sources to comply with SB 375. This is anticipated to indirectly reduce fuel energy consumption.

California Buildings Standard Code – Title 24 Standards

The CEC first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. The standards are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods. The standards require that enforcement agencies determine compliance with CCR Title 24, Part 6 before issuing building permits for any construction.

California Buildings Standard Code – Green Building Standards

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to improve public health by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, including energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

Innovative Clean Transit Regulation

The Innovative Clean Transit (ICT) regulation was adopted in December 2018 and requires all public transit agencies to gradually transition to a 100 percent zero-emission bus (ZEB) fleet. Beginning in 2029, 100% of new purchases by transit agencies must be ZEBs, with a goal for the full transition by 2040. It applies to all

transit agencies that own, operate, or lease buses with a gross vehicle weight rating (GVWR) greater than 14,000 lbs. It includes standard, articulated, over-the-road, double-decker, and cutaway buses. A ZEB Rollout Plan is required from each transit agency, approved by its Board, to show how it is planning to achieve a full transition to zero-emission technologies by 2040. LADOT Transit published its Rollout Plan in October 2020.

3.7.1.3 Local

GreenLA – An Action Plan to Lead the Nation in Fighting Global Warming

On May 15, 2007, Los Angeles Mayor Antonio Villaraigosa released the GreenLA Plan that has an overall goal of reducing the City of Los Angeles' GHG emissions by 35 percent below 1990 levels by 2030. This goal exceeds the targets set by both California and the Kyoto Protocol and is the greatest reduction target of any large United States city. The cornerstone of the GreenLA Plan is increasing the City's use of renewable energy to 35 percent by 2020.

City of Los Angeles Sustainability pLAn

On April 8, 2015, Mayor Eric Garcetti released the Los Angeles Sustainability pLAn, a roadmap to achieve back-to-basics short-term results while setting the path to strengthen and transform the City. The pLAn is made up of short-term (by 2017) and longer-term (by 2025 and 2035) targets in 14 categories to advance the City's environment, economy, and equity. In 2019, Mayor Eric Garcetti released an update to the pLAn (LA's Green New Deal), which accelerates previous sustainability targets and looks even further out to 2050. One provision of L.A.'s Green New Deal is the achievement of an entirely zero-emission bus fleet by the year 2030, which was adopted by the Los Angeles City Council in November 2017 (Council File 17-0739).

L.A.'s Green New Deal is an expanded vision for the Sustainability pLAn for achieving clean air and water and a stable climate in the City (through a zero-carbon grid, zero-carbon transportation, zero-carbon buildings, zero waste, and zero wasted water). It is intended to serve as a guide for creating an equitable and abundant economy in the City, powered by 100% renewable energy. It seeks to build the country's largest, cleanest, and most reliable urban electrical grid to power the next generation of green transportation and clean buildings; educate and train Angelenos to participate in the new green economy; and enact sustainable policies that prioritize economic opportunity.

Los Angeles Green Building Code

The City's Green Building Code applies to new buildings and alterations with building valuations over \$200,000 (residential and non-residential). The Green Building Code is based on the 2010 California Green Building Standards Code Title 24, Part 11, commonly known as CalGreen, that was developed and mandated by the state to attain consistency among the various jurisdictions within the state, reduce the building's energy and water use, and reduce waste.

LADWP Power Strategic Long-Term Resource Plan

The 2017 Power Strategic Long-Term Resource Plan (SLTRP) is a 20-year roadmap that guides the LADWP power system in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. One of the main focuses of the SLTRP is to reduce GHG emissions while maintaining cost-competitive rates and reliable electric service. The SLTRP examines multiple strategies to reduce GHG emissions, including early coal replacement, accelerated renewable portfolio standard, energy efficiency, local solar, energy storage, and transportation electrification.

As LADWP starts to investigate, study, and determine the investments needed for a 100 percent clean energy portfolio, the 2017 SLTRP provides a path towards this goal with a combination of GHG reduction strategies, including early coal replacement two years ahead of schedule by 2025; accelerating renewable portfolio standard (RPS) to 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036; doubling of energy efficiency from 2017 through 2027; repowering coastal in-basin generating units with new, highly efficient potential clean energy projects by 2029 to provide grid reliability and critical ramping capability, accelerating electric transportation to absorb GHG emissions from the transportation sector, and investing in the Power System Reliability Program to maintain a robust and reliable power system.

3.7.2 Existing Environment

Electricity

Existing power and electrical services in the City are provided by the Los Angeles Department of Water and Power (LADWP), which supplies more than 26 million megawatt hours (MWh) of electricity per year for its 1.54 million residential and business customers (Los Angeles Department of Water and Power 2021). LADWP has more than 8,009 megawatts of net dependable generation capacity. Of LADWP's total power resources, about 34 percent are from renewable sources, 27 percent from natural gas, 14 percent from nuclear, 21 percent from coal, and 3 percent from large hydroelectric. About 70 percent of the electricity in the City is consumed by business and industry, with the remaining 30 percent of residents averaging about 500 kilowatt hours of usage per month.

Transportation Fuels

In California, the transportation sector is the state's largest energy consumer, due to high demand from California's many motorists, major airports, and military bases. The majority of transportation energy is currently derived from a wide variety of petroleum products. Automobiles and trucks consume gasoline and diesel fuel. The transportation sector consumes relatively minor amounts of natural gas or electricity but propelled mainly by air quality laws and regulations, technological innovations in transportation are expected to increasingly rely on compressed natural gas and electricity as energy sources. Energy consumption by on-road motor vehicles reflects the types and numbers of vehicles, the extent of their use (typically described in terms of VMT), and their fuel economy (typically described in terms of miles per gallon [mpg]).

Although California's population and economy are expected to continue to grow, gasoline demand is projected to decline from roughly 15.8 billion gallons in 2017 to between 12.3 and 12.7 billion gallons in 2030, a reduction of 20 to 22 percent (California Energy Commission 2017). This decline is due to both increasing vehicle electrification and higher fuel economy for new gasoline vehicles.

3.7.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Reference: L.A. CEQA Thresholds Guide (2006) (Section M.4); LADWP Power Facts and Figures; CalEEMod; California Energy Consumption Database; Energy Impact Assessment (TAHA 2022).

Comment: A significant impact would occur if the project construction or operation required wasteful, inefficient, or unnecessary consumption of energy resources.

Less than significant impact. The project would involve the construction and operational energy consumption of electricity and transportation fuels. The proposed project would not use natural gas for construction or operations.

Construction

Regarding electricity, the proposed project would use small pieces of equipment powered by diesel-powered generators that are accounted for in the petroleum-based fuels analysis for construction. Equipment would not be plugged into the electric grid. Construction activities would not require the consumption of electricity.

Transportation fuels would be consumed for construction equipment, worker trips to and from construction sites, material delivery and disposal trips, and loading demolition debris into trucks. Off-road equipment diesel fuel consumption was estimated based on fuel consumption factors in the CARB OFFROAD model and on-road vehicle fuel consumption was estimated using CO₂ emissions from CalEEMod output and fuel carbon content conversion factors from the USEPA GHG inventory emission factor database.

The analysis determined that off-road equipment would consume approximately 50,447 gallons of diesel fuel and that on-road diesel trucks would consume approximately 7,860 gallons of diesel fuel during the two-year construction period, averaging approximately 29,153 gallons per year for the combined end uses. Additionally, construction worker commuting would require approximately 16,884 gallons of motor gasoline over the two-year period, or 8,442 gallons annually on average.

The CEC estimates that the overall consumption of transportation fuel in California was 15.8 billion gallons in 2017 and would be between 12.3 and 12.7 billion gallons by 2030. According to CEC data, in 2019 Los Angeles County retail sales of petroleum fuels were approximately 3,559 million gallons of motor gasoline and 276 million gallons of diesel fuel. Therefore, the construction of the proposed project would increase countywide motor gasoline consumption by approximately 0.0002 percent and countywide diesel fuel consumption by approximately 0.01 percent for two years. These incremental increases in fuel consumption would be practically negligible and would not disproportionately burden the commercially available fuel reserves within Los Angeles County such that additional fuels would need to be refined.

The selected construction contractors would use a fleet of fuel-efficient vehicles compliant with state regulations for all work that would be required under the proposed project, which would minimize the demand for transportation fuels. As such, equipment and vehicles utilized in construction activities would also be subject to compliance with all statewide and local regulations on the efficient use of transportation fuels (such as the CARB Airborne Toxics Control Measure [Title 13, California Code of Regulations, Section 2485] and Off-Road Diesel Regulation).

Therefore, the proposed project would not result in a wasteful, inefficient, and unnecessary usage of energy; result in a substantial increase in energy demand that would affect local or regional energy supplies; or require additional capacity or infrastructure to meet increased demand. As a result, transportation fuel impacts during construction would be less than significant.

Operations

Operation of the proposed project is anticipated to begin in mid-2026 and the primary end uses of energy resources would include petroleum-based transportation fuels consumption for vehicle trips to and from the EBMF and electricity consumption associated with standard building operations as well as BEB charging. The CARB EMFAC model was used to derive aggregate fleet average fuel consumption factors for Los Angeles County vehicles in 2026. According to the Transportation/Traffic Impact Analysis (Parsons, 2022), the proposed project would generate approximately 759 daily vehicle trips and 6,271 daily VMT attributed to employee commuting. Extrapolating the daily VMT over an entire year, annual EBMF operations would produce approximately 2,288,915 VMT and consume approximately 63,673 gallons of motor gasoline and 2,836 gallons of diesel fuel. These fuel consumption rates would represent an increase of approximately 0.002 percent of countywide motor gasoline consumption and 0.001 percent of countywide diesel fuel consumption.

Electricity to the project site would be provided by LADWP. The CalEEMod output and BEB charging analysis determined that typical facility lighting and power would require approximately 1,095 MWh and BEB charging would require approximately 6,935 MWh per year. The proposed project's peak electricity demand would be no more than 8 MW, and the LADWP capacity is approximately 8,000 MW with an instantaneous peak demand of 6,502 MW experience in August 2017. There is more than sufficient capacity within the existing LADWP infrastructure to support the implementation of the

proposed project and its peak and sustained electricity requirements. Additionally, an on-site solar PV renewable energy installation would offset some of the EBMF electricity demands.

Reductions in energy use at the site would also occur with the cessation of industrial activities due to the proposed demolition of the existing warehouse buildings on-site. Additionally, LADOT Transit operations at the Compton Facility would no longer occur once the proposed project is fully operational, eliminating energy resource consumption from 669 daily vehicle trips commuting to the South Yard as well as building energy use. Eventually, implementation of the proposed project would indirectly reduce regional CNG and propane demands associated with the existing Compton Facility fleet bus travel. Operation of the proposed project would not result in wasteful or inefficient use of transportation fuels and would not place a disproportionate burden on existing commercially available reserves.

Therefore, the proposed project would not result in the wasteful, inefficient, and unnecessary usage of energy or a substantial increase in energy demand that would affect local or regional energy supplies. Impacts would be less than significant and no mitigation is required.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Reference: L.A. CEQA Thresholds Guide (2006) (Section M.4); LA's Green New Deal; SLTRP; Final 2019 Integrated Energy Policy Report; GreenLA Plan; Energy Impact Assessment (TAHA 2022).

Comment: A significant impact would occur if the project conflicted with or obstructed a state or local plan for renewable energy or energy efficiency.

Less than significant impact. Energy legislation, policies, and standards adopted by California and local governments were enacted and promulgated to reduce energy consumption and improve efficiency (i.e., reducing the wasteful and inefficient use of energy). Therefore, for this analysis, wasteful, inefficient, or unnecessary are defined as circumstances in which the proposed project would conflict with applicable State or local energy legislation, policies, and standards or result in increased per capita energy consumption. Accordingly, inconsistency with legislation, policies, or standards designed to avoid wasteful, inefficient, and current citywide average, is used to evaluate whether the proposed project would result in a significant impact related to energy resources and conservation.

As discussed above, the implementation of the proposed project would not produce a peak electricity demand that would overburden the existing capacity of LADWP's infrastructure. In addition, the implementation of the proposed project would not place an undue burden on the existing petroleum-based transportation fuel supply. Although the proposed project would utilize electricity and transportation fuels, the project would support the LADOT conversion to an all-electric bus fleet in accordance with CARB's ICT regulation and would reduce City reliance on nonrenewable energy sources,

consistent with the goals of the City's Green LA and Sustainable City pLAn. The project would also be built in compliance with the City's Green Building Code and CALGreen and would provide an on-site PV installation to reduce the demand for energy resources from LADWP.

Furthermore, the operation of the proposed project would eventually displace the existing Compton Facility operations, which would lower the net electricity demand and nonrenewable petroleum-based fuels consumption. Thus, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant and no mitigation is required.

3.8 Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A Soils and Geology Technical Memorandum (Parsons, 2022) was prepared for the project and is provided in Appendix E. The findings of the memo are summarized below.

3.8.1 Regulatory Setting

This section describes existing laws and regulations related to geology and soils that apply to the project.

3.8.1.1 Federal

The Historic Sites Act of 1935 establishes a national registry of natural landmarks and protects “outstanding examples of major geological features.”. The project site is not included in a Historic Site registry and there are no major geologic features on the site. No federal regulations that specifically address impacts related to geology and soils and apply to the project.

3.8.1.2 State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) (California Public Resources Code, Division 2, Chapter 7.5) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The main purpose of the Alquist-Priolo Act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. Through the facilitation of seismic retrofitting to strengthen existing buildings, including historical buildings, against ground shaking, policies and criteria are also intended to provide citizens with increased safety and to minimize the loss of life during and immediately following earthquakes.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) was passed in 1990 to address non-surface fault rupture earthquake hazards, including liquefaction and seismically induced landslides. The purpose of SHMA is to reduce threats to public health and safety and to minimize property damage caused by earthquakes, strong ground shaking, liquefaction, landslides, or other hazards caused by earthquakes. This Act requires the State Geologist to delineate various seismic hazard zones, and cities, counties, and other local permitting agencies to regulate certain development projects within these zones. The State Geologist has established regulatory zones (Zones of Required Investigation) and issued appropriate maps (Seismic Hazard Zone maps).

California Building Code

CCR Title 24 is the California Building Code (CBC), which is a compilation of building standards for the design, construction, quality of materials, use occupancy, location, and maintenance of all buildings and structures. The CBC serves as the basis for the design, construction, alteration, movement, replacement, and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California, except for modifications to the standards, as adopted by State agencies and local governing bodies.

The CBC requires the preparation of engineering geologic reports, supplemental ground-response reports, and/or geotechnical reports for all new construction; new structures on existing sites; and alterations to existing buildings. It also includes seismic

design criteria and requirements for use in the structural design of buildings (i.e., based on seismic hazard maps and the seismic design category) and specifies building components that require special seismic certification.

3.8.1.3 Local

City of Los Angeles General Plan Safety Element

The City's General Plan Safety Element, which was adopted in 1996, addresses public safety risks due to natural disasters, including seismic events and geologic conditions; and sets forth guidance for emergency response during such disasters. The Safety Element also provides generalized maps of areas within the City of Los Angeles that are considered susceptible to earthquake-induced hazards, such as fault rupture and liquefaction.

Los Angeles Building Code

Chapter XI of the Los Angeles Municipal Code (LAMC) is the Los Angeles Building Code, which adopts by reference the California Building Standards Code. It requires compliance with the Code regulations and the recommendations of an approved geotechnical report to address site-specific soil conditions, fill placement, load-bearing requirements, foundations, and other geologic and seismic factors to ensure structural integrity.

3.8.2 Existing Environment

Regional Geology

The project site is located within the Los Angeles Coastal Plain, which is bounded by mountain ranges to the north and east, by the Palos Verdes Hills to the southwest, and by the Pacific Ocean to the south and west. Specifically, the project site lies within the Rosecrans Hills physiographic region in the central portion of the Los Angeles Coastal Plain, between the Baldwin Hills to the north and the Dominguez Hills to the south.

According to the United States Geological Survey (USGS) topographic map for the Inglewood quadrangle, the topographic gradient in the vicinity of the project site is generally flat with a slight slope toward the northeast. The project site is approximately 107 feet above mean sea level (ft amsl). The site is within the Rosecrans Hills region, which is underlain by Upper Pleistocene sediments. Based on the Natural Resources Conservation Service (NRCS) soil survey data, the dominant soil composition in the project area is Urban Land-Biscailuz-Hueneme. Loam, clay loam, and sand may also be present in the general area of the site.

On-Site Geology

The project area is located in the northern section of the Peninsular Ranges Geomorphic Province, which consists of northwest-southeast-trending, fault-bounded discrete blocks, with mountain ranges, broad intervening valleys, and low-lying coastal plains that extend approximately 125 miles from the Transverse Ranges and the Los Angeles Basin south to the Mexican border, extending southward approximately 775 miles to the tip of Baja California.

Geologic mapping shows the project area is entirely underlain by Holocene-age alluvial gravel, sand, and clay. While not mapped within the project area, Pleistocene-age older alluvium is mapped within a half-mile of the project site and thus, is likely present in the project site at depth. Additionally, the site is developed, and artificial fill is likely present near the surface in previously disturbed portions of the site.

As part of the Phase II ESA and Additional Site Assessment fieldwork, 26 soil borings were advanced at the project site to depths ranging from 15 to 30.5 feet below ground surface (bgs). The boring logs show the upper 10 to 25 feet of soil beneath the project site consists of fine-grained, loose, dry, poorly-graded sands. This is underlain by 5 to 15 feet of medium dense, moist, low plasticity silty sand. The final 5-15 feet of soils observed consisted of fine-grained, loose to very loose, dry to moist, poorly graded sands. The actual thicknesses of these three primary soil types varied throughout the project site, however, the least amount of silty sand was observed in the center of the project site. In several of the borings on the northern portion of the project site, an approximately 5-foot interval of soft, medium plasticity silt, with clay, was observed between 7.5 and 12.5 feet bgs. This silt layer was not observed in any of the central and southern borings.

3.8.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project expose people or structures to 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?*

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.1); Zone Information and Map Access System (ZIMAS); California Geological Survey Special Publication 42 (DOC, 2018); NavigateLA; Earthquake Zones of Required Investigation for the Inglewood Quadrangle; Southeast Los Angeles Community Plan; Geology and Soils Analysis (Parsons, 2022).

Comment: Based on the criteria established in the L.A. CEQA Thresholds Guide, a significant impact may occur if the project were located within a State-designated Alquist-Priolo Zone or another designated fault zone.

Less than significant impact. Based on the most recently available studies and past fault mapping, the project site is not located within a designated Earthquake Fault Zone (Alquist-Priolo Special Studies Zone). No surface faults are known to pass through or project towards the site. The closest known active fault with a mappable surface expression is the Avalon-Compton fault of the Newport-Inglewood-Rose Canyon fault zone, which is located approximately 1.3 miles southwest of the site.

All new structures are required to adhere to the most current building standards of the LAMC and Los Angeles Building Code (LABC), which adopts California Building Code (CBC) standards by reference, with local amendments (SC-GEO-1). Adherence to the LAMC and LABC requirements, including the use of LABC seismic standards as the minimum seismic-resistant criteria, would ensure the structural integrity of all structures.

The project would not directly or indirectly lead to the risk of loss, injury, or death involving the rupture of a known earthquake fault as the project site is not located within a designated fault zone. Thus, hazards due to ground surface rupture are considered low and impacts related to surface rupture would be less than significant.

ii) Strong seismic ground shaking?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.1); ZIMAS; California Geological Survey Special Publication 42 (DOC, 2018); NavigateLA; Earthquake Zones of Required Investigation for the Inglewood Quadrangle; Southeast Los Angeles Community Plan; Geology and Soils Analysis (Parsons, 2022).

Comment: A significant impact could occur if the project were to result in an increased risk to public safety or destruction of property by exposing people, property, or infrastructure due to seismically induced ground-shaking hazards that are greater than the average risk associated with other locations in Southern California. The intensity of ground shaking depends primarily on the earthquake's magnitude, the distance from the source, and the site response characteristics.

Less than significant impact. The project site is located within the seismically active Southern California region and therefore, could be subject to seismic ground motion. While the project site is not located in a designated earthquake fault zone, there is a potential for hazards associated with strong seismic ground shaking during earthquake events throughout the region. The proposed buildings would be subject to ground shaking and potential risk of injury to users due to strong seismic ground shaking.

The demolition of the existing buildings and the construction of new buildings and structures would be required to adhere to all current building code requirements, including the LABC. The proposed project would be designed and constructed in accordance with state and local codes and the recommendations of the geotechnical investigation for the project, as outlined in SC-GEO-1. The project plans and specifications shall also be reviewed by a qualified Geotechnical Engineer to ensure proper implementation and application of the required building and seismic codes, as stated in SC-GEO-2. The project design and adherence to the regulatory requirements and federal, state, and local regulations would ensure that impacts related to seismic ground shaking would be less than significant.

Standard Conditions

The following Standard Conditions shall be implemented, as standard measures for compliance with existing regulations:

SC-GEO-1: In accordance with the Los Angeles Municipal Code (LAMC) and Los Angeles Building Code (LABC), a geotechnical investigation shall be prepared to assess site-specific geologic conditions, including the potential for liquefaction, soil expansion, and other geologic hazards at the project site. Applicable standards in the LABC and the recommendations of the geotechnical investigation shall be incorporated into the design and construction of the project.

SC-GEO-2: The project plans and specifications shall be reviewed by a qualified Geotechnical Engineer to ensure proper implementation and application of the required building and seismic codes. Additionally, all grading, excavation, and earthwork activity should be performed under the observation and testing of a qualified Geotechnical Engineer during the following stages:

- Site grading
- Excavation activities
- Any other ground-disturbing activities
- When any unusual or unexpected geotechnical conditions are encountered.

As such, impacts related to seismic ground shaking would be less than significant, which would be ensured by compliance with SC-GEO-1 and SC-GEO-2. No mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.1); ZIMAS; California Geological Survey Special Publication 42 (DOC, 2018); NavigateLA; Earthquake Zones of Required Investigation for the Inglewood Quadrangle; Southeast Los Angeles Community Plan; Geology and Soils Analysis (Parsons, 2022).

Comment: A significant impact would occur if the proposed project were in an area identified as having a high risk of liquefaction and appropriate design measures required within such designated areas were not incorporated into the project.

Less Than Significant Impact. Liquefaction zones are areas that have a historical occurrence of liquefaction, or local geological, geotechnical, and groundwater conditions that indicate a potential for permanent ground displacements to occur. Liquefaction occurs when water-saturated sediments are subjected to extended periods of shaking. Pressure increases in the soil pores temporarily alter the soil state from solid to liquid. Liquefied sediments lose strength, in turn causing the failure of adjacent infrastructure, including bridges and buildings. Whether a soil would resist

liquefaction depends on many factors, including grain size, compaction and cementation, saturation and drainage, characteristics of the vibration, and the occurrence of past liquefaction. Granular, unconsolidated, saturated sediments are the most likely to liquefy, while dry, dense, or cohesive soils tend to resist liquefaction. Liquefaction is generally considered to be a hazard where the groundwater is within 40 to 30 feet of the ground surface. Without proper soil drainage, the pore pressure, which builds up when ground motion shakes unconsolidated soil, would be more easily dissipated; thus, soils with proper drainage are less likely to liquefy.

The project site is located within a potential liquefaction hazard zone per the Earthquake Zones of Required Investigation for the Inglewood Quadrangle (CGS, 1999) and is within a City-designated liquefaction area. However, the project site has a low potential for liquefaction due to the absence of groundwater at 40 feet or less bgs (i.e., groundwater is estimated at approximately 60 feet bgs or lower at the site) and the presence of non-liquefiable clayey soils at some depths beneath the site.

The proposed demolition and construction activities would be required to adhere to all current building code requirements, including the LABC. As stated in SC-GEO-1, a geotechnical investigation, including liquefaction and seismic settlement analyses, would be performed before construction activities to assess the potential for liquefaction based on soil types beneath the project site and the project would incorporate geotechnical recommendations to address potential geologic hazards at the site, including liquefaction. The project plans and specifications shall also be reviewed by a qualified Geotechnical Engineer to ensure proper implementation and application of the required building and seismic codes, as stated in SC-GEO-2.

The project would not exacerbate existing environmental conditions and would not directly or indirectly cause substantial adverse effects involving seismic-related ground failure, including liquefaction. The project design and adherence to the regulatory requirements and state and local regulations would ensure that impacts related to ground failure and liquefaction would be less than significant. No mitigation is required.

iv) Landslides?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.1); ZIMAS; California Geological Survey Special Publication 42 (DOC, 2018); City of Los Angeles General Plan Safety Element Exhibit C; Southeast Los Angeles Community Plan; USGS Topographic Map for the Inglewood Quadrangle; Geology and Soils Analysis (Parsons, 2022).

Comment: A significant impact could occur if the project site is in an area identified as having a high risk of landslides.

No impact. Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes. Landslide zones are areas where landslide movement has previously occurred, or where local topographic, geological, geotechnical, and subsurface water conditions indicate the potential for permanent

ground displacement. The project site is located on relatively flat terrain. There are no historic occurrences of landslides in the project site's vicinity, according to the California Landslide Inventory maintained by the Department of Conservation. According to the Earthquake Zones of Required Investigation for the Inglewood Quadrangle, the project site is outside of mapped Earthquake-Induced Landslide Zones. Thus, the probability of landslides occurring within or near the project site is very low due to the general lack of elevation difference in slope geometry across or adjacent to those portions of the project site. Additionally, the project site is not identified within a City-designated hillside area or earthquake-induced hillside area. Also, project construction and operation are not anticipated to exacerbate existing or future potential for landslides to occur. Therefore, the project would not increase the risk of loss, injury, or death involving landslides. No impacts related to landslides would occur and no mitigation is required.

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

Reference: L.A. CEQA Thresholds Guide (Section E.2); USGS Topographic Map for the Inglewood Quadrangle; Geology and Soils Analysis (Parsons, 2022).

Comment: The project could have significant sedimentation or erosion impacts if it were to (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation resulting in sediment runoff or deposition that would not be contained or controlled on the project site.

Less than significant impact. The proposed project would include ground-disturbing activities, such as excavation, grading, compaction of soil, and paving. These activities could result in the potential for erosion to occur at the project site, although soil exposure would be temporary and short-term in nature. During construction, BMPs would be implemented to minimize soil erosion and runoff, as required under the NPDES Construction General Permit (SC-HYD-1). As stated in SC-GEO-2, all grading, excavation, and earthwork activity would be performed under the observation and testing of a qualified Geotechnical Engineer during ground-disturbing activities. The project design and the adherence to state and local regulations would ensure impacts related to soil erosion would be less than significant.

Additionally, the project site would be largely covered by pavement and buildings after construction. No large areas of exposed soil would exist that would be exposed to the effects of erosion by wind or water. Due to the implementation of standard engineering practices, BMPs, and paved areas at the project site, the project would not have significant sedimentation or erosion impacts which would constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or would accelerate natural processes of wind and water erosion and sedimentation resulting in sediment runoff or deposition that would not be contained or controlled on the project site. As such, the proposed project would have less than significant impact on erosion and loss of topsoil. No mitigation is required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Reference: L.A. CEQA Thresholds Guide (Section E.1); Phase I ESA, Phase II ESA and Additional Site Assessment Report (Stantec, 2019)' Geology and Soils Analysis (Parsons, 2022).

Comment: The project could have a significant impact if it is built in an unstable area without proper site preparation, or were to cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or if it were to expose people to a substantial risk of injury.

Less than significant impact. One of the major types of liquefaction-induced ground failure is the lateral spreading of mildly sloping ground. Lateral spreading involves primarily the side-to-side movement of earth materials due to ground shaking and is evidenced by near-vertical cracks to the predominately horizontal movement of the soil mass involved. As discussed above in Section 3.7.3 question (a)(iii.), the project site is located within potential liquefaction hazard zones per the Earthquake Zones of Required Investigation for the Inglewood Quadrangle (CGS, 1999) and per the City-designated liquefaction area. The project site appears to have a low potential for liquefaction due to the absence of groundwater at 40 feet or less bgs (i.e., groundwater is estimated at approximately 60 feet bgs or lower at the site) and the presence of non-liquefiable clayey soils at some depths. However, under SC-GEO-1, a geotechnical investigation, including liquefaction and seismic settlement analyses, would be performed before construction activities to further assess the potential for on-site geologic hazards (e.g., liquefaction) based on soil types beneath the project site. The demolition and construction activities would be required to adhere to all current building code requirements, including the LABC, which incorporates current seismic design provisions from the CBC (SC-GEO-1). The project plans and specifications shall also be reviewed by a qualified Geotechnical Engineer to ensure proper implementation and application of the required building and seismic codes, as stated in SC-GEO-2. The project's design, adherence to the regulatory requirements, and federal, state, and local regulations would ensure impacts related to liquefaction would be less than significant.

Subsidence is the lowering of surface elevation due to changes occurring underground, such as the extraction of large amounts of groundwater, oil, or gas. When groundwater is extracted from aquifers at a rate that exceeds the rate of replenishment, overdraft occurs, which can lead to subsidence. However, the project does not anticipate the extraction of groundwater, oil, or gas from the project site nor is the project site located in an area where that extraction is occurring. Therefore, no impacts related to subsidence would occur.

Collapsible soils consist of loose dry materials that collapse and compact under the addition of water or excessive loading. Collapsible soils are prevalent throughout the southwestern United States, specifically in areas of young alluvial fans. Soil collapse

occurs when the land surface is saturated at depths greater than those reached by typical rain events. According to the Phase I ESA and Phase II ESA and Additional Site Assessment Report, the subsurface conditions at the project site generally consists of existing urban fill soils placed during previous site grading operations over poorly graded sands and silty sands, as encountered in the borings drilled to the maximum depth explored of approximately 30.5 feet bgs. The observed fill soils consist primarily of silty sands, clayey sands, and sandy clays. The depths of the fills were approximately 5 feet bgs. Under SC-GEO-2, all grading, excavation, and earthwork activity would be performed under the observation and testing of a qualified Geotechnical Engineer during the ground-disturbing activities. The project design and the adherence to state and local regulations would ensure impacts related to collapsible soils would be less than significant.

Additionally, the proposed project would be constructed in accordance with the latest version of the LABC and other applicable state and local codes relative to site-specific geologic and seismic hazards (SC-GEO-1). As such, impacts associated with on- or off-site landslides, lateral spreading, subsidence, and collapses would be less than significant.

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?

Reference: Phase I ESA, Phase II ESA, and Additional Site Assessment Report (Stantec, 2019); Geology and Soils Analysis (Parsons, 2022).

Comment: A significant impact may occur if the project were built on expansive soils without proper site preparation or design features, thereby posing a hazard to life and property.

Less than significant impact. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. Foundations constructed on expansive soils are subject to uplifting forces caused by the swelling. Without proper management, heaving and cracking of both building foundations and slabs on grade could result.

Soils encountered during the Phase II ESA and Additional Site Assessment activities consisted of sands and silty sands; however, no geotechnical investigation has been completed for the project site. Under SC-GEO-1, a geotechnical investigation should be completed at the project site to assess the potential need for mitigation of expansive soil. While expansive soils are not anticipated, if expansive soils are encountered at the excavation depth, as standard practice, on-site soils with an expansion index exceeding 20 should not be re-used for compaction within 5 feet below the planned finish grade or for retaining wall backfill. Soils containing organic materials should not be used as structural fill. The extent of removal should be determined by the Geotechnical Engineer based on soil observations made during grading. Any proposed import fill should have an expansion index of less than 20 and should be evaluated and approved by the Geotechnical Engineer before importing to the site (SC-GEO-2).

The project would construct several buildings and structures on the proposed site. Construction of the EBMF would be required to comply with the LABC, LAMC, and other applicable building codes (SC-GEO-1). Compliance with these existing regulations would ensure that the project would not exacerbate any existing soil conditions. Impacts would be less than significant, and no mitigation measures would be required.

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?

Reference: L.A. CEQA Thresholds Guide (Section E.3); Geology and Soils Analysis (Parsons, 2022).

Comment: A significant impact would occur if the proposed project were built on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems if such systems were proposed.

No impact. The construction and operation of the proposed project would not involve the use of septic tanks or alternative wastewater disposal systems. Infrastructure for the disposal of wastewater already exists at the project site as the existing buildings have active sanitary connections to the 8-inch sewer line on East 111th Place that is part of the City's public sewer system. The project would not use septic tanks or an on-site wastewater disposal system but would be connected to the same sewer line and public sewer system. Therefore, no impact associated with the use of alternative wastewater treatment systems would occur. No mitigation is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Reference: L.A. CEQA Thresholds Guide (Sections D.1 and E.3); City of Los Angeles General Plan Conservation Element; USGS Topographic Map for the Inglewood Quadrangle.

Comment: Based on the criteria established in the L.A. CEQA Thresholds Guide, a significant impact could occur if grading or excavation activities associated with the project were to disturb unique paleontological resources or unique geologic features that presently exist within the project site.

Less than significant impact with mitigation incorporated. The project site is within an urbanized area of the City. According to the Phase II ESA and Additional Site Assessment, the subsurface conditions at the project site generally consist of existing fill soils placed during previous site grading operations over sands and silty sands, as encountered in the borings drilled to the maximum depth explored of approximately 30.5 feet bgs. Native soils underlying the project site have the potential to contain sensitive paleontological resources that may be disturbed during excavation activities, as discussed in Section 3.6.3 checklist question d. Impacts on

paleontological resources would be less than significant with the implementation of MM-PAL-1 through MM-PAL-4.

The site has a relatively flat topography and there are no unique geologic features at the project site. Project excavation activities include shallow excavations for the installation of the EBMF building footings and supporting structures. No impact on unique geologic features would occur from the construction and operation of the project.

3.9 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Greenhouse Gas Emissions Impact Assessment Technical Memorandum (TAHA, 2021) was prepared for the project and is provided in Appendix F. The findings of the memo are summarized below.

3.9.1 Regulatory Setting

This section describes existing laws and regulations related to greenhouse gas emissions that apply to the project.

3.9.1.1 Federal

Massachusetts v. Environmental Protection Agency

The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO₂ and other GHGs are pollutants under the federal CAA, which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. On April 17, 2009, the USEPA issued a proposed finding that GHGs contribute to air pollution that may endanger public health or welfare. The USEPA stated that high atmospheric levels of GHGs “are the unambiguous result of human emissions and are very likely the cause of the observed increase in average temperatures and other climatic changes.” The USEPA further found that “atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the Clean Air Act.” The findings were signed by the USEPA Administrator on December 7, 2009.

Final Endangerment Finding

The USEPA adopted a Final Endangerment Finding for defined GHGs, as required before USEPA can regulate GHG emissions under Section 202(a)(1) of the CAA. USEPA also adopted a Cause or Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. These findings do not themselves impose any requirements on industry or

other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

Energy Independence and Security Act

The Energy Independence and Security Act (EISA) of 2007 facilitates the reduction of national GHG emissions by increasing the supply of alternative fuel sources, strengthening standards for energy conservation, and requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs. Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.” A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserves natural resources.

3.9.1.2 State

California has adopted many regulations to reduce statewide GHG emissions. The following provides a brief overview of regulations most relevant to the proposed project.

California Greenhouse Gas Reduction Targets

Executive Order (EO) S-3-05 created GHG emission reduction targets in California. The targets included reducing GHG emissions to 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050. The California Climate Action Team (CAT) was created to collectively and efficiently reduce GHG emissions. The CAT provides periodic reports to the Governor and Legislature on the status of GHG reductions in the State, as well as strategies for mitigating and adapting to climate change. The first CAT Report to the Governor and the Legislature in 2006 contained recommendations and strategies to help meet the targets in EO S-3-05. The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors.

EO B-30-15 directed State agencies to establish a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030. It also ordered State agencies to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets and directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

EO B-55-18 establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB worked with relevant agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

Assembly Bill 32 and Senate Bill 32

In 2006, the California State Legislature adopted Assembly Bill (AB) 32, which focuses on reducing GHG emissions in California to 1990 levels by 2020. It represents the first enforceable Statewide program to limit emissions of these GHGs from all major industries, with penalties for noncompliance. CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing State actions that would achieve GHG emissions reductions equivalent to 1990 Statewide levels by 2020.

To achieve these goals, which are consistent with the California CAT GHG targets for 2010 and 2020, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. To achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill, AB 197. SB 32 and AB 197 established a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and included provisions to ensure that the benefits of State climate policies reach disadvantaged communities. 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.

Climate Change Scoping Plan

AB 32 requires CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020. The 2008 Climate Change Scoping Plan proposes a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”

In the 2008 Climate Change Scoping Plan, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020, absent GHG-reducing laws and regulations). CARB originally used an average of the State’s GHG emissions from 2002 through 2004 and projected the 2020 levels at approximately 596 MMTCO₂e. Therefore, under the original projections, the State would have had to reduce its 2020 BAU emissions by 28.4 percent to meet the 1990 target of 427 MMTCO₂e.

Subsequent to the adoption of the 2008 Climate Change Scoping Plan, a lawsuit was filed challenging CARB’s approval of the Climate Change Scoping Plan Functional Equivalent Document. CARB updated the projected 2020 BAU emissions inventory

based on current economic forecasts and emission reduction measures already in place, replacing its prior 2020 BAU emissions inventory. CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7 percent (down from 28.5 percent) from BAU conditions. When the 2020 emissions level projection was also updated to account for newly implemented regulatory measures discussed above, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16 percent (down from 28.5 percent) from the BAU conditions.

The First Update to the Scoping Plan was approved by CARB in May 2014 and built upon the initial Scoping Plan with new strategies and recommendations. CARB revised the target and determined the 1990 GHG emissions inventory and 2020 GHG emissions limit to be 431 MMTCO_{2e}. CARB also updated the State's 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulations that had recently been adopted for motor vehicles and renewable energy. Under the first update to the Scoping Plan, the emission reductions necessary to achieve the 2020 emissions target of 431 MMTCO_{2e} would have been 78.4 MMTCO_{2e}, or a reduction of GHG emissions by approximately 15.4 percent.

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan. The 2017 Update builds upon the framework established by the 2008 Climate Change Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrain and reduce emissions at covered sources. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the Scoping Plan, the State's long-term goals, and state-of-the-science.

Senate Bill 375—Sustainable Communities Strategy

SB 375 was adopted with the goal of reducing GHG emissions from cars and light trucks. Under SB 375, the reduction target must be incorporated within that region's RTP, which is used for long-term transportation planning, in a SCS. Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS.

California Buildings Standard Code – Title 24 Standards

The California Energy Commission first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. The standards

are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods. The standards require that enforcement agencies determine compliance with the CCR, Title 24, Part 6 before issuing building permits for any construction.

Green Building Standards Code

Part 11 of CCR Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CalGreen) Code. The purpose of the CalGreen Code is to improve public health by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The CalGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CalGreen Code establishes mandatory measures for new residential and non-residential buildings, including energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

3.9.1.3 Regional

SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, SCAG adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), or Connect SoCal, as an update to the previous 2016–2040 RTP/SCS. Connect SoCal incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and reducing GHG emissions, and encouraging growth in walkable, mixed-use communities with convenient access to transit infrastructure and employment. SCAG, in conjunction with CARB, determined that implementation of Connect SoCal would achieve regional GHG reductions relative to 2005 SCAG areawide levels of approximately 8 percent in 2020 and approximately 19 percent by 2045. The regional GHG emissions reductions achieved through the Connect SoCal Growth Vision are consistent with the regional targets set forth by CARB through SB 375.

SCAQMD Policies

In 2008, the SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds. The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MTCO_{2e} per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO_{2e} per year would be assumed to have a less than significant impact on climate change.

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO_{2e} per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the

SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects); therefore, the commercial/residential thresholds were not formally adopted. The aforementioned Working Group has been inactive since 2011, however, and SCAQMD has not formally adopted any GHG significance threshold for land use development projects.

3.9.1.4 Local

GreenLA Action Plan

On May 15, 2007, Mayor Antonio Villaraigosa released the GreenLA Plan Climate Action Plan (GreenLA) that established an overall goal of reducing the City of Los Angeles' GHG emissions by 35 percent below 1990 levels by 2030. This goal exceeds the targets set by both California and the Kyoto Protocol and is the greatest reduction target of any large United States city. The cornerstone of the GreenLA Plan is increasing the City's use of renewable energy to 35 percent by 2020.

Sustainability pLAn/LA's Green New Deal

On April 8, 2015, Mayor Eric Garcetti released the Sustainability pLAn, a roadmap to achieve back-to-basics short-term results while setting the path to strengthen and transform the City. The pLAn is made up of short-term (by 2017) and longer-term (by 2025 and 2035) targets in 14 categories to advance the City's environment, economy, and equity. In 2019, Mayor Eric Garcetti released an update to the pLAn (L.A.'s Green New Deal), which accelerates previous sustainability targets and looks even further out to 2050. One provision of L.A.'s Green New Deal is the achievement of an entirely zero-emission bus fleet by the year 2030, which was adopted by the Los Angeles City Council in November 2017 (Council File 17-0739).

Los Angeles City Green Building Code

The City adopted the Green Building Code to reduce the City's carbon footprint. The Green Building Code applies to new buildings and alterations with building valuations over \$200,000 (residential and non-residential). The Green Building Code is based on the 2019 CALGreen Code within Title 24, Part 11, commonly known as CalGreen, that was developed and mandated by the State to attain consistency among the various jurisdictions within the State; reduce the building's energy and water use; and reduce waste.

3.9.2 Existing Environment

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and severe weather events. Global warming, a related concept, is the observed increase in the average temperature of the Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere.

GHGs are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature. GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and other gases that are not pertinent to the project.

Table 3.9-1 displays the statewide GHG emissions from 2010 to 2019 by economic sectors categorized in the 2008 Scoping Plan. Generally, California's GHG emissions have followed a declining trend over the past decade. In 2019, emissions from routine GHG emitting activities statewide were approximately 29.7 million metric tons of CO₂e (MMTCO₂e) (6.6 percent) lower than 2010 levels, and approximately 13 MMTCO₂e below the 1990 level (431 MMTCO₂e), which is the State's 2020 GHG target.

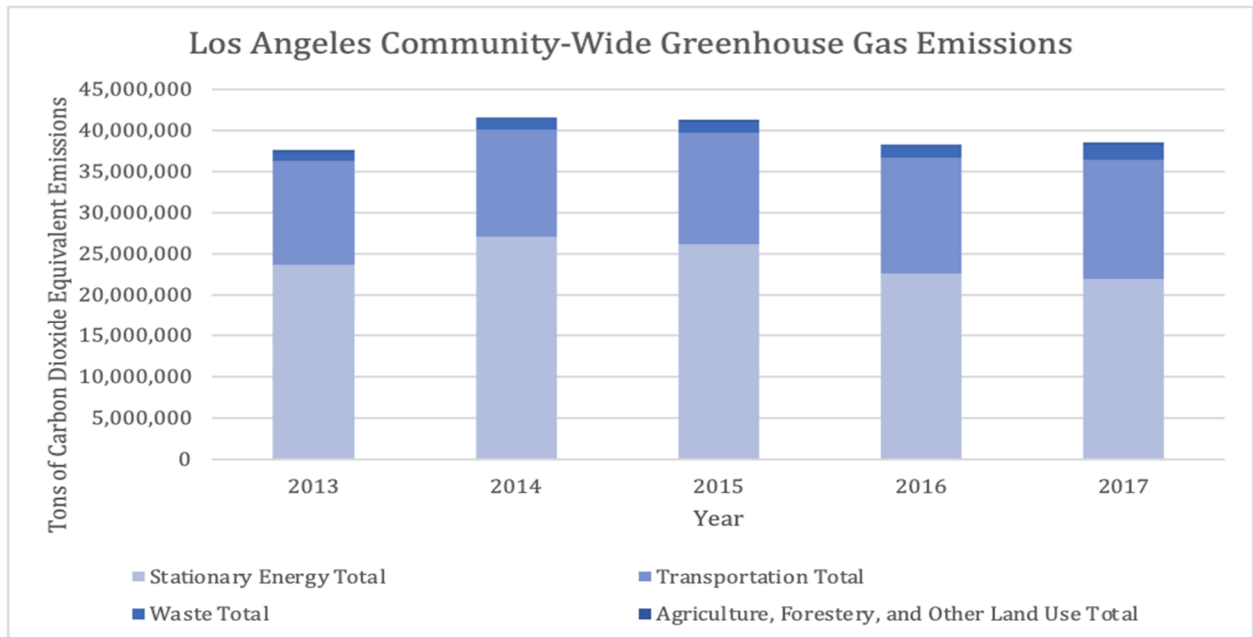
Table 3.9-1: California GHG Emissions Inventory Trend

Sector	CO ₂ e Emissions (Million Metric Tons)									
	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Transportation	165.1	161.8	161.4	161.3	162.6	166.2	169.8	171.2	169.6	166.1
Industrial	91.1	89.4	88.9	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Electric Power	90.3	89.2	98.2	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Commercial/ Residential	45.9	46.0	43.5	44.2	38.2	38.8	40.6	41.3	41.4	43.8
Agriculture	33.7	34.4	35.5	33.8	34.7	33.5	33.3	32.5	32.7	31.8
High GWP	13.5	14.5	15.5	16.8	17.7	18.6	19.2	20.0	20.4	20.6
Recycling and Waste	8.3	8.4	8.3	8.4	8.4	8.5	8.6	8.7	8.7	8.9
Emissions Total	447.9	443.7	451.3	447.6	443.0	440.7	429.1	424.6	425.1	418.2
Source: CARB, California Greenhouse Gas Emission Inventory – 2021 Edition, available at https://ww2.arb.ca.gov/ghg-inventory-data .										

Figure 3.9-1 displays the total annual emissions for the City between 2013–2017 and the contributions by sector.¹

¹ City of Los Angeles, *Los Angeles Open Data Portal – Community-Wide Greenhouse Gas Emissions*, 2020.

Figure 3.9-1: Los Angeles Community-Wide Greenhouse Gas Emissions



Within the City, the combination of stationary (i.e., building operations energy) and transportation sources comprise approximately 95 percent of total GHG emissions. The City is also currently striving to improve from being 50 percent energy-reliant on coal power to coal-free by 2025 and to expand its existing power mix of 30 percent renewable energy to 100 percent by 2045.

The project site is currently developed with two industrial buildings that have been left vacant for a period of time but are currently used as a logistics warehouse for solar panels temporarily while in escrow with the City. GHG emissions are currently generated by on-site industrial activities.

3.9.3 Impact Analysis

3.9.3.1 Methodology

CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess GHG emissions quantitatively or qualitatively. GHG emissions that would be generated by the project were estimated using the California Emissions Estimator Model (CalEEMod, Version 2020.4.0), which is the preferred regulatory tool recommended by SCAQMD for estimating GHG emissions from proposed CEQA projects. CalEEMod relies on an emissions factors database compiled from the CARB EMFAC on-road mobile source emissions inventory model and the CARB OFFROAD off-road equipment model, as well as regional survey data for energy resource consumption, water use, and solid waste generation, to produce estimates of GHG emissions.

The GHG emissions analysis quantified total GHG emissions that would be generated by off-road equipment and on-road vehicle sources during each phase of the proposed project construction. GHG emissions that would be generated by the construction of the project were estimated and amortized over a 30-year operational lifetime. The GHG emissions analysis for proposed project operations involved two elements: estimating direct and indirect GHG emissions generated by EBMF routine operations in CalEEMod and estimating indirect GHG emissions associated with the BEB fleet charging.

The detailed calculation assumptions, model input, and output can be found in the GHG Impact Assessment Technical Memorandum (TAHA, 2021).

3.9.3.2 Responses to CEQA Checklist

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Reference: CalEEMod; Senate Bill 100; GHG Emissions Impact Assessment (TAHA, 2022).

Comment: A significant impact may occur if the proposed project would generate GHG emissions that would have a significant impact on the environment. Direct sources of GHG emissions involved in the proposed project include equipment operations, commuting vehicle trips, energy (natural gas combustion), and area (landscaping) sources. Indirect GHG emissions would be associated with solid waste disposal, water and wastewater distribution, and electricity generation.

Less than significant impact. Direct sources of GHG emissions involved in proposed project construction and operations include construction equipment and vehicles, as well as operational mobile (commuting vehicle trips), energy (natural gas combustion), and area (landscaping) sources. Indirect GHG emissions would be associated with solid waste disposal, water and wastewater distribution, and electricity generation.

Construction

Construction of the proposed project is anticipated to begin in mid-2024 and last for approximately two years. CalEEMod was used to quantify the total amount of GHG emissions that would be generated by construction activities, and the construction emissions were amortized over a 30-year operational lifetime in accordance with SCAQMD methodologies. Construction of the proposed project would generate a short-term total of 688.4 MTCO_{2e}, which converts to approximately 22.9 MTCO_{2e} when amortized over 30 years.

Operations

CalEEMod was used to estimate annual GHG emissions associated with the standard building operations of the proposed project, including emissions associated with

employee commuting, energy use, property landscaping and maintenance, water and wastewater, and solid waste disposal. In addition to typical building operations, BEB charging would result in indirect emissions associated with the generation of electricity for BEB propulsion. Electricity at the project site for BEB charging would be provided by the LADWP, which reported an existing carbon intensity of its delivered power mix of 579 pounds of CO₂e per megawatt-hour (lbs.CO₂e/MWh) in 2020. Estimates of annual GHG emissions by the project are provided in Table 3.9-2.

Table 3.9-2: Estimated Annual GHG Emissions

Emissions Source	Source Type	Annual Emissions (MTCO₂e)
Amortized Construction	Direct	22.9
Area (i.e., Landscaping)	Direct	<0.1
Building Energy	Direct/Indirect	394.6
Net Mobile Vehicle Trips	Direct	87.9
Waste Disposal	Indirect	89.6
Water Distribution	Indirect	53.9
BEB Charging	Indirect	1,821.3
Total Annual Emissions		2,470.3
SCAQMD Annual Threshold (Industrial Uses)		10,000
On-Site Renewable Energy Analysis		
Fraction of Power Provided	Electricity Emission Reduction (MTCO₂e)	Net Annual Emissions (MTCO₂e)
5%	108.3	2,339.1
10%	216.6	2,230.8
15%	324.9	2,122.5
20%	433.2	2,014.2
25%	541.5	1,905.9
Source: TAHA, 2021.		

When combined with operational emissions, the total annual proposed project GHG emissions would be approximately 2,470.3 MTCO₂e per year. This value represents a conservative estimate based on the assumption that bus charging would require approximately 19 MWh daily to charge 76 BEBs for 2.5 hours at 100 kW, and also does not factor into account the amount of electricity that would be supplied by the 2,000-kW PV system. The demolition of the existing buildings and their discontinued use as a warehouse for solar panels would result in an additional reduction in GHG emissions that would be generated at the site. Furthermore, the project would be constructed in accordance with the City's Green Building Code, which would reduce the building's energy and water use and waste disposal needs, and associated GHG emissions.

Table 3.9-2 also provides a demonstrative analysis of the GHG emission reductions that would occur annually with the implementation of the proposed project, assuming a range of proportions of electrical power provided by the on-site renewable PV installation. As shown above, for every 5 percent of the total required electricity produced for proposed project operations, the on-site PV installation would provide an emissions benefit of approximately 108.3 MTCO_{2e} annually.

Additionally, the carbon intensity of the LADWP power mix would be reduced in future years to comply with SB100, which requires all electricity service providers within the State to obtain 44 percent of supplied power from renewable resources by the end of 2024 and 52 percent of supplied renewable power by the end of 2027, with the ultimate goal of reaching 60 percent renewable by the end of 2030. Annual indirect GHG emissions associated with the provision of LADWP electricity would gradually decline in future years as the power mix expands its renewable portfolio. Regardless of expected GHG emissions reductions associated with on-site renewable energy and the expansion of LADWP's renewable power mix, implementation of the proposed project would generate no more than 2,470 MTCO_{2e} annually, which would be substantially below the SCAQMD's annual mass threshold for industrial uses.

The GHG emissions estimates do not account for existing Compton Facility operations, where 95 LADOT buses are currently stored and maintained. Once the proposed project is fully implemented, LADOT operations at the Compton Facility would eventually cease as they are replaced by the EBMF. The net increase in GHG emissions would be lower than shown in Table 3.9-2, above, after accounting for the cessation of energy, utility, and area source GHG emissions attributed to the existing facility. Thus, the implementation of the proposed project would result in a less than significant impact related to the magnitude of direct and indirect GHG emissions that it would produce. No mitigation is required.

b) Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Reference: SCAG RTP/SCS; Climate Change Scoping Plan; L.A.'s Green New Deal; GHG Emissions Impact Assessment (TAHA, 2022).

Comment: A significant impact may occur if the implementation of the proposed project would impede the achievement of goals, targets, or objectives officially adopted by plans and regulations for the purpose of reducing GHG emissions. Applicable regulatory actions promulgated to reduce GHG emissions include Executive Order S-3-05, the AB 32 Climate Change Scoping Plan, EO B-30-15, SB 32, and the SCAG 2020–2045 RTP/SCS.

Less than significant impact. Electrification of transit services is a core component of GHG emission reduction planning initiatives at the state, regional, and local levels. The following analysis describes the extent to which the project complies with or does not conflict with adopted plans and policies to reduce GHG emissions. As the effects of GHG emissions on the environment are fundamentally cumulative, the assessment of potential impacts evaluated the combined emissions from short-term construction

activities and long-term EBMF operations in the context of applicable plans and policies.

At the State level, EO S-3-05 and B-30-15 are orders from the State's Executive Branch designed to reduce GHG emissions. The goal of EO S-3-05 to reduce GHG emissions to 1990 levels by 2020 was adopted by the Legislature as the 2006 Global Warming Solutions Act (AB 32) and codified into law in HSC division 25.5. The goal of EO B-30-15 to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030 was adopted by the Legislature in SB 32 and also codified into law in Health and Safety Code (HSC) Division 25.5. In support of HSC Division 25.5, the State has promulgated a robust framework of laws and strategies to reduce GHG emissions in the *Climate Change Scoping Plan*.

The *Climate Change Scoping Plan* and subsequent updates in 2014 and 2017 contain a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The GHG Emissions Impact Assessment (Appendix F) provides an evaluation of project consistency with relevant measures in the 2008 and 2017 Climate Change Scoping Plans and RTP/SCS. No conflict with these plans would occur with the project.

Although L.A.'s *Green New Deal* does not represent an approved Climate Action Plan under CEQA, it includes the proposed project as necessary to achieve its goals. Implementation of the project is essential to achieving City initiatives to adapt to the effects of climate change. The 2020 LADOT Transit Rollout Plan recognized that the EBMF is needed to meet the City's goal of 100 percent BEBs by 2030, as adopted through City Council Motion 17-0739 that was incorporated into L.A.'s *Green New Deal*. Thus, the proposed project would provide direct benefits towards meeting the objectives of L.A.'s *Green New Deal*. Therefore, the implementation of the project would be consistent with all applicable GHG reduction plans and policies, and its impact would be less than significant. No mitigation is required.

3.10 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A Hazardous Materials Technical Memorandum (Parsons, 2022) was prepared for the project and is provided in Appendix G. The findings of the study are summarized below.

3.10.1 Regulatory Setting

This section describes existing laws and regulations related to hazards and hazardous materials that apply to the project.

3.10.1.1 Federal

Toxic Substances Control Act/ Resource Conservation and Recovery Act/ Hazardous and Solid Waste Act

The Toxic Substances Control Act (TSCA) of 1976 and the Resources Conservation and Recovery Act (RCRA) of 1976 established the U.S. Environmental Protection Agency (U.S. EPA)-administered program to regulate the generation, transportation, treatment, storage, and disposal of hazardous waste. TSCA authorized the U.S. EPA to secure information on new and existing chemical substances, and to control the substances that were determined to cause unreasonable risk to public health or the environment. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the “cradle to grave” systems of regulating hazardous wastes.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 provides a Federal “Superfund” to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the U.S. EPA is given the power to seek out those parties responsible for any release and assure their cooperation in the cleanup. The U.S. EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, U.S. EPA obtains private party cleanup through orders, consent decrees, and other small party settlements. U.S. EPA also recovers costs from financially viable individuals and companies once a response action has been completed.

Superfund Amendments and Reauthorization Act

The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA on October 17, 1986. SARA reflected the U.S. EPA's experience in administering the complex Superfund program during its first six years and made several important changes and additions to the program. SARA stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites; required Superfund actions to consider the standards and requirements found in other State and Federal environmental laws and regulations; provided new enforcement authorities and settlement tools; increased State involvement in every phase of the Superfund program; increased the focus on human health problems posed by hazardous waste sites; encouraged greater citizen participation in making decisions on how sites should be cleaned up; and increased the size of the trust fund to \$8.5 billion.

SARA also required U.S. EPA to revise the Hazard Ranking System to ensure that it accurately assessed the relative degree of risk to human health and the environment posed by uncontrolled hazardous waste sites that may be placed on the National Priorities List (NPL).

Clean Water Act

The Clean Water Act (CWA) of 1977 (33 U.S.C. 1251 et seq.), which amended the Federal Water Pollution Control Act of 1972, established the basic structure for regulating discharges of pollutants into the waters of the United States (not including groundwater) and was designed to restore and maintain the chemical, physical and biological integrity of the waters of the United States. The CWA delegates authority to the U.S. Environmental Protection Agency (U.S. EPA) to implement pollution control programs. Under the CWA, it is unlawful for any person to discharge any pollutant from a point source into navigable waters.

Section 303(d) of the CWA requires each state to identify and list impaired surface waters that do not meet, or that the state expects will not meet, state water quality standards. This is a subset of the 305(b) list, which contains information on all water bodies. It also requires each state to develop total maximum daily loads (TMDLs) from the pollution sources for such impaired water bodies. The water quality standards are promulgated under the National Toxics Rule (NTR) or the California Toxics Rule (CTR) after minimum technology-based effluent limitations have been implemented for point sources.

Section 401 of the CWA requires the protection of the physical, chemical, and biological integrity of waters. Section 401 requires that when applying for a federal permit for proposed activities that may discharge into waters of the United States, the applicant is required to obtain certification from the state that the discharge will comply with the provisions of the CWA. Applicants are required to meet the effluent limitations and monitoring requirements necessary to ensure compliance with the federal license or permit.

Section 402 of the CWA establishes the National Pollutant Discharge Elimination System (NPDES) permit program to regulate all point source discharges to waters of the United States, including stormwater associated with construction activities, industrial operations, and municipal drainage systems, to protect surface water quality. The NPDES permit program controls, minimizes, or reduces surface water impacts. Two types of the NPDES program stormwater permits would be relevant to the project, the Municipal General Permit and Construction General Permit.

Occupational Safety and Health Administration Standards

The Occupational Safety and Health Administration's (OSHA) mission is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs. OSHA standards are listed in 29 CFR 1910.

3.10.1.2 State

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) was created in 1991. It unified California's environmental authority in a single cabinet-level agency and brought the California Air Resources Board (CARB), State Water Resources Control Board (SWRCB), RWQCB, CalRecycle, Department of Toxic Substances Control, Office of Environmental Health Hazard Assessment, and Department of Pesticide Regulation under one agency. These agencies were placed under the CalEPA "umbrella" for the protection of human health and the environment to ensure the coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

California Department of Toxic Substances Control

The Department of Toxic Substances Control (DTSC) is the primary state agency with jurisdiction over hazardous chemical materials management. Through the enforcement of hazardous waste laws and regulations, DTSC is committed to protecting residents and their environment from exposure to hazardous waste (DTSC, 2020). The DTSC takes enforcement action against violators; oversees cleanup of hazardous wastes on contaminated properties; makes decisions on permit applications from companies that want to store, treat or dispose of hazardous waste; and protects consumers against toxic ingredients in everyday products. The DTSC is committed to engaging the public in a way that gives those most affected by its decisions opportunities to voice their concerns and ask questions.

Cortese List

Government Code 65962.5 requires CalEPA to develop a hazardous waste and substances site list (Cortese List), which includes: hazardous waste sites according to DTSC and the Health and Safety Code; contaminated public drinking water wells sites listed by the State Department of Health Services; Underground Storage Tank (UST) leaks, solid waste facilities, and hazardous waste sites listed by the SWRCB; and other sites as designated by various other state and local governments. Section 6592.5 requires that the Cortese list be at least annually updated. The Cortese List complies with the CEQA requirements in providing information about the location of hazardous materials release sites.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act restricts the disposal of wastes or any other activity that may degrade the waters of the state. The Porter-Cologne Water Quality Control Act requires cleanup of wastes that are below hazardous concentrations but could impact ground and surface water quality (Section 13002). The Porter-Cologne Water Quality Control Act established nine Region and State Water Boards, which are primarily responsible for protecting water quality in California. The Regional Water Boards regulate discharges by issuing permits through NPDES for waste discharge requirements for non-point source discharges. Anyone discharging materials or proposing to discharge materials that could affect water

quality must file a report of waste discharge unless the discharge would be into a community sewer system (SWRCB, 2019).

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (California Health and Safety Code, Chapter 6.11, Sections 25404–25404.9) provides authority to the Certified Unified Program Agency (CUPA). The CUPA for the City is the Los Angeles Fire Department (LAFD) Haz Mat Program.

The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of the following hazardous materials programs: Site Mitigation Unit (SMU), Hazardous Materials Business Plan (HMBP) Program, California Accidental Release Prevention (CalARP) Program, UST Program, Above ground Storage Tank (AST) Program, Hazardous Waste Generator Program, and Hazardous Waste Tiered-Permitting Program.

California Code of Regulations, Title 8—Industrial Relations

Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (Cal OSHA) and the federal OSHA are the agencies responsible for assuring worker safety in the workplace. Cal OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. These standards would apply to construction activities.

California Labor Code (Division 5, Parts 1, 6, 7, and 7.5)

The California Labor Code is a collection of regulations that include regulation of the workplace to ensure appropriate training on the use and handling of hazardous materials and operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who oversee handling hazardous materials are appropriately trained and informed with respect to the materials they handle. Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

3.10.1.3 Regional

South Coast Air Quality Management District Rules

The SCAQMD has also established various rules to manage and improve air quality in the South Coast Air Basin (SCAB). The proposed project shall comply with all applicable SCAQMD Rules and Regulations pertaining to construction activities, including, but not limited to:

- **Rule 402 (Nuisance)** states that a person should not emit air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the

comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- **Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil** was adopted by the SCAQMD on August 5, 1988, and subsequently amended in 1995 and 2001. The rule sets requirements to control the emission of Volatile Organic Compounds (VOC) during the excavating, grading, handling, and/or treating of VOC- contaminated soil. Before these activities, an approved mitigation plan must be obtained from SCAQMD.
- **Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities** specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM), such as underground utility pipes, which may be applicable in some instances on the project site. The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures, and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfiling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings. Applicability of this rule, in whole or in part, applies to owners and operators of any demolition or renovation activity, and the associated disturbance of asbestos.

3.10.1.4 Local

City of Los Angeles General Plan Safety Element

The City's General Plan Safety Element (Safety Element), which was adopted in 1996, addresses public safety risks due to natural disasters, including seismic events and geologic conditions; and sets forth guidance for emergency response during such disasters. The Hazard Mitigation section of the Safety Element includes a goal to minimize "...injury, loss of life, property damage and disruption of the social and economic life due to fire, water-related hazard, seismic event, geologic conditions or release of hazardous materials disasters...". It also includes a policy to "...protect the public and workers from the release of hazardous materials and protect City water supplies and resources from contamination resulting from accidental release or intrusion resulting from a disaster event, including protection of the environment and public from potential health and safety hazards associated with program implementation."

Los Angeles Fire Department (LAFD) Haz Mat Program

The LAFD provides emergency response and guidance to hazardous materials incidents within the City. The LAFD Haz Mat Program utilizes a unified approach with allied agencies (i.e. Los Angeles County Fire Department or LACFD) and many stakeholders to provide preparedness, prevention, response, mitigation, and resiliency to hazardous materials emergencies. The LAFD is an all-hazards response organization, and the Haz Mat Program is designed to address the natural,

technological, or purposeful response challenges, including chemical, biological, radiological, nuclear, and explosive (CBRNE) threats to our community and national security. As the Certified Unified Program Agency (CUPA), the LAFD implements the Haz Mat Program and uses the *Hazardous Materials Incident Contingency Plan* protocol by the California Office of Emergency Services for the notification process and handling of emergencies related to hazardous material incidents.

City of Los Angeles Emergency Operations Organization and Hazard Mitigation Plan

The Department of Emergency Operations Organization (EEO) within the City is responsible for the City's emergency preparations (planning, training, and mitigation), response and recovery operations. The EEO is comprised of all agencies of the City's government and centralizes command and information coordination to enable its unified chain-of-command to operate efficiently and effectively in managing the City's resources.

The 2018 Hazard Mitigation Plan (HMP) is prepared to lessen the vulnerability to disasters and to reduce risks from natural hazards. An HMP serves as a guide for decision makers as they commit City resources to minimize the effects of natural hazards. The HMP integrates with existing planning mechanisms such as building and zoning regulations, long-range planning mechanisms, and environmental planning. The planning process includes conducting a thorough hazard vulnerability analysis, creating community disaster mitigation priorities, and developing subsequent mitigation strategies and projects.

3.10.2 Existing Environment

Phase I ESA

The Phase I ESA for the project site states that the 740-780 East 111th Place property (APN 6071-022-009) is developed with an approximately 118,800-square-foot single-story warehouse building (circa 1956), which is partitioned into two storage areas separated by a solid wall and an office space in the northwestern corner. Two 350-gallon polyethylene totes with unknown contents were observed in the driveway. Small oil-like stains were observed in the southern warehouse. Most of the floor space in the active warehouse was obscured by merchandise stacked on pallets, making it impossible to identify staining in these areas. Two electrical transformers were located inside the existing structures; however, it is unknown if these units contain polychlorinated biphenyl (PCB). A sump that potentially captures surface water runoff was also identified on the northwest corner of the warehouse, near the loading dock. Numerous asphalt patches were observed in the exterior, some of which, appeared large enough to potentially indicate former soil excavations. The areas were large enough for an underground storage tank (UST) to have been previously present.

The 800 East 111th Place property (APN 6071-022-013) is developed with an approximately 32,250-square-foot single-story warehouse building (circa 1957), which is divided into three portions. An electrical transformer owned by LADWP was observed in the northeast corner of the driveway, however, it is unknown if it contains

PCBs. The granular sorbent was spread out over a large area in the driveway; however, it was unclear what had spilled. Most of the parking areas were being utilized for miscellaneous storage, however, the visible areas were generally oil-stained. The miscellaneous storage at this parcel included the following wastes:

- Roll-off bins containing soil and/or items to be segregated for recycling
- 55-gallon drums and 5-gallon buckets filled with used transmission fluid, used motor oil, other automotive lubricants, and used oil filters
- 350-gallon totes (some were empty) containing unknown liquid material
- Used metal fuel tanks
- Universal waste
- Obsolete set lighting (unknown if they contain PCBs)
- Inoperable vehicles and trailers at various states of decay

The Phase I ESA identified the following recognized environmental conditions (RECs) associated with the site:

- The historic presence of USTs used for fuels with a documented release, as well as the current use of the site for chemical storage with evidence of spills.
- Two environmental cases have previously been opened for 740-780 East 111th Place (Formerly Bell Industries Reliable Steel), both relating to unauthorized releases from on-site diesel USTs. The impacts to soil were identified during the removal of both USTs; first, the 7,000-gallon diesel UST tank in 1988, followed by the removal of the 10,000-gallon diesel UST in 1994. Remedial action (excavation) was completed for both cases. No record of a 'No Further Action' designation for the case related to the 7,000-gallon UST was found. However, the Phase I ESA concluded that this was related to incomplete records rather than a continued violation. The case related to the removal of the 10,000-gallon UST did receive a 'No Further Action' notice from the City of Los Angeles Fire Department following the completion of excavation activities in 1994. These two former cases were identified as RECs due to the potential for residual contamination to remain in the soil and the potential to have created a potential vapor intrusion issue.
- Records identified several fuel USTs as having been present at 800 East 111th Place (formerly Aircraft & Component Equipment Suppliers). Based on these records, the potential exists for at least two of the USTs to remain in place.
- Chemical and waste storage were identified at both properties during the site reconnaissance visit, including, but not limited to, totes with unidentified liquids, soil bins, vessels with petroleum hydrocarbons, and various solvents. Additionally, distressed asphalt, as well as evidence of surface releases (staining, sorbent materials, etc.) were observed throughout the exteriors of both properties. The presence of this combination of chemicals and the stained, distressed asphalt were identified as a REC. The distressed surfacing presents a potential pathway for those chemicals to migrate into the underlying soil.

Based on these RECs, the Phase I ESA recommended the completion of a Phase II ESA, including the collection of soil and sub-slab soil vapor samples for laboratory

analyses, to assess the presence of any subsurface impacts from potential chemicals of concern (PCOCs). Additionally, it recommended that a geophysical survey be completed to evaluate if any of the USTs remained at the two properties.

Also, based on the years of construction (1956-1957), both buildings on the two properties have a higher risk of containing asbestos-containing materials (ACMs), PCBs in caulk, transformers, and other old electrical equipment, and/or lead-based paint. In accordance with SCAQMD Rule 1403, a pre-demolition building survey for ACM is required before demolition. Therefore, a pre-demolition survey is recommended for ACMs, lead-based paint, PCBs, and other hazardous materials before any on-site demolition.

Phase II ESA and Additional Site Assessment

A Phase II ESA was completed for the 740-780 and 800 East 111th Place properties, including soil and sub-slab soil vapor sampling, to evaluate the potential for impacts to the subsurface from volatile organic compounds (VOCs), metals, and total petroleum hydrocarbons (TPH). As part of the Phase II ESA, 16 soil borings were drilled to a maximum terminal depth of 25 feet (ft.) bgs. A total of 49 soil samples were submitted for laboratory analysis for VOCs, TPH, and total metals. Additionally, 13 sub-slab soil vapor samples were collected from 12 Cox-Colvin Vapor Pins™ that were installed in the slabs of both the existing buildings. The 13 sub-slab soil vapor samples were analyzed for VOCs, fixed gases, and methane.

TPH in both the diesel (DRO) and waste oil (ORO) ranges, as well as four VOCs (acetone, benzene, toluene, and tetrachloroethene [PCE]), were detected in soil samples. However, all concentrations were below regulatory screening levels. Several metals were also detected in the soil samples that were analyzed. Arsenic was the only metal with concentrations that exceeded screening levels. All detected concentrations were below background levels (12 mg/kg) typical of southern California as accepted by the DTSC. All other metal detections were below their corresponding regulatory screening levels.

The soil vapor analytical results were compared to screening levels published by the DTSC HERO Note Number 3 – Modified Screening Levels for Ambient Air. The commercial use screening levels were calculated by applying the DTSC recommended attenuation factor of 0.03 for sub-slab soil gas and ‘near-source’ exterior soil gas (DTSC 2019) to the ambient air screening level. Several VOCs were detected in the 13 sub-slab soil vapor samples. Apart from PCE, all were below their corresponding screening levels. PCE was detected in seven of the sub-slab soil vapor samples submitted for laboratory analysis at concentrations ranging from 91 to 1,200 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). All seven of these detected concentrations of PCE exceeded the calculated (commercial) soil vapor screening level of $66.7 \mu\text{g}/\text{m}^3$. The highest concentrations of PCE were observed beneath the 800 East 111th Place building.

Based on the concentrations of PCE in sub-slab soil vapor along with the age and condition of the buildings, the Phase II ESA concluded that the potential exists for

impacted soil vapor to be intruding into the buildings. As such, an additional site assessment at the 800 East 111th Place property is recommended to further characterize the extent of PCE impacts to the project site.

The Additional Site Assessment included the drilling of 10 soil borings on the 800 East 111th Place property for the collection of soil and soil vapor samples. A total of 59 soil samples were submitted for laboratory analysis of VOCs. Borings SV-1 through SV-7 were drilled to 15.5 ft. bgs and completed as dual-nested soil vapor probes. Borings SV-8 through SV-10 were drilled to 30.5 ft. bgs and completed as triple-nested soil vapor probes. A total of 17 soil vapor samples were collected from the newly installed vapor probes and analyzed for VOCs.

Four VOCs (acetone, benzene, toluene, and PCE) were detected in the soil samples analyzed as part of the Additional Site Assessment, however, all at concentrations below regulatory screening levels.

Several VOCs were detected in the 17 soil vapor samples, however, apart from PCE, all were below their corresponding screening levels. PCE was detected in all 17 of the soil vapor samples submitted for laboratory analysis at concentrations ranging from 11 to 2,100 $\mu\text{g}/\text{m}^3$. Fifteen of these detected concentrations of PCE exceeded the calculated soil vapor screening level of 66.7 $\mu\text{g}/\text{m}^3$. Elevated PCE concentrations were observed at all depth intervals that were sampled. The highest PCE concentrations were observed along the central southern boundary of 800 East 111th Place. The plume of impacted soil vapor appears to extend north beneath the on-site building, west beneath the 740-780 East 111th Place building, and east beneath the Animo James B. Taylor Charter Middle School.

Based on the combined investigations, the Phase II ESA made the following conclusions:

- While VOCs, TPH, and metals were identified in soil, all concentrations were below regulatory screening and/or established background levels. As such, the soil does not appear to pose a risk to human health at the project site.
- Soil vapor beneath the site is impacted with PCE at concentrations above the screening level of 66.7 $\mu\text{g}/\text{m}^3$, which poses a potential risk to human health. Impacts extend vertically to at least 30 ft. bgs and laterally beneath the building located on 740-780 East 111th Place and potentially beneath the eastern-adjacent building of the Animo James B. Taylor Charter Middle School.
- Neither the lateral nor the vertical extents of the PCE plume were identified during these two investigations.
- Based on the historic use of 800 East 111th Place as an aircraft component and equipment supplier, and the (then) current use as a waste storage facility, the PCE impacts are likely a result of undocumented release(s) of chemicals into the soil.
- The potential exists for the PCE impacts to have migrated vertically into groundwater. If this is the case, there is also the potential for the PCE impacts to have comeingled with a solvent-impacted groundwater plume that was

- generated at a site approximately 1,000 feet east of the property, known as the Lanzit Project.
- The solvent-impacted groundwater was likely the source of the PCE impacts in soil vapor.
 - Other impacts to soil may exist beneath the site, but the current storage of waste, equipment, and other debris prevented these areas from being tested.

3.10.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections F.1 and F.2); Phase I ESA, Phase II ESA and Additional Site Assessment; Hazardous Materials Analysis (Parsons, 2022).

Comment: A significant impact may occur if the project utilizes substantial amounts of hazardous materials as part of its routine operations and could potentially pose a hazard to the public under accidental or upset conditions.

Less than significant impact with mitigation incorporated. Project construction would include the demolition of the existing buildings on the site, followed by the construction of several buildings and structures, including a two-story operations building to provide dispatch and administrative functions, a maintenance building with 10 bus maintenance bays, a service building, a bus wash building, BEB parking/charging area, and a second-story parking deck for up to 360 employee/visitor vehicles, with the canopy above the parking deck topped with a 200-kilowatt photovoltaic system. The project would not introduce new land uses that would involve or require the routine transport, use, or disposal of large quantities of hazardous materials. Lithium iron phosphate batteries would be present on the electric buses, but additional batteries would not be stored on-site. Instead, they would be replaced, as needed, with new ones brought to the site and old ones hauled away (anticipated to be every 12 years). Solvents, oil, grease, and other cleaning products would also be needed for bus maintenance and repair activities but would be used, stored, and disposed of in accordance with current regulations.

The 800 East 111th Place property is listed as having up to two 7,500-gallon USTs and an unknown quantity of 2,000-gallon USTs containing regular unleaded fuel installed in 1975. The CA FID UST status is reported as “Active” and there is no indication that the USTs have been removed. Although there were no reported violations or releases, the storage, use, and disposal of petroleum hydrocarbons, as well as the potential presence of fuel USTs on-site was identified as a recognized environmental concern (REC) in the Phase I ESA. As presented in the Phase I ESA,

several other containers containing potentially hazardous material and/or wastes are currently located on the property.

The 740-780 East 111th Place property is listed as generating and recycling approximately 12.51 tons of waste oil and mixed oil in 1994. This facility is also listed as having had two 9,940-gallon USTs containing regular unleaded fuel and an unknown quantity of 7,000-gallon USTs containing diesel fuel installed in 1956. The CA FID UST status is reported as 'Inactive'. A review of UST information collected from local UST databases (Los Angeles Fire Department) indicates multiple releases of diesel from the former on-site USTs. The documented unauthorized release of two former USTs with potential for residual impacts to remain was identified as a REC in the Phase I ESA.

Based on these RECs, two subsequent subsurface investigations were completed at the site. Samples of soil and soil vapor were collected and analyzed for potential chemicals of concern (PCOCs). VOCs and TPH were identified in the soil at a concentration below human health risk (HHR) screening levels. However, the extent of impacts to soil was not delineated due to access issues. PCE was identified in soil vapor at concentrations exceeding HHR screening levels. Concentrations of PCE in soil vapor beneath both properties are considered hazardous to human health. Therefore, while the properties are not currently listed as hazardous waste/material cleanup sites, they likely will be once this data is reported to a regulatory agency in accordance with the state and federal related to reporting unauthorized releases. Once reported, additional characterization and subsequent remedial and/or mitigation measures will fall under the oversight of state or local agencies, such as the RWQCB, DTSC, and LAFD. While the City was not responsible for any unauthorized releases on or near the site, the City would comply with any measures to be put in place by the designated oversight agency as part of the proposed project. It is anticipated that all hazardous wastes currently located on the project site would be removed before the construction of the proposed facility (MM-HAZ-1 through MM-HAZ-3). These measures would limit the exposure of the underlying contamination to the public, and therefore, reduce potential impacts to less than significant levels after mitigation.

During project construction and post-construction operation would involve the transportation, use, storage, and disposal of limited quantities of hazardous materials such as paints, solvents, adhesives, fuel, lubricants, grease, asphalt, and concrete materials. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the DTSC, the U.S. EPA, the OSHA, the LAFD, and the Los Angeles County Department of Public Health. Additionally, the project would comply with applicable federal, state, and local regulations related to hazardous materials (SC-HAZ-1 through SC-HAZ-5). The potential for the release of hazardous materials during project construction is considered low, and if a release was to occur, it would not result in a significant hazard to the public, surrounding land uses, or the environment due to the small quantities of materials being used at the site. Impacts would be less than significant during project operations.

Standard Conditions

The following Standard Conditions shall be implemented, as standard measures for compliance with existing regulations:

- SC-HAZ-1:** All hazardous materials and wastes shall be handled and disposed of in accordance with applicable regulations, including South Coast Air Quality Management District (SCAQMD) Regulations.
- SC-HAZ-2:** Workers exposed to or handling contaminated soils shall have sufficient health and safety training, consistent with Occupational Safety and Health Administration (OSHA) Hazardous Waste Operation Standards (29 CFR 1910.120), and Cal-OSHA "Hazardous Waste Operations & Emergency Response" (HAZWOPER) (8 CCR 5192). The Contractor, qualified subcontractor, or an industrial hygienist shall prepare a site-specific health and safety plan. The plan shall appoint a site safety officer and establish responses to contaminants, including methane gas, known to exist in the area based on the site knowledge and the Phase II Environmental Site Assessment (ESA) and Additional Site Assessment Report.
- SC-HAZ-3:** Soils that have visible staining or an odor shall be tested in the field by the Contractor or qualified environmental subcontractor with an organic vapor analyzer (OVA) for volatile components, which require additional considerations in their handling and disposal. Soil with OVA readings exceeding 50 parts per million (ppm) volatile organic compounds (probe held 3 inches from the excavated soil face), or which is visibly stained or has a detectable petrochemical odor shall be stockpiled by the Contractor separately from non-contaminated soils. If volatile compounds are present at concentrations exceeding 50 ppm, the South Coast Air Quality Management District (SCAQMD) Rule 1166 permit will be required, which most likely will require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution.
- SC-HAZ-4:** Any contaminated material (i.e., soil, asphalt, concrete, railroad ballast, trash fill, or debris) that is to be hauled off the site is considered a "waste product" and must be classified as hazardous or non-hazardous waste under all criteria by both State and Federal Codes before disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest will be prepared by the Contractor or its qualified representative, and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels that can be returned to the excavation or is not needed on the site, a less costly nonhazardous transporter and soil recycling facility shall be

used if no hazardous constituents are present above their respective action levels.

SC-HAZ-5: In accordance with South Coast Air Quality Management District (SCAQMD) Rule 1403, a pre-demolition building survey for asbestos-containing materials (ACMs) is required before demolition. Therefore, a pre-demolition survey is recommended for ACMs, lead-based paint, polychlorinated biphenyl (PCB), and other hazardous materials before any on-site demolition.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Reference: L.A. CEQA Thresholds Guide (Sections F.1 and F.2); DTSC EnviroStor Data Management System; SWRCB Geotracker; Hazardous Materials Analysis (Parsons, 2022).

Comment: A significant impact may occur if the proposed project involved a risk of accidental explosion or used substantial amounts of hazardous materials as part of its routine operations that could pose a hazard to the public under accidental or upset conditions.

Less than significant impact. As discussed above, the construction and operation of the project would involve the transportation, use, and disposal of limited quantities of hazardous material such as paints, solvents, adhesives, fuels, lubricants, grease, and asphalt. Employees may be exposed to hazardous materials during construction. Exposure of construction/operational workers, the public, or the environment to contaminated materials can be minimized by implementing the measures required by federal, state, and local laws and regulations including, but not limited to the regulatory requirements listed in SC-HAZ-1 through SC-HAZ-5. The potential impacts to the public or environment would be less than significant. The potential for the release of hazardous materials during project construction is considered low, and if a release was to occur, it would not result in a significant hazard to the public, surrounding land uses, or the environment due to the small quantities of materials being used at the site. Therefore, the short-term construction impact would be less than significant.

According to DTSC's EnviroStor and SWRCB's GeoTracker, the project site is not a hazardous materials site. The project would not be located on a site included on any list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5. Additionally, it is anticipated that all potentially hazardous materials that are currently being stored at the properties will be removed before the construction of the EBMF (SC-HAZ-1). Therefore, the impacts related to the foreseeable or accidental release of hazardous materials would be less than significant. No mitigation would be required.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Reference: L.A. CEQA Thresholds Guide (Section F.2); NavigateLA; Hazardous Materials Analysis (Parsons, 2022).

Comment: A significant impact may occur if the proposed project were located within one-quarter mile of an existing or proposed school site and were projected to release toxic emissions which pose a hazard beyond regulatory thresholds.

Less than significant impact. There are existing schools within a one-quarter mile (0.25-mile) of the project site, including:

- Animo James B. Taylor Charter Middle School, located immediately east of the project site
- Kedren Health Community Center and Head Start Preschool, located immediately west of the project site
- 109th Street Elementary School (10915 McKinley Avenue), located 0.11-mile to the north
- Animo Locke College Preparatory Academy Blue and Dot Green Public Schools (both at 325 East 111th Street), located 0.25-mile to the west

As discussed above, both the construction and post-construction operations would involve the transportation, use, and disposal of limited quantities of hazardous material such as paints, solvents, adhesives, fuels, lubricants, grease, and asphalt. The project would not involve the transportation, emission, or handling of hazardous or acutely hazardous materials that could result in a danger to a nearby school because such activities would comply with applicable federal, state, and local regulations, including SC-HAZ-1 through SC-HAZ-5. The potential project impacts to nearby schools would be less than significant. Thus, no mitigation would be required.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Reference: L.A. CEQA Thresholds Guide (Section F.2); DTSC EnviroStor; SWRCB's GeoTracker; Hazardous Materials Analysis (Parsons, 2022).

Comment: A significant impact may occur if the proposed project were included on an agency list of un-remediated hazardous or contaminated sites.

Less than significant impact. The site is not listed on the Cortese List but there are nearby facilities that are on the Cortese List. Construction near a site on the Cortese List is not necessarily an impact that would create a significant hazard to the public or the environment. Due to the nature of the proposed construction, only soils adjacent to possibly contaminated soils would be disturbed although these soils are not necessarily contaminated because of their vicinity to a contaminated site. The

following sites are located close to the project site and are listed on the Cortese List according to CalEPA, the LA RWQCB, and the DTSC:

- **WR Admin & Truck Yard:** According to SWRCB's Geotracker, this site, located at 850 East 111th Place, approximately 647 feet east-northeast of the project site, has an active permit for a UST. The permitting agency is the LACFD (Permit #FA0038754). The facility is identified as a generator/hauler of solid waste and as an active industrial facility that treats and/or disposes of liquid or semisolid waste. The type of waste is not reported. Construction of the EBMF is not anticipated to affect this UST site, nor pose an environmental hazard related to hazardous materials used at this facility.
- **Lanzit Project:** According to SWRCB's Geotracker, Lanzit Project (former Caltrans Site) is listed as a WDR site (WDR100001910) located at 930 East 111th Place, approximately 787 feet east-northeast of the EBMF project site. The Lanzit Project site operated as a Caltrans facility between 1947 and 1991. Since 1991, several subsurface investigations and subsequent remedial actions have been completed. The site has been identified to have soil, groundwater, and soil vapor impacted with TPH and several VOCs, including trichloroethylene. Several sources were identified, including a 550-gallon UST. The facility remained listed as a Leaking UST (LUST) cleanup site with an 'Open-Case Begin Date' status as of September 1990 and an 'Open-Remediation' status as of August 2011. In October 2011, a general WDR permit was issued by the Executive Officer of this Regional Board (Order No. R4-2007-0019, CI No. 9760, Series No. 176) to inject 30 Microemulsion (3DMe) and a hydrogen release compound (HRC) primer solution to mitigate VOCs contamination in the groundwater. Between November 2011 and August 2012, two injection events were conducted at the site. The last injection was completed in August 2012. A total of 78,400 pounds of 3DMe solution and 10,135 pounds of HRC primer were injected into the subsurface. Groundwater near the Lanzit Project site is approximately 60 to 65 ft. bgs with a gradient of 0.001 feet per foot to the north-northwest, putting the EBMF project site cross gradient. Additionally, construction of the EBMF is not anticipated to involve soil excavation that will expose contaminated groundwater. Construction of the EBMF project is not anticipated to affect this WDR site, nor will the construction of the project pose an environmental hazard related to hazardous materials on the public or environment.

Exposure of construction and operational workers to contaminated materials can be minimized by implementing the measures required by federal, state, and local laws and regulations, including, but not limited to SC-HAZ-1 through SC-HAZ-5. As such, potential impacts associated with the excavation of contaminated materials would be less than significant. Therefore, the implementation of regulatory requirements and adherence to federal, state, and local laws regarding hazardous materials sites would ensure that the project's impact would be less than significant.

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?

Reference: L.A. CEQA Thresholds Guide (Sections F.1 and K.2); City of Los Angeles General Plan; Southeast Los Angeles Community Plan; Los Angeles County, Department of Regional Planning, Airport Land Use Commission (ALUC); Hazardous Materials Analysis (Parsons, 2022).

Comment: A significant impact may occur if the proposed project site were located within a public airport land use plan area, or within 2 miles of a public airport, and would create a safety hazard or excessive noise.

No impact. The nearest public airport is Hawthorne Municipal Airport (also known as Jack Northrop Field) located at 12101 South Crenshaw Boulevard in Hawthorne, California (approximately 3.9 miles to the west/southwest of the EBMF project site). Additionally, the Los Angeles International Airport (LAX), located at 1 World Way in Los Angeles, California is 8.4 miles west of the EBMF project site. The project site is not located within the Airport Planning Boundary or Influence Area for these airports (ALUC, 2003, 2015). The closest private airstrips are Compton/Woodley Airport in Los Angeles, approximately 3.3 miles south of the project site, and the Prairie Gate at the Hawthorne Airport in Hawthorne, approximately 3.9 miles east of the project site. The site is not located within the Airport Planning Boundary or Influence Area for these private airstrips. As such, no impact would occur, and no mitigation is required.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Reference: L.A. CEQA Thresholds Guide (Sections F.1 and K.2); City of Los Angeles General Plan; Southeast Los Angeles Community Plan; Hazardous Materials Analysis (Parsons, 2022).

Comment: A significant impact may occur if the proposed project were to substantially interfere with roadway operations used in conjunction with an emergency response plan or evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan.

Less than significant impact. The City's Safety Element has identified disaster routes used to bring in emergency personnel, equipment, and supplies to impacted areas. Disaster routes are used during times of crisis to save lives, protect property, and minimize the impact on the environment. The project site is not located on disaster routes, which include Avalon Boulevard, Imperial Highway, and Central Avenue, and do not include East 111th Place, East Lanzit Avenue, or McKinley Avenue.

The construction and operation of the project would not impact permanent access to emergency response or evacuation routes. The construction of the EBMF is not anticipated to take place on roadways mapped as disaster routes. Only temporary lane closures and traffic pattern modifications are anticipated on East 111th Place for lane restriping and sidewalk and driveway reconstruction but most of the construction

will occur along the project site boundaries on East 111th Place. Improvements on East 111th Place would be conducted in accordance with the Traffic Management Plan (TMP) that would maintain access to all properties and provide detours for lane closures (SC-CC-1 through SC-CC-3), as discussed in Section 3.11 and the Community Impact Assessment. Emergency access and evacuation routes would be maintained and provided during both construction and operations.

The LAFD and other City agencies are implementing emergency procedures outlined in the City's Hazard Mitigation Plan to reduce risks from disasters to people, property, the economy, and the environment within the City. As the project site is not located on a public right-of-way and limited improvements are proposed on the public right-of-way, the project will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, no impacts are anticipated and no mitigation is required.

g) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Reference: L.A. CEQA Thresholds Guide (Section K.2); General Plan Safety Element; CalFire Fire Hazard Severity Zones; Los Angeles Hazard Mitigation Plan; NavigateLA; ZIMAS; Hazardous Materials Analysis (Parsons, 2022).

Comment: A significant impact may occur if the proposed project were in a wildland area and poses a significant fire hazard, which could affect persons or structures in the area in the event of a fire.

No impact. The project site is located within a highly urbanized area of the City and does not include wildlands or high fire hazard terrain or vegetation. The site is not identified by the City as being located in an area susceptible to fire hazards and according to ZIMAS, the project site is not within Very High Fires Hazard Severity Zones (VHFHSZ). The project involves the demolition of the existing buildings, followed by the construction of several new buildings and structures, and does not propose any improvement that would exacerbate the risk of wildfire. Furthermore, the project does not involve the construction of structures in which people would reside or recreate. Therefore, the project would not subject people or structures to a significant risk of loss, injury, or death because of exposure to wildland fires. No impacts would occur, and no mitigation is required.

3.10.4 Mitigation Measures

Based on the Phase II ESA and Additional Site Assessment, the following mitigation measures shall be implemented to reduce the significant adverse impacts pertaining to past use of hazardous materials at the site:

MM-HAZ-1: Additional site characterization to identify the lateral and vertical extents of tetrachloroethene (PCE) impacted soil vapor and assess if groundwater beneath the site has been impacted shall be conducted.

Following completion of site characterization, the City of Los Angeles shall report the “unauthorized release” to the appropriate agency for regulatory oversight. Once a case is opened, the City of Los Angeles shall comply with any additional characterization activities and subsequent remedial actions to the satisfaction of the regulatory oversight agency to protect construction workers, facility workers, and neighboring residences from exposure to impacted media (i.e., soil, groundwater, and/or soil vapor).

MM-HAZ-2: Before construction, a Soil Management Plan (SMP) shall be developed to provide construction workers with guidelines from a health and safety perspective (e.g., use of personal protective equipment, action levels, etc.) on handling impacted media that is encountered during any subsurface disturbance activities. The SMP shall describe site- and project-specific protocol to be followed in the event of encountering chemically impacted soil. The SMP shall also facilitate excavation activities by having a structured plan in place for the handling, characterization, and disposal of impacted soil wastes.

MM-HAZ-3: Additional measures, as recommended in the Phase II Environmental Site Assessment (ESA) and/or the additional Site Characterization to be performed for the project site, shall be taken to protect the proposed facility's workers. These measures may include, but are not limited to:

- All stored chemicals, equipment, underground storage tanks (USTs), and waste/debris shall be removed from both properties before purchase. Once removed, a pre-acquisition inspection should be performed to confirm the removal of all hazardous materials and other solid and liquid wastes stored on the properties.
- Due to the contaminant plume potentially extending offsite, consultation with legal counsel is needed to determine if notification to the Los Angeles Regional Water Quality Control Board (LARWQCB) of the potential unauthorized release is warranted. Should a case be opened with the LARWQCB, additional action may likely be required, including detailed site characterization, active remediation, and the designation of a responsible party.
- Measures (i.e., engineering controls such as vapor barriers) shall be installed within new construction, to address residual impacts of tetrachloroethene (PCE) in soil vapor in the event remediation is not pursued or completed. These measures typically consist of the installation of either an active or passive venting system and/or the application of a vapor barrier that is chemically resistant to chlorinated solvents.

Impacts would be less than significant after mitigation.

3.11 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.11.1 Regulatory Setting

This section describes existing laws and regulations related to hydrology and water quality that apply to the project.

3.11.1.1 Federal

Clean Water Act

The Clean Water Act (CWA) is the primary federal law protecting the nation's surface waters, including lakes, rivers, and coastal wetlands. A brief description of the CWA is provided under Section 3.9, Hazards and Hazardous Materials (Section 3.9.1 – Regulatory Setting).

National Pollutant Discharge Elimination System (NPDES) Permits

Stormwater discharges from construction sites are permitted under NPDES No. CAS000002, NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ), adopted on September 2, 2009, and amended by Order 2010-0014-DWQ and Order 2012-0006-DWQ (Construction General Permit) (CGP). Facilities discharging stormwater from construction projects with a disturbed soil area (DSA) of 1 acre or more are required to be covered by the CGP by completing and filing a Notice of Intent (NOI) with the SWRCB and requires implementation of a Stormwater Pollution Prevention Plan (SWPPP).

NPDES No. CAS000001, General Industrial Activity Storm Water Permit [IGP]), Order No. 2014-0057-DWQ, was adopted on April 1, 2014, and amended in 2015 and 2018. Facilities discharging stormwater associated with industrial activities are required to obtain individual NPDES permits for stormwater discharges or to be covered by a statewide general permit by completing and filing an NOI with SWRCB. Facilities requiring an IGP include transportation facilities, such as vehicle maintenance shops, equipment cleaning operations, or airport deicing operations. Only those portions of the facility involved in vehicle maintenance, including vehicle rehabilitation, mechanical repairs, painting, fueling, lubrication, or other operations identified in the IGP that are associated with industrial activity, would require coverage.

National Flood Insurance Act and Flood Disaster Protection Act

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 were enacted to reduce the need for flood protection structures and limit disaster relief costs by restricting development in floodplains. The Federal Emergency Management Agency (FEMA) administers programs associated with these acts. One of FEMA's duties is to administer the National Floodplain Insurance Program (NFIP) and develop standards for fluvial and coastal floodplain delineation. The NFIP is a federal program that enables property owners in participating communities to purchase insurance to protect against flood losses in exchange for state and community floodplain management regulations that reduce future flood damages.

3.11.1.2 State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Act grants ultimate authority to the SWRCB over state water rights and water quality policy and authorizes the nine RWQCBs to oversee water quality on a day-to-day basis at the regional and local levels. The Porter-Cologne Act is the basic water quality control law for California and works in coordination with the

CWA. The Porter-Cologne Act states that a RWQCB may include water discharge prohibitions applicable to conditions, areas, or types of waste within its regional plan. Section 13170 of the California Water Code also authorizes the SWRCB to adopt water quality control plans on its own initiative.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) was enacted in 2014 to require local agencies to adopt sustainability plans for groundwater basins identified by the California Department of Water Resources as high- and medium-priority. The SGMA intends to require sustainable groundwater management practices statewide and ensure reliable water supplies through drought and climate change.

3.11.1.3 Regional

Water Quality Control Plan (Basin Plan)

The Los Angeles RWQCB's Basin Plan identifies 24 beneficial uses for surface and groundwater in the Los Angeles region and the water quality objectives that must be attained or maintained to protect those designated beneficial uses. The Basin Plan contains the water quality regulations set by the Los Angeles RWQCB and describes the implementation programs and other actions necessary to achieve the water quality objectives. In cases where the Basin Plan does not contain a water quality objective for a pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents or water quality criteria developed under the CWA Section 304(a). Permits are issued to control pollution (i.e., water quality standards) while taking into consideration beneficial uses to be protected.

Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality

Discharges of treated or untreated groundwater generated by wells or borings, water system testing or flushing, commercial and public swimming pools, dewatering during excavations for construction, inert solid waste disposal, and cooling discharge operations are currently regulated under the General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality (Order No. 2003-003-DWQ). Dischargers are required to apply for coverage by filing an NOI and complying with the terms and conditions of the General Waste Discharge Requirements.

Los Angeles County Municipal Stormwater NPDES Permit (MS4 Permit)

The Los Angeles RWQCB has issued a Municipal Separate Storm Sewer (MS4) NPDES permit (Order No. R4-2012-0175, NPDES No. CAS004001) to regulate discharges of stormwater and non-stormwater from the Municipal Separate Storm Sewer Systems (MS4s) within the Coastal Watersheds of Los Angeles County which convey pollutants to surface waters throughout the Los Angeles Region. The Los Angeles County MS4 NPDES Permit covers 86 permittees, which include the City.

The purpose of this NPDES permit is to prohibit non-stormwater discharges and to reduce pollutants the discharge of pollutants in stormwater to the MS4 to the "maximum extent practicable" to maintain or attain water quality objectives (WQOs) that are protective of beneficial uses or receiving waters. The MS4 Permit contains

effluent limitations, receiving water limitations (RWLs), minimum control measures (MCMs), and TMDL provisions, and outlines the process for developing watershed management programs.

Per the NPDES permit, the City of Los Angeles would work cooperatively with the permittees to manage urban runoff. Provisions of the permit require the implementation of management practices to address stormwater runoff quality. The management practices represent the best practicable treatment and control of urban runoff discharges. The NPDES permits promote the implementation of low impact development (LID) BMPs, where feasible. LID BMPs reduce stormwater pollutant discharges by intercepting rainfall on vegetative canopies. LID BMPs can also reduce stormwater runoff by capturing and infiltrating runoff into existing or amended soils.

3.11.1.4 Local

City of Los Angeles Low-Impact Development Ordinance and Manual

The City's Stormwater LID Ordinance (Ordinance No. 181899, LAMC Section 64.70) requires the use of LID standards and practices in future developments and redevelopments to encourage the beneficial use of rainwater and urban runoff; reduce stormwater/urban runoff while improving water quality; promote rainwater harvesting; reduce off-site runoff and provide increased groundwater recharge; and reduce erosion and hydrologic impacts downstream.

City of Los Angeles Reference Guide for Stormwater Best Management Practices

The City's Reference Guide for Stormwater BMPs assists city engineers and managers in identifying, assessing, planning, developing, and selecting the appropriate BMPs. BMPs for construction, source control, and treatment control, including erosion and sedimentation control measures, site management practices, materials and waste management, and general preventive maintenance and inspection, are listed with targeted pollutants, project applications, implementation requirements, and costs to facilitate BMP selection.

City of Los Angeles Floodplain Management Plan

The City's Floodplain Management Plan (FMP) was originally established by Ordinance No. 154,405 and amended in 2012 and updated in 2020. It serves as the City's overall strategy for the protection of human life and property and minimizing flood hazards to businesses and infrastructure. The FMP identifies flood-related hazards in the City and sets goals for reducing flood hazards. It identifies the City's codes, standards, and ordinances that regulate the development of structures within the 100-year floodplain; seeks to retrofit, purchase or relocate structures in flood hazard areas; and establishes City programs for emergency response and evacuation.

City of Los Angeles Municipal Code

The City of Los Angeles Municipal Code (LAMC), Chapter VI, Article 4 outlines the requirements for public works and property as it relates to sewers, watercourses, and drains. Section 64.30 prescribes the requirements for the disposal of industrial

wastewater. The intent is to regulate industrial dischargers to protect the Publicly Owned Treatment Works (POTW). Specific discharge requirements for industrial facilities are defined in the issuance of Industrial Wastewater Permits. Additional prohibitions related to controlling the discharge of stormwater pollutants and urban runoff are found in Section 64.70.02 (Stormwater and Urban Runoff Pollution Control Ordinance).

3.11.2 Existing Environment

The project site is located within the Los Angeles Region of the RWQCB (Region 4), which encompasses the watersheds and drainages flowing to the Pacific Ocean between Rincon Point (on the coast of western Ventura County) and the eastern Los Angeles County. There are numerous watersheds within the region, with four primary watersheds encompassing the city of Los Angeles: Los Angeles River (Hydrologic Unit Code [HUC] 18070105); Santa Monica Bay/Ballona Creek (HUC 18070104), Dominguez Channel LA/Long Beach Harbors (HUC 18070104); and San Gabriel River (HUC 18070106).

The site lies with the Los Angeles River watershed, which covers approximately 824 square miles. Approximately 324 square miles of this watershed is open space or forested and the remainder is highly developed and urban. The Los Angeles River is 51 miles long, originating in the San Fernando Valley and flowing the central portion of the city to its terminus with the Pacific Ocean in Long Beach. The Los Angeles River is almost 5 miles east of the project site. Compton Creek, which is a tributary to the Los Angeles River, flows within a concrete-lined channel running approximately 8.5 miles from Main Street between 107th and 108th Streets to the confluence with the Los Angeles River in Rancho Dominguez. Compton Creek is located approximately 1,000 feet (0.2-mile) north and 1,500 feet (0.3-mile) east of the project site.

Both the Los Angeles River and Compton Creek are listed as impaired water bodies on the CWA Section 303(d) List, as a Category 5 waterbody. The criteria for a Category 5 waterbody include: 1) a water segment where standards are not met and a TMDL is required, but not yet completed, for at least one of the pollutants being listed for this segment.

Floodplain

The project site is located over 9 miles inland from the Pacific Ocean and based on FEMA's Flood Insurance Rate Maps and the City of Los Angeles General Plan Safety Element, the site is not located within the 100- or 500-year floodplains. There are no open or enclosed water bodies located near the project site.

Groundwater

The coastal plain of Los Angeles County is underlain by two major basins, the Central Basin and West Coast Basin. The project site is located on the western edge of the Central Basin. The shallowest main aquifer in this area is the Gardena Aquifer, found at depths of approximately 80 to 125 ft. bgs. The deeper Lynwood, Silverado, and Sunnyside Aquifers occur at depths of 175, 225, and 350 ft. bgs, respectively.

No site-specific assessment of groundwater depth or gradient direction was obtained during the Phase I ESA or the combined Phase II ESA and Additional Site Assessment for the site. Based on groundwater data obtained on December 10, 2018, from a site located approximately 1,300 ft. east-northeast of the project site, the depth to groundwater was approximately 60-65 ft. bgs, with a groundwater gradient of approximately 0.001 foot deep per foot of ground surface to the north-northwest. Based on the topography and existing surface conditions, general surface water flow near the project site is generally toward the northeast.

3.11.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Reference: L.A. CEQA Thresholds Guide (2006) (Section G.2); City of Los Angeles General Plan; City Stormwater Drainage Map Images; LADWP UWMP; NPDES Construction General Permit and Industrial General Permit.

Comment: A significant impact would occur if the project discharges water that does not meet the quality standards of the RWQCB, which regulates surface water quality and water discharge into stormwater drainage systems. A significant impact also may occur if a project includes potential sources of water pollutants and has the potential to substantially degrade water quality.

Less than significant impact. The proposed project would generate pollutants that may enter the stormwater.

Construction

Potential sources of stormwater quality degradation during construction of the proposed facility include loose soils during excavation and ground disturbance, demolition debris, construction equipment, and vehicles, building materials used for construction, and other on-site activities. During construction, all applicable stormwater management requirements for pollution prevention would be adhered to including the Stormwater and Urban Runoff Pollution Control Ordinance of the LAMC (Chapter VI Article 4.4). This includes the implementation of erosion control measures, spill prevention and control, solid and hazardous waste management, and dust control to reduce the transport of pollutants and sediment from construction areas to the stormwater system. In compliance with the NPDES Construction General Permit, a SWPPP will be prepared for the project, submitted to the SWRCB, and the construction BMPs in the SWPPP implemented during construction activities. In addition, any groundwater extracted during excavation activities will be disposed of in accordance with the SWRCB's General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality. Compliance with these regulations (SC-HYD-1) will reduce stormwater pollutants from entering the storm

drain system serving the site. Less than significant impacts on surface water quality would occur during construction and no mitigation measures are required.

Operations

After construction is complete, the operation of the EBMF would result in stormwater quality similar to other industrial land uses. Pollutants would mainly come from vehicles and buses parked at the site and resulting from maintenance and bus washing activities. In compliance with the NPDES General Industrial Activity Storm Water Permit, a SWPPP would be prepared that identifies permanent BMPs that would be implemented at the site, including source control, treatment control, and management practices that would reduce pollutants in the stormwater. In addition, wastewater from the bus wash area would be directed into the sewer system (SC-HYD-2). Implementation of the proposed project would have less than significant impacts on water quality. No mitigation measures are required.

Standard Conditions

The following Standard Conditions would be incorporated into the project, as part of its compliance with existing regulations:

SC-HYD-1: In compliance with National Pollutant Discharge Elimination System (NPDES) No. CAS000002, the Contractor shall obtain coverage under the NPDES Construction General Permit and implement a Stormwater Pollution Prevention Plan (SWPPP) during construction activities. The SWPPP shall include appropriate Best Management Practices (BMPs) from the City's Reference Guide for Stormwater Best Management Practices. In addition, the Contractor shall comply with Order No. 2003-003-DWQ, including the terms and conditions of the general Waste Discharge Requirements of this order. Any groundwater extracted during excavation activities will be disposed of in accordance with the General Waste Discharge Requirements for discharges to land with a low threat to water quality.

SC-HYD-2: In compliance with National Pollutant Discharge Elimination System (NPDES) No. CAS000001, the City shall obtain coverage under the NPDES General Industrial Activity Storm Water Permit and implement a Stormwater Pollution Prevention Plan (SWPPP) during project operations. In addition, the on-site storm drainage shall be designed in compliance with LAMC Section 64.30 for requirements on the disposal of industrial wastewater and with the City's Low-Impact Development Ordinance for permanent site Best Management Practices (BMPs) that would allow the beneficial use of rainwater and urban runoff; reduce stormwater/urban runoff while improving water quality; promote rainwater harvesting; reduce off-site runoff and provide increased groundwater recharge; and reduce erosion and hydrologic impacts downstream.

Impacts would be less than significant with compliance with SC-HYD-1 and SC-HYD-2. No mitigation is required.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Reference: L.A. CEQA Thresholds Guide (Sections G.2, G.3 and G.4); LADWP 2020 UWMP; Department of Water Resources (DWR) Basin Prioritization.

Comment: A project would normally have a significant impact on groundwater supplies if it were to result in a demonstrable and sustained reduction of groundwater recharge capacity or change the potable water levels sufficiently that it would reduce the ability of a water utility to use the groundwater basin for public water supplies or storage of imported water, reduce the yields of adjacent wells or well fields, or adversely change the rate or direction of groundwater flow.

Less than significant impact. Water required for the operation of the proposed bus maintenance facility would be provided through the existing LADWP municipal water supply. Water demand from the project would be a minor amount when the project site is compared to the area of industrial developments in the City and the total citywide industrial water use (17,855 acre-feet (AF), which in turn, represents only 3 percent of the LADWP's total water demand (i.e., an average of about 495,685 AF of water annually from 2016-2020). In addition, the operation of the new EBMF would cease the requirement for water usage at the Compton Facility to maintain the LADOT bus fleet. Thus, the project would not create such a demand for water as to result in a depletion of existing groundwater supplies. The location of the maintenance facility on an existing developed and largely paved parcel within an established urban environment would not be used for groundwater recharge and would not interfere with groundwater recharge at off-site locations.

Impacts on groundwater resources would be less than significant and no mitigation is required.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on- or off-site?

Reference: L.A. CEQA Thresholds Guide (Sections G.1 and G.2); City of Los Angeles General Plan; City Stormwater Drainage Map Images.

Comment: A significant impact may occur if the project resulted in a substantial alteration of drainage patterns that resulted in a substantial increase in erosion or siltation during the construction or operation of the project.

Less than significant impact. The proposed maintenance facility would not alter the existing drainage pattern of the site or surrounding area. The facility would be constructed on previously developed parcels within an established urban setting and would maintain the existing drainage patterns, where runoff from the site flows into adjacent curbs and gutters toward the underground drainage line on East 111th Place that connects to Compton Creek. There are no streams or rivers present within the project limits.

Construction of the maintenance facility would result in temporary soil disturbance during which time a SWPPP for the control of soil erosion and sediment runoff would be implemented (SC-HYD-1). The project would be constructed in accordance with applicable requirements of the municipal code, including grading requirements. Impacts related to erosion would be less than significant, and no mitigation measure is required.

- ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?*

Reference: L.A. CEQA Thresholds Guide (Section G.1); City of Los Angeles General Plan; City Stormwater Drainage Map Images; FEMA's National Flood Hazard Layer (NFHL) Viewer.

Comment: A significant impact would occur if the proposed project resulted in increased runoff volumes during construction or operation of the proposed project that would result in flooding conditions affecting the project site or nearby properties.

Less than significant impact. The proposed bus maintenance facility would be constructed within an established urban environment on an existing developed parcel that is largely covered with impervious surfaces. The new facility would not increase impervious surfaces nor would it alter the existing drainage pattern of the site or area. Implementation of SC-HYD-1 would include LID features that would reduce runoff from the site. The runoff will continue to be directed towards curbs and gutters on East 111th Place toward the underground line that connects to Compton Creek. Additionally, based on the General Plan Safety Element Exhibit F (100-Year & 500-Year Flood Plains), the site is not located within a 100- or 500-year flood zone. No significant impacts would occur, and no mitigation measure is required.

- 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?*

Reference: L.A. CEQA Thresholds Guide (Sections G.1 and G.2); City Stormwater Drainage Map Images; FEMA's NFHL Viewer.

Comment: A significant impact would occur if the volume of runoff increased to a level, which exceeded the capacity of the storm drain system serving a project site. A significant impact would also occur if the proposed project substantially increased the probability that polluted runoff would reach the storm drain system.

Less than significant impact. The facility site is in a built-out area of the City on parcels that are largely paved and impermeable. The proposed project would retain the largely paved conditions at the site. Thus, the project would not increase the volume of stormwater runoff. With no major increase in impervious area, the proposed facility would not increase the amount of surface runoff nor provide an additional source of polluted runoff above the existing conditions. Also, compliance with SC-HYD-1 requires the project to include LID features that would reduce runoff from the site and improve stormwater quality. Runoff from the project site would be directed towards the existing storm drain on East 111th Place. No significant impacts on the capacity of the existing storm drainage system serving the site would occur, and no mitigation measure is required.

iv) Impede or redirect flood flows?

Reference: L.A. CEQA Thresholds Guide (Section G.1); City of Los Angeles General Plan; City Stormwater Drainage Map Images; FEMA's NFHL Viewer.

Comment: A significant impact would occur if the proposed project were placed within a 100-year flood hazard area or has structures that would impede or redirect flood flows.

No impact. The proposed facility would be constructed within an established urban environment on an existing parcel that is largely covered with impervious surfaces. Per the General Plan Safety Element Exhibit F (100-Year & 500-Year Flood Plains), the site is not located within a 100- or 500-year flood zone and therefore would not impede or redirect flood flows. With no increase in stormwater runoff from the site, no impact would occur, and no mitigation measure is required.

d) In flood hazard, tsunami, or seiche zones risk release of pollutants due to project inundation?

Reference: L.A. CEQA Thresholds Guide (Sections E.1, G.1 and G.2); City of Los Angeles General Plan Safety Element.

Comment: A significant impact may occur if the project were to be in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. A significant impact may occur if the project were to be in an area with inundation potential due to seiche, tsunami, or mudflow. A significant impact would occur if the proposed project would create a risk for the release of pollutants due to inundation when located in a flood hazard, tsunami, or seiche zone.

No impact. The project site is not located in an area subject to flood hazard, tsunami, or seiche risk. Based on the General Plan Safety Element Exhibit F (100-Year & 500-Year Flood Plains), the project site is not located within a 100- or 500-year flood zone. The project site is located over 9 miles inland from the coast making inundation by a tsunami unlikely. Per the General Plan Safety Element Exhibit G (Inundation & Tsunami Hazard Areas), the project site is not located within a tsunami inundation area. There are no nearby enclosed water bodies where a seiche could form. The

project site is flat and no potential source of mudflow has been identified. No impact would occur, and no mitigation measure is required.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Reference: L.A. CEQA Thresholds Guide (Section G.4); LADWP UWMP; DWR Basin Prioritization.

Comment: A significant impact could occur if the project includes potential sources of water pollutants that would have the potential to interfere with a water quality control plan or sustainable groundwater management plan.

No impact. The nearest water body to the proposed project site is Compton Creek, which is located approximately 0.2-mile north and 0.3-mile east. The Los Angeles RWQCB's Basin Plan identifies the following beneficial uses of Compton Creek: groundwater recharge (GWR), warm freshwater habitat (WARM), wildlife habitat (WILD), wetland habitat (WET). Because that project would not affect groundwater recharge in the area or wildlife habitats and wetlands in Compton Creek, implementation of the project would not impact any of the beneficial uses of Compton Creek nor conflict with the overall objectives of the Basin Plan.

The project site is not located within a high- or medium-priority groundwater basin and therefore, would not conflict with a Sustainable Groundwater Management Plan prepared by a groundwater sustainability agency. No impact would occur, and no mitigation measure is required.

3.12 Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Community Impact Assessment was prepared for the project and is provided in Appendix H. The findings of the study are summarized below.

3.12.1 Regulatory Setting

This section describes existing laws and regulations related to land use and planning that apply to the project.

3.12.1.1 Federal

There are no federal regulations that specifically address impacts related to land use and planning and apply to the project.

3.12.1.2 State

There are no state regulations that specifically address impacts related to land use and planning and apply to the project.

3.12.1.3 Regional

SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2020–2045 RTP/SCS is a comprehensive long-term transportation plan that provides a vision for the future of the SCAG region's multimodal transportation system and specifies how that vision can be achieved for the region. It combines land use and transportation strategies with options to increase mobility and achieve a more sustainable growth pattern. The RTP/SCS identifies major challenges, as well as potential opportunities associated with growth, transportation finances, the future of airports in the region, and impending transportation system deficiencies that could result from growth projections for the region.

3.12.1.4 Local

City of Los Angeles General Plan

The City's General Plan outlines the City's long-range goals and policies for the development of land within the City and addresses community development relative to the distribution of land use. The General Plan includes the Framework Element, Plan for a Healthy Los Angeles – Health and Wellness Element, Housing Element, Mobility Plan 2035 (i.e., Mobility Element), Noise Element, Air Quality Element, Conservation Element, Open Space Element, Safety Element, Infrastructure Systems Element, and Public Facilities and Services Element and 35 Community Plans that collectively comprise the Land Use Element of the General Plan.

Southeast Los Angeles Community Plans

The Southeast Los Angeles Community Plan serves as the Land Use Element of the City's General Plan and articulates the vision for long-term physical and economic development and community enhancement of the Southeast Los Angeles community. This Community Plan includes goals and policies addressing land use and urban design, mobility, community facilities, and infrastructure issues in the community. It designates the project site as Limited Industrial with a Manufacturing zone and classifies East 111th Place as a Collector Street.

Southeast Los Angeles CPIO

The Southeast Los Angeles CPIO District implements the goals and policies of the Southeast Los Angeles Community Plan and contains supplemental development regulations. The project site is located within this CPIO and is part of Subarea K – Compatible Industrial. This subarea applies to industrial uses located adjacent to residential neighborhoods and allows light industrial and commercial uses, while restricting noxious and other incompatible uses.

Los Angeles Zoning Regulations

The project site is zoned M1-1-CPIO (Limited Industrial-Height District 1-CPIO). Section 12.17.6 of the LAMC contains the development standards for the M1 zone. The standards include permitted uses, use restrictions, required lot areas, yard widths, and loading space. Requirements for off-street parking, building heights, landscaping, signs, and other overlay zones and building regulations are also outlined in the LAMC.

3.12.2 Existing Environment

The project site is developed with two industrial buildings that have been left vacant for approximately 2 years, but they are currently used as a logistics warehouse for solar panels. Land uses immediately adjacent to the site include the Animo James Taylor Charter Middle School to the east, East 111th Place and residential uses to the north, the Kedren Health Community Center and Head Start Preschool to the west, and the UPRR tracks, Lanzit Avenue, and residential uses to the south. The large undeveloped lot at the eastern end of East 111th Place and 109th Place (known as the Lanzit Industrial Site) is a City-owned property that was formerly in industrial use and

is planned for redevelopment, but it has remained undeveloped for more than 25 years.

Existing land uses in the surrounding area are shown in Figure 3.12-1 based on SCAG land use data and a review of 2021 aerial photographs. As shown, the project area is predominantly residential in land use, with commercial uses on major streets and industrial uses along the railroad tracks.

3.12.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project physically divide an established community?

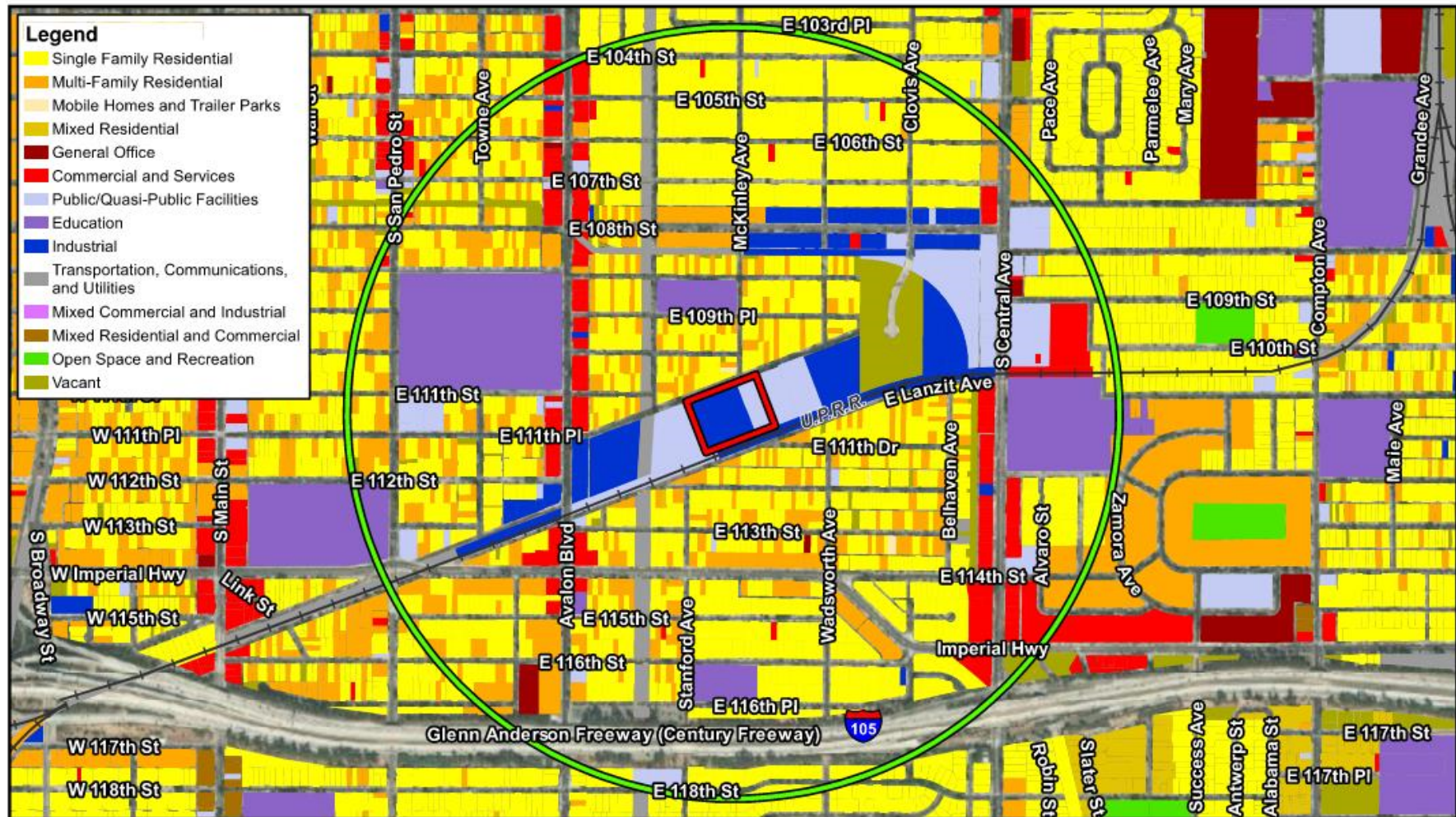
Reference: L.A. CEQA Thresholds Guide (2006) (Section H.2); City of Los Angeles General Plan; Southeast Los Angeles Community Plan; Community Impact Assessment (Parsons, 2022).

Comment: A significant impact on an established community could occur if the project includes features such as a highway, above-ground infrastructure, or an easement that would cause a permanent disruption to an established community or would otherwise create a physical barrier within an established community.

Less than significant impact. The proposed project would be constructed and operated on the existing parcels zoned for industrial uses. Therefore, it would not physically divide an established community. However, impacts to the area residents and businesses could occur as described in the following paragraphs.

In terms of access, during construction, access to adjacent land uses could be affected by sidewalk, roadway, and driveway improvements on East 111th Place. The lane restriping, sidewalk closures and related pedestrian detours could temporarily delay travel on East 111th Place and impede property access. Offsite construction equipment and activities could temporarily block vehicle access to the adjacent school, community center, and other developments (i.e., commercial and industrial uses on East 111th Place near Avalon Boulevard) in the immediate vicinity of the project site. This could indirectly impact the operations and businesses of adjacent properties. Implementation of a Traffic Management Plan (TMP) as described in SC-CC-1 would minimize traffic disruption. Maintenance of roadway and driveway access for adjacent land uses at all times during construction (SC-CC-2) and the provision of crossing guards (SC-CC-3) would ensure construction activities do not result in significant adverse impacts in terms of access to community facilities. A public liaison will be established to address any public concerns related to, but not limited to, access, noise, dust, or odor emanating from the construction activities. Notifications will be sent to nearby properties regarding construction dates and hours. Signage will be posted at the construction site regarding the project and contact information for the public liaison (SC-CC-4).

Figure 3.12-1: Existing Land Uses



In terms of community cohesion, the UPRR tracks immediately south of the project site serve as a barrier between the Green Meadows neighborhoods to the north and south. The project would be located immediately north of the tracks and would not divide existing neighborhoods. Thus, the EBMF is not expected to affect community cohesion, because it would not create any new barrier that would separate or isolate any of the adjacent resident populations physically or functionally from the rest of the community or from nearby services that are not already separated by the tracks. With no resident/household displacement or the creation of new barriers, the project is also not anticipated to lead to neighborhood fragmentation or the disruption of existing social patterns.

In terms of acquisition and displacement, the proposed project would require the acquisition of two industrial-use parcels, which are currently used as a logistics warehouse for solar panels. The lease is temporary, and the tenant is aware of the planned property acquisition; therefore, future displacement would be voluntary. No other property acquisitions are required; therefore, no resident or household displacement would occur. Temporary construction easements (TCEs) may be required on adjacent parcels during construction of the perimeter wall, but no displacement of community-serving businesses (e.g., adjacent community center/preschool and middle school) would occur.

In addition, the construction of the EBMF to support the use of BEBs for DASH and CE services would not result in the displacement of businesses. The EBMF would relocate 203 employees from the LADOT's Compton Facility to the site and add 109 new employees, for a total of 312 onsite employees. The relocated employees are not expected to move their place of residence because the new site is only 2 miles from the existing Compton Facility. Also, the new employees are expected to come from the local labor pool and jobs filled from among current unemployed persons in the study area, the City, County, and/or the region.

Standard Conditions

The following Standard Conditions shall be implemented, as standard measures for compliance with existing regulations:

- SC-CC-1:** In compliance with Section 601-1 of the Greenbook (*Standard Specifications for Public Works Construction*), the Contractor shall prepare a Transportation Management Plan (TMP) in consultation with the City of Los Angeles before construction. The TMP will be submitted with the construction plans and schedule to the Los Angeles Police and Fire Departments before the commencement of construction activities. The TMP will outline necessary street/lane closures and detours. In addition, detours around construction areas will be identified for bicyclists and pedestrians. Signs will be posted to direct bicyclists and pedestrians to sidewalks and intersections where they may safely cross. A restriction on large-size trucks shall also be imposed to confine travel to and from the construction site during off-peak commute times.

- SC-CC-2:** In compliance with Section 600 of the Greenbook (*Standard Specifications for Public Works Construction*), roadway and driveway access for adjacent land uses shall be maintained at all times during construction, and work shall be scheduled to avoid unnecessary inconvenience to residents, students, and users of abutting properties. Undue delays in construction activities shall be avoided to reduce the public's exposure to construction-related impacts.
- SC-CC-3:** In compliance with Section 5-7, Safety, of the Brownbook (*Additions and Amendments to the 2021 Edition of the Standard Specifications for Public Works Construction*), the contractor shall provide all safety measures necessary to protect the public and workers within the Work area. Particular attention is directed to the possibility of children playing or going to or from school in the Work area. The Contractor shall take all necessary precautions to ensure that its operations will not create a safety hazard for children. Crossing guards shall be placed at the project site driveways and the intersections of East 111th Place with McKinley Avenue and Stanford Avenue, leading to the nearby schools, when construction activities (e.g., sidewalk improvements and haul truck traffic) occur during school start and end times.
- SC-CC-4:** In compliance with the City of Los Angeles Building Regulations Ordinance No. 178,048 (LAMC Section 91.106.4.8), a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. A public liaison shall be appointed for project construction and shall be responsible for addressing public concerns about construction activities, including, but not limited to, access, excessive noise, dust, or odor. As needed, the liaison shall determine the cause of the concern (e.g., starting too early, bad muffler, blocked driveway) and implement measures, in consultation with the Contractor, to address the concern. Notices detailing the dates and hours of construction shall be sent to properties within 500 feet of the construction site. A project information sign shall be posted at the construction site and shall display the telephone number for the public liaison.

No significant adverse impacts related to land use and planning would occur, which would be ensured by compliance with SC-CC-1 through SC-CC-4, and no mitigation measure is required.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections H.1 and H.2), City of Los Angeles General Plan; Southeast Los Angeles Community Plan; LAMC, LAAC, SCAG RTP/SCS; Community Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the proposed project were inconsistent with the General Plan, or other applicable plans, or with the site's zoning if designated to avoid or mitigate a significant potential environmental impact.

Less than significant impact. A review of the City's land use plans and policies and other planning documents was made to determine the EBMF's consistency with these plans, policies, and regulations (see Appendix H for the Community Impact Assessment), a summary of which is provided below.

SCAG's RTP/SCS. The project would be consistent with SCAG regional goals because it would allow electric buses to provide transit services that connect transit users to key destinations and regional transportation connectors while reducing auto trips, vehicle miles traveled, and air emissions, thereby improving air quality, reducing GHG emissions, and promoting energy efficiency.

City of Los Angeles General Plan. The project as it relates to the provision of transit services as alternative transportation. Transit use would improve with the implementation of the project, thus satisfying goals for a multimodal transportation system. The project would improve air quality and reduce GHG emissions, energy use, and noise through the use of electric buses. The project could also serve as a catalyst for the revitalization of the site through the replacement of older structures at the site with new ones utilizing green technology and improving the abutting streetscape. As such, the Build Alternative is generally consistent with goals, objectives, and policies associated with improved transit services, green technology, reduced air pollution and GHG emissions, and decreased use of nonrenewable energy resources.

Southeast Los Angeles Community Plan. In accordance with the goals and policies in the Southeast Los Angeles Community Plan, the EBMF would improve LADOT transit service provision through a new and larger maintenance facility and would support the use of renewable energy (i.e., battery-powered electric buses), which in turn would reduce air pollutants, GHG emissions, noise, and nonrenewable energy consumption.

Subarea K – Compatible Industrial of the Southeast Los Angeles CPIO District allows warehouses and storage buildings with storage in an enclosed building; sets maximum building heights and density; and includes guidelines for building design, parking, signs, equipment, walls, lighting, and open storage. The Build Alternative would be designed to comply with applicable development regulations, environmental standards, and design guidelines for the Southeast Los Angeles CPIO District (SC-

LU-1), and CPIO approval would be obtained as part of the project approval. No conflict with the Southeast Los Angeles CPIO would occur.

Zoning Regulations. The project would not require changes in the zoning and land use designation of the site because the proposed project is a permitted use under the Limited Industrial land use designation and M1-1-CPIO zoning of the site. In addition, the project would comply with applicable zoning regulations. LAMC Section 12.17.6 includes regulations for parcels zoned as M1 – Limited Industrial. Subsection B.5 g) and h), which allow the parking of trucks or buses and public service utility yards “...when conducted wholly within a completely enclosed building or within an area enclosed on all sides with a solid wall or solid fence, not less than 6 feet in height, when no material or equipment is stored to a height greater than that of the enclosing wall or fence...” In addition, the project would be designed to comply with the height limitations and applicable CPIO development regulations (SC-LU-1).

No conflict with land use plans, policies, and programs would occur.

Standard Conditions

The project shall comply with the following Standard Condition to avoid conflict with adopted land use plans and policies:

SC-LU-1: The proposed project shall be designed and constructed in compliance with applicable design guidelines and development standards in the Southeast Los Angeles Community Plan, Southeast Los Angeles Community Plan Implementation Overlay District, and the City’s Zoning Regulations.

No significant adverse impacts related to land use and planning would occur, which would be ensured by compliance with SC-LU-1, and no mitigation measure is required.

3.13 Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.13.1 Regulatory Setting

This section describes existing laws and regulations related to mineral resources that apply to the project.

3.13.1.1 Federal

There are no federal regulations that specifically address impacts related to mineral resources and that apply to the project.

3.13.1.2 State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act of 1975 (SMARA) requires that the State Mining and Geology Board (SMGB) map areas throughout California that contain regionally significant mineral resources and adopt State policy for the reclamation of mined lands and the conservation of mineral resources. The primary objective of SMARA is for each jurisdiction to develop policies that will conserve important mineral resources, where feasible, that might otherwise be unavailable when needed.

The California Department of Conservation, California Geological Survey (CGS) is the agency responsible for providing information about the state's geology, seismology, and mineral resources, including their related hazards to the health, safety, and business interests of the residents of the state. The CGS operates several major programs including the Mineral Resources (and Mineral Hazards) Program. As mandated by the SMARA, the Mineral Resources Program provides data to federal, state, and local government agencies, industry, and the public about California's availability and consumption of non-fuel mineral resources (such as metals and industrial minerals), naturally occurring mineral hazards (such as asbestos, radon, and mercury), and information about active and historic mining activities throughout the state.

The project site is located within the San Gabriel Production-Consumption region but is outside areas where geologic data indicate that significant plain cement concrete (PCC)- grade aggregate resources are present (e.g., areas designated as Mineral Resources Zone [MRZ]-2).

3.13.1.3 Local

City of Los Angeles General Plan Conservation Element

The City's General Plan Conservation Element includes policies focused on the preservation of mineral resources and access to these resources. The Conservation Element notes that sand and gravel extraction occurred in the Arroyo Seco and Big Tujunga Wash areas in the early 1900s and sand and gravel resources from the adjacent mountains are available in the Tujunga alluvial fan. It identifies the locations of MRZ in the City. The Conservation Element also shows the general locations of Oil Drilling Districts, Surface Mining Districts, and State-designated oil fields within the City. The site is not within MRZ-2, an Oil Drilling District, Surface Mining District, or State-designated oil field.

Los Angeles Municipal Code

Section 13.01 of the LAMC protects the City's oil resources and has established a supplemental use district - "O" Oil Drilling District, where oil fields are known to be present and drilling operations are regulated. Section 13.03 of the LAMC protects the City's mineral resources and has established a supplemental use district - "G" Surface Mining Operations District, where surface mining operations are allowed subject to a permit. The site is not within an Oil Drilling District or Surface Mining Operations District.

3.13.2 Existing Environment

The project site is located within a developed urban area and has previously been disturbed by the construction of the existing industrial structures on the site. The General Plan Conservation Element Exhibit A (Mineral Resources) shows the site is not located within an identified MRZ-2 (where information indicates that mineral deposits are present or there is a high likelihood for their presence). The nearest MRZ-2 area is located north of the project site towards downtown Los Angeles and correlates with the presence of sand and gravel aggregate west of the Los Angeles River. There are no mining activities on or near the site.

The project site is not located within a City-designated oil or gas resource area, with the Rosecrans oil and gas field as the nearest oil and gas area, where numerous active wells are located. This area is approximately 1.4 miles southwest of the project site. There are no oil or gas wells on or near the site. The nearest well is a plugged oil and gas well on 116th Place, just west of Clovis Avenue (2,300 feet to the southeast of the site).

3.13.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.4); City of Los Angeles General Plan Conservation Element; LAMC; CDOC Wellfinder; CGS Information Warehouse: Mineral Land Classification.

Comment: A significant impact may occur if the proposed project is located in an area used or available for extraction of a regionally important mineral resource, if the project converts a regionally or locally important mineral extraction use to another use, or if the proposed project blocks or affects access to a mineral resource area.

Less than significant impact. The site is not located within an MRZ-2 or an oil or gas resource area. The development of an electric bus maintenance facility within a developed urban area of the city would not involve the extraction of mineral resources or result in the loss of availability of a known regional mineral resource.

While construction of the project would require mineral resources in the form of sand and gravel, as well as the use of oil resources as fossil fuels, this demand would be a minor amount of available resources in the region. Impacts would be less than significant and no mitigation measure is required.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.4); City of Los Angeles General Plan Conservation Element; LAMC; CDOC Wellfinder; CGS Information Warehouse: Mineral Land Classification.

Comment: See comment above.

No impact. Based on the General Plan Conservation Element, the site is not located within an MRZ-2 and the City has not designated a locally significant mineral resource on or near the site. In addition, there is no oil field underlying the site nor are there oil or gas wells on or near the site. The proposed project would have no impact on locally-important mineral resources. No mitigation measure is required.

3.14 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project result in:				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A Noise and Vibration Impact Analysis Technical Memorandum (Parsons 2021) was prepared for the project and is provided in Appendix I. The findings of the analysis are summarized below.

3.14.1 Regulatory Setting

This section describes existing laws and regulations related to noise that apply to the project.

3.14.1.1 Federal

Transit Noise and Vibration Impact Assessment Noise Impact Criteria

The noise impact criteria for transit projects, as prescribed in FTA's Transit Noise and Vibration Impact Assessment (FTA, 2018), are summarized in Table 3.14-1.

Table 3.14-1: FTA Land Use Categories

Land Use Category	Noise Metric, dBA	Description of Land Use Category
1	Outdoor $L_{eq}(h)^*$	Tracts of land where quiet is an essential element in their intended purpose. This category includes lands set aside for serenity and quiet, and such land uses as outdoor amphitheaters and concert pavilions, as well as National Historic Landmarks with significant outdoor use.
2	Outdoor L_{dn}	Residences and buildings where people normally sleep. This category includes homes, hospitals, and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.
3	Outdoor $L_{eq}(h)^*$	Institutional land uses with primarily daytime and evening use. This category includes schools, libraries, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material. Buildings with interior spaces where quiet is important, such as medical offices, conference rooms, recording studios, and concert halls fall into this category. Places for meditation or study associated with cemeteries, monuments, and museums. Certain historical sites, parks, and recreational facilities are also included.
Note: * L_{eq} for the noisiest hour of transit-related activity during hours of noise sensitivity. Source: FTA, 2018.		

L_{dn} is used to characterize noise exposure for residential areas, hotels, and hospitals where people normally sleep (Category 2). The maximum 1-hour average hourly L_{eq} during the period that the facility is in use is used for other noise-sensitive land uses such as schools, libraries, churches, and parks (Category 3). The noise impact criteria for human annoyance are based on a comparison of the existing outdoor noise levels and the future outdoor noise levels from a proposed transit project. They incorporate activity interference caused by the transit project alone and annoyance due to the change in the noise environment caused by the project. There are two levels of impact included in the FTA noise impact criteria, as shown in Figure 3.14-1.

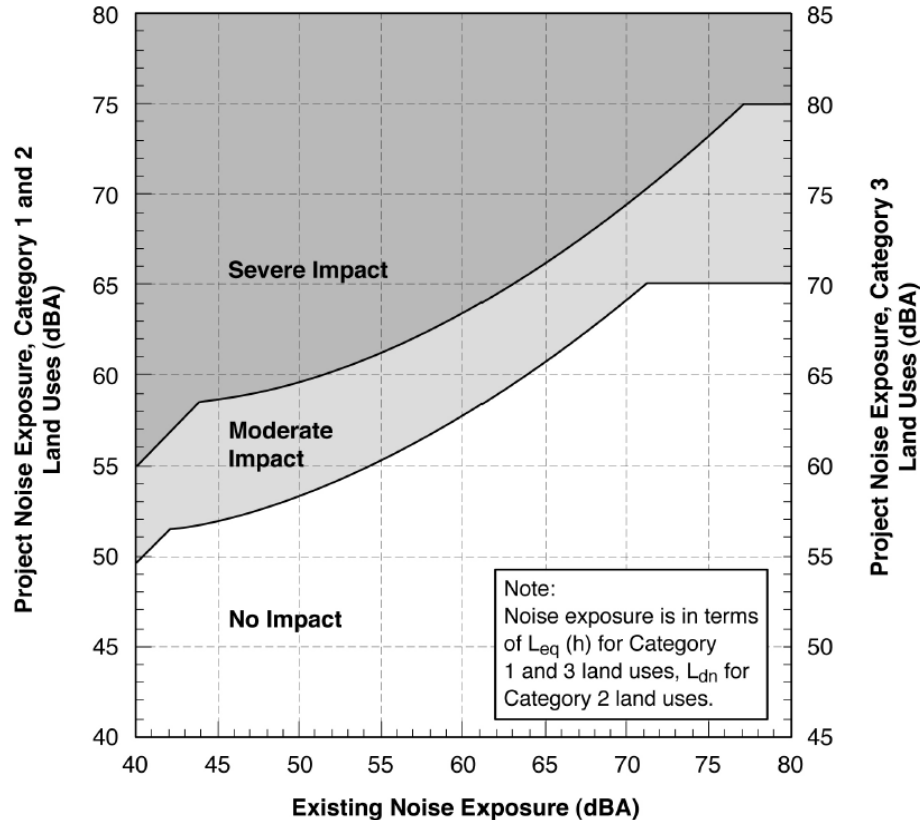
- Severe impact: Project noise above the upper curve is considered to cause severe impact because a significant percentage of people would be highly annoyed by the new noise. This curve flattens out at 75 dB for Category 1 and 2 land uses, a level associated with an unacceptable living environment.
- Moderate impact: The change in the cumulative noise level is noticeable to most people, but it may not be sufficient to cause strong, adverse reactions from the community. In this transitional area, other project-specific factors must be considered to determine the magnitude of the impact and the need for mitigation, such as the existing level, predicted level of increase over existing noise levels, and the types and numbers of noise-sensitive land uses affected.

Figure 3.14-1 illustrates that a project noise level of L_{dn} of 61 dBA at a Category 2 receptor would be considered as “moderate impact” if the existing L_{dn} of a selected

residence is 65 dBA. If the project noise level reaches an L_{dn} of 67 dBA, the project noise level would be considered as a “severe impact” to the Category 2 receptor.

Although the curves in Figure 3.14-1 are defined in terms of the project noise exposure and the existing noise exposure, it is important to emphasize that the increase in the cumulative noise (i.e., when the project noise is added to existing noise) is the basis for the criteria.

Figure 3.14-1: Noise Impact Criteria for Transit Projects



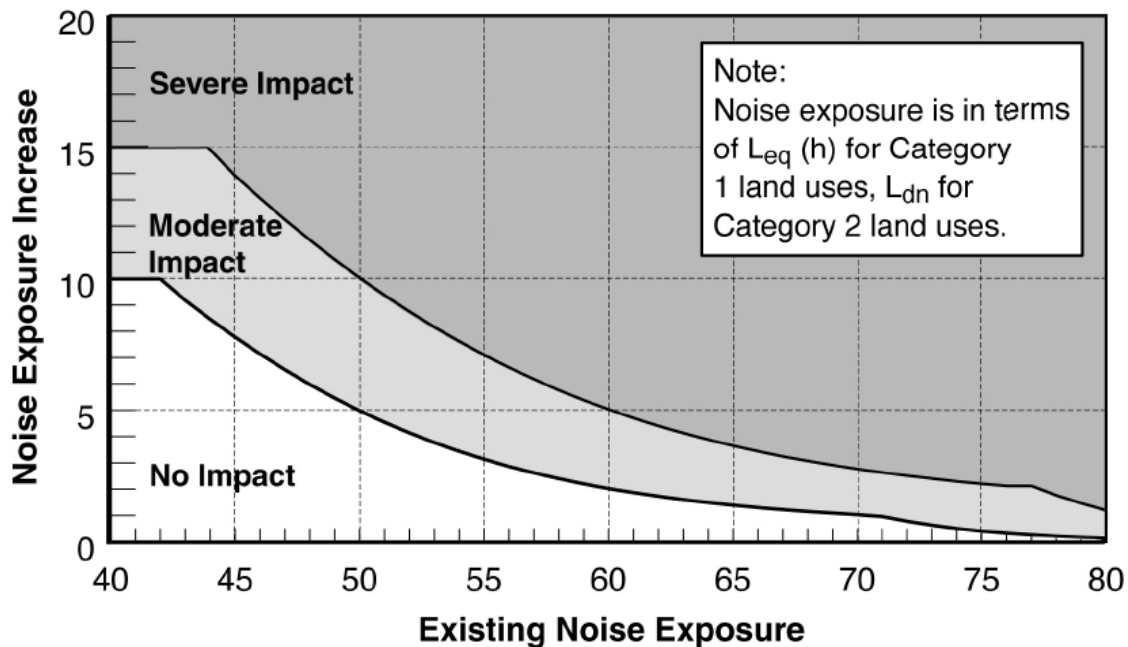
Source: FTA, 2018.

Figure 3.14-2 shows the noise impact criteria for Categories 1 and 2 land uses in terms of the allowable increase in the cumulative noise exposure. As shown, the criterion for moderate impact allows a noise exposure increase of 10 dB, if the existing noise exposure is 42 dBA or less, but only a 1-dB increase when the existing noise exposure is 70 dBA. As the existing level of ambient noise increases, the allowable level of project noise increases, but the total allowable increase in community noise exposure is reduced. This reduction accounts for the unexpected result – project noise exposure levels that are less than the existing noise exposure can still cause a moderate impact.

For residential land uses, the noise criteria are to be applied outside the building locations at noise-sensitive areas with frequent human use, including outdoor patios. If none is present, the criteria should be applied near building doors and windows. For parks and other significant outdoor uses, the criteria are to be applied at the property

lines; however, for locations where land use activities are solely indoors, noise impact may be less significant if the outdoor-to-indoor reduction is greater than for typical buildings (approximately 25 dB with windows closed or 12 dB with windows open).

Figure 3.14-2: Allowable Increase in Cumulative Noise Levels



Source: FTA, 2018.

Vibration Impact Criteria

The vibration impact criteria in the Transit Noise and Vibration Impact Assessment (FTA, 2018) are used to evaluate vibration impacts from the project's transit operations. The evaluation of vibration impacts can be divided into two categories: (1) human annoyance and (2) building damage. Generally, human annoyance criteria are used to assess potential impacts associated with operational vibration, whereas building damage criteria are used to estimate vibration impacts due to construction activities.

Human Annoyance

The ground-borne vibration impact criteria describe the human response to vibration and potential interference as it relates to the operation of vibration-generating equipment. Table 3.14-2 presents the criteria for various land use categories and frequency of events.

Table 3.14-2: Ground-Borne Vibration Impact Criteria For Human Annoyance

Land Use Category	Ground-Borne Vibration Impact Levels, VdB*		
	Frequent Events ¹	Occasional Events ²	Infrequent Events ³
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB ⁴	65 VdB ⁴	65 VdB ⁴

INITIAL STUDY
LOS ANGELES DEPARTMENT OF TRANSPORTATION

Land Use Category	Ground-Borne Vibration Impact Levels, VdB*		
	Frequent Events ¹	Occasional Events ²	Infrequent Events ³
<u>Category 2:</u> Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
<u>Category 3:</u> Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB
<p>Notes:</p> <p>1. "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.</p> <p>2. "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have these many operations.</p> <p>3. "Infrequent Events" is defined as more than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.</p> <p>4. This criterion limit is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.</p> <p>* Root-mean-square velocity in decibels (VdB) re: 1 micro-inch per second.</p> <p>Source: FTA, 2018.</p>			

Vibration-sensitive receptors include residences, hotels, schools, churches, libraries, and hospitals. These receptors fall under Category 2, places where people normally sleep, including hotels and hospitals, and Category 3, schools, churches, and parks with primarily daytime use. Because the number of proposed bus operations at the site is estimated at up to 150 electric buses per weekday, FTA would classify the proposed service as "Frequent Events." According to Table 3.14-2, the maximum vibration level cannot exceed 72 VdB for Category 2 land uses and 75 VdB for Category 3 land uses.

Building Damage

Vibration resulting from electric bus operations on city streets would not cause building damage because the vibration impact from rubber tire-fitted vehicles is extremely rare. This is because rubber tire-fitted vehicles are not very massive and they are typically well isolated by the vehicle suspension design and rubber tires, which act as a highly effective barrier to vibration transmission from the vibration-generating carriage and the main propagation medium for vibration excitation – the ground. Potential vibration impact for building damage from rubber tire-fitted vehicles such as those proposed for this project can be reasonably dismissed under general conditions.

Construction activities can result in varying degrees of ground vibration, depending on the equipment used and the method employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings founded on the soil near the construction site respond to these vibrations with varying results, ranging from no perceptible effects at the lowest levels, perceptible vibrations at moderate levels, and slight damage at the highest levels.

Per the FTA noise and vibration assessment manual, ground vibrations from construction activities do not often reach the levels that can damage structures, and

the vibration associated with typical construction is not likely to damage building structures. Vibrations generated by construction activities are mainly in the form of surface or Raleigh waves. The FTA manual states that peak particle velocity (ppv) correlates best with building damage and complaints. Table 3.14-3 summarizes the construction vibration limits shown in FTA guidelines for structures located near a transit project.

Table 3.14-3: FTA Construction Vibration Damage Criteria

Building Category	Peak Particle Velocity, in/sec	Approximate Lv*, VdB
I. Reinforced-concrete, steel, or timber (no plaster)	0.50	102
II. Engineered concrete and masonry (no plaster)	0.30	98
III. Non-engineered timber and masonry buildings	0.20	94
IV. Buildings extremely susceptible to vibration damage	0.12	90
Note: * Root-mean-square velocity in decibels (VdB) re: 1 micro-inch per second. Source: FTA, 2018.		

3.14.1.2 State

California Planning and Zoning Law

The California Planning and Zoning Law requires each local government entity to adopt a Noise Element as part of its General Plan. State land use guidelines for evaluating the compatibility of various land uses as a function of community noise exposure are generally incorporated into adopted Noise Elements.

3.14.1.3 Local

City of Los Angeles General Plan Noise Element

The City's General Plan Noise Element identifies ambient noise levels and major noise sources (e.g., vehicles, rail systems, and airports) in the City and sets goals, objectives, and policies for reducing intrusive noise and the noise impacts of development and changes in land use, and its effects on noise-sensitive land uses.

City of Los Angeles Noise Ordinance

LAMC Chapter IV, Article 1, Section 41.40; and Ordinance No. 161,574 and amended Ordinance No. 156,363 (the City Noise Ordinance) address noise generated at construction sites, including permissible hours of construction. In addition, operational noise from stationary and mobile sources is regulated by the City.

LAMC Section 112.05 states that construction and industrial machinery shall not exceed a maximum of 75 dBA at a distance of 50 feet in a residential zone or within 500 feet of a residential zone, except where compliance is technically infeasible. In addition, LAMC Section 41.40, as referenced, restricts construction activities during

different hours of the day (i.e., no person shall perform any construction or repair work that makes loud noises that disturb persons occupying sleeping quarters in any place of residence between the hours of 9:00 p.m. of one day and 7:00 a.m. of the following day).

LAMC Section 112.02 states that operational noise (e.g., heating, ventilation, and air conditioning [HVAC] equipment) shall not cause the noise level on the premises on any other occupied property to exceed the ambient noise level by more than 5 dBA. LAMC Section 112.04 also restricts mechanical noise between the hours of 10:00 p.m. and 7:00 a.m. of the following day. Excess noise during this period is defined as loud, raucous, or impulsive sound within a residential zone or within 500 feet of a residential zone.

The project design shall comply with a construction management plan that includes project design conditions, as necessary, to protect the health, safety, or convenience of affected sensitive receptors, located in the neighborhood that surrounds the project. General conditions to control construction noise and vibration, as may be listed in the construction management plan specifications, could include:

- 1) Construction or use of temporary noise barriers, enclosures, or sound blankets
- 2) Use of low noise, low vibration, low emission-generating construction equipment (e.g., quieter) Tier 4 engines, as needed
- 3) Maintenance of mufflers and ancillary noise-abatement equipment
- 4) Scheduling high noise-producing activities during periods that are least sensitive when most people are at work during daytime hours
- 5) Routing construction-related truck traffic away from noise-sensitive areas
- 6) Reducing construction vehicle speeds
- 7) Locating equipment as far as feasible from sensitive receptors

Design methods that shall be considered to further lower operations noise levels may include but are not limited to:

- 1) Selecting mechanical equipment designed to produce low noise levels. This includes mechanical (i.e., HVAC) equipment for heating and cooling interior spaces.
- 2) Locating mechanical equipment inside the building or shielding it with screens; walls, including parapet walls for rooftop equipment; acoustical louvers; or other noise-control devices.
- 3) Designing the building shell to contain noise within the building. This includes proper specifications for windows, doors, and ventilation systems.
- 4) Limiting the maximum noise levels that may be produced by activities within the project.

- 5) Orienting doors, windows, and other openings away from NSLUs. Where windows or emergency doors need to be oriented toward homes or other noise-sensitive uses, ensure they remain closed when not in use.
- 6) Considering all of the above noise control methods in the final architectural and engineering designs and specifications for project construction.

3.14.2 Existing Environment

The project site is developed with two industrial buildings that are currently used as a logistics warehouse for solar panels. Noise-sensitive land uses (NSLUs) within 500 feet of the project site include single-family residences to the north along East 111th Place and the south along East Lanzit Avenue, a community center to the west, and a school to the east, both along East 111th Place.

Noise monitoring was conducted by Greg Berg, Parsons noise specialist, at the project area on June 7 and 8, 2021, to determine the existing ambient exterior noise levels. Noise monitoring was conducted for a 24-hour period (long-term) and during off-peak traffic conditions (short-term) at several NSLUs to establish the baseline conditions. The long-term measurement was conducted to establish the upper and lower ambient noise-level ranges in the project area during daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) hours and to adjust the short-term measurements to the lowest daytime and nighttime noise levels to which predicted noise levels from project-related construction activities and operations can be compared.

Based on the measured noise levels, the project area has an exterior (outside) ambient noise level between 59 and 62 dBA during the daytime hour of 7:00 p.m. and between 53 and 56 dBA during the nighttime hour of 5:00 a.m., depending on location.² Measured and adjusted project site noise levels at the NSLUs are shown in Table 3.14-4, and noise monitoring locations are shown in Figure 3.14-3.

Table 3.14-4: Measured Noise Levels at Noise-Sensitive Land Uses

Noise Measurement Site	Noise Sensitive Location	Measurement Date	Start Time ¹	Measured Ambient Noise Level, Leq, dBA	Adjusted Daytime Ambient Noise Level, Leq, dBA ²	Adjusted Nighttime Ambient Noise Level, Leq, dBA ³	Adjusted Ambient Noise Level, Ldn / (Leq), dBA ⁴
ST1	710 E 111th Place	06/07/21	11:20	57	59	53	62 / (59)
ST2	810 E 111th Place	06/08/21	8:20	55	59	53	62 / (61)
ST3	745 E 111th Place	06/08/21	9:00	56	62	56	63 / (61)
ST4	750 E Lanzit Avenue	06/07/21	13:00	60	61	55	64 / (63)

Notes:

1 - Duration of measurement was 20 minutes.

2 - Daytime ambient was adjusted from the 7:00 p.m. hour which is the assumed daytime hour with the highest electric bus traffic volumes.

3 - Nighttime ambient was adjusted from the 5:00 a.m. hour which is the assumed nighttime hour with the highest electric bus traffic volumes.

4 - Ldn is provided for Category 2 receptors; Peak-hour Leq is provided for nearby Category 3 receptors per FTA manual.

Figure 3.14-3: Noise Monitoring Locations



3.14.3 Impact Analysis

3.14.3.1 CEQA Thresholds

According to the L.A. CEQA Thresholds Guide (2006), a project would normally have a significant effect on construction noise if:

- Construction activities lasting more than 1 day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise-sensitive use;
- Construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise-sensitive use; or
- Construction activities would exceed the ambient noise level by 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 any time on Sunday.

The proposed project would be under construction for 24 months; thus, construction activities would last longer than 10 days in a 3-month period. Therefore, the first and second bulleted threshold above applies to the proposed project. Because construction activities and deliveries would be restricted to 7:00 a.m. to 5 p.m. on weekdays, with no work on weekends and holidays, the third bulleted threshold does not apply.

According to the L.A. CEQA Thresholds Guide (2006), a project would normally have a significant operational noise impact if the project causes:

- The ambient noise level measured at the property line of affected uses to increase by 3 dBA in community noise equivalent level (CNEL) to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase.

Additionally, the City Noise Ordinance, Section 112.02 states that operational noise (e.g., bus maintenance and repairs) shall not cause the noise level on the premises of any occupied property other than the site to exceed the ambient noise level by 5 dBA or more. This threshold is more conservative than the CEQA Threshold Guide of 5 dBA at an affected land use in that the noise increase is measured at the nearest occupied property rather than the nearest sensitive land use (i.e., NSLU or affected use). An NSLU may be farther away than the next occupied property. Therefore, LAMC Section 112.02 is being used for an operational threshold in this screening assessment. LAMC Section 112.04 also restricts excess mechanical noise between the hours of 10:00 p.m. and 7:00 a.m. of the following day in residential zones and within 500 feet of a residential zone. Excess noise during this period is defined as loud, raucous, or impulsive sounds. The qualitative threshold is also being used for nighttime operational noise.

3.14.3.2 Methodology

Operations

Operations noise from the EBMF is expected to be generated by the electric buses entering and leaving the maintenance facility, as well as activities within the maintenance facility itself. This analysis considers the aggregate of the electric bus noise emanating from a line source as well as maintenance facility noise emanating from a single point-source at approximately pedestrian height (i.e., approximately 5 ft). The effects of air and ground acoustical absorption are conservatively excluded from the point-source sound propagation algorithm. Operational noise analysis follows FTA procedures and is calculated from the FTA noise model.

Construction

Construction noise from the proposed project construction was predicted with a technique based on the FTA “general assessment” method that focuses on the anticipated equipment and vehicles on site per phase. Consistent with data provided by the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) (FHWA, 2006), the predictive analysis for this study also applies the “acoustical usage factor” to calculate an equivalent sound level (L_{eq}) for a typical hour during which the construction equipment is expected to generate noise. Other included analysis factors are as follows:

- On average, equipment noise emanates from a single point at the geographic center of the nearest activity, illustrated as construction activity focal points on Figure 3.14-3, representing the mobility of construction activities and equipment locations across the entire project area as work proceeds;
- Point-source sound propagation and the source emission point is 6 feet above grade;
- First-floor receivers are 5 feet above property grade;
- The effect of acoustical ground and air absorption is conservatively not included.

The proposed project construction activities are expected to involve the use of various equipment, including a backhoe, paver, generators, compressors, rollers, skid loaders, and trucks. Reference maximum noise levels for such conventional construction equipment range between 74 and 81 dBA at a distance of 50 ft from the sound-producing source (FHWA, 2018).

3.14.3.3 Responses to CEQA Checklist

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project result in the 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?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections I.1 to I.4); City of Los Angeles General Plan Noise Element; City Noise Ordinance; Noise and Vibration Impact Analysis (Parsons, 2022).

Comment: A significant impact would occur if the project exposed persons to or generated noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The City's Noise Ordinance in LAMC Section 112.05 states that construction machinery shall not exceed a maximum of 75 dBA at a distance of 50 feet in a residential zone. If the estimated construction noise level exceeds the 75-dBA threshold at 50 feet, a noise impact would be assumed to occur.

Less than significant impact with mitigation incorporated. The project would generate noise during construction and operations and maintenance activities.

Construction Noise

The proposed project construction activities are expected to involve the use of various equipment, including a backhoe, paver, generators, compressors, rollers, skid loaders, and trucks. Reference maximum noise levels for such conventional construction equipment range between 74 and 81 dBA at a distance of 50 feet from the sound-producing source (FHWA, 2018).

During the construction period, the projected construction activity noise levels have been calculated to be up to 83 dBA at 50 ft, as shown in Table 3.14-5.

The surrounding NSLUs located adjacent to the project site are 265 to 315 feet from the center of construction activity within the site; thus, they may experience temporary exterior noise levels of approximately 67 to 68 dBA L_{eq} from the operation of the loudest expected construction equipment during hours as allowed by the City of Los Angeles. Table 3.14-6 presents the estimated noise levels for project construction at the noise-sensitive land uses.

INITIAL STUDY
LOS ANGELES DEPARTMENT OF TRANSPORTATION

Table 3.14-5: Estimated Construction Noise Levels

Construction Activity Equipment	Number of Equipment Used	Sound Level at 50 ft (dBA)	Usage Factor ¹	Effective Usage Factor ²	Leq, dBA ^{3, 4}	
					@ 50 ft	@ 100 ft
<u>O&M Facility Construction</u>						
<u>Demolition of Existing Facility</u>						
Pavement Breaker	2	82	0.3	0.15	74	68
Front-end loader	2	79	0.5	0.30	74	68
Dozer	1	80	0.5	0.15	72	66
Dump Truck	2	88	0.3	0.15	80	74
Overall Leq =					82	76
Noise Impact Distance⁵ = 110 ft						
<u>Removal of Pavement</u>						
Pavement Breaker	2	82	0.5	0.30	77	71
Dozer	1	80	0.3	0.08	69	63
Dump Truck	2	88	0.3	0.15	80	74
Overall Leq =					82	76
Noise Impact Distance⁵ = 105 ft						
<u>Excavation and Site Grading</u>						
Backhoe	2	80	0.5	0.30	75	69
Compactor	2	82	0.3	0.15	74	68
Grader	1	85	0.5	0.15	77	71
Front-end loader	2	79	0.3	0.15	71	65
Overall Leq =					81	75
Noise Impact Distance⁵ = 90 ft						
<u>Foundation</u>						
Utility Truck	2	84	0.3	0.15	76	70
Concrete Mixer	1	85	0.5	0.15	77	71
Saw	2	78	0.3	0.15	70	64
Overall Leq =					80	74
Noise Impact Distance⁵ = 85 ft						
<u>Structure Construction</u>						
Crane, Derrick	1	88	0.5	0.15	80	74
Saw	2	78	0.3	0.15	70	64
Utility Truck	2	84	0.5	0.30	79	73
Overall Leq =					83	77
Noise Impact Distance⁵ = 115 ft						

Notes:

- 1 - Usage factor is a percentage of time of the 8-hour construction period through which a hypothetical receptor would be noise impacted by the piece of equipment concerned. This value cannot exceed 0.5 in practical terms.
- 2 - Assuming that the equipment are operating at, or near, their maximum sound levels 30 percent of the time during operation except for the compressor, roller, and generator. These 3 pieces of equipment were assumed to be operational
- 3 - Calculated noise levels do not assume any mitigation measures.
- 4 - Distance is measured from the geometric center of construction activities.
- 5 - Based on the construction noise limit criteria of 80 dBA for daytime hours at residential land uses. Distances are measured from the center of the noise producing activities associated with the construction phase.

Source: Parsons

Table 3.14-6: Estimated Construction Noise Levels

Noise Sensitive Location	Lowest Daytime Ambient Noise Level, Leq, dBA	Distance to NSLU, feet	Loudest Construction Phase Noise Level at NSLU, Leq, dBA ¹	Unmitigated Noise Level Increase, Leq, dB	Compliant with CEQA Threshold (Outdoor Ambient < 5 dBA)
710 E 111th Place	53	295	67	14	No
810 E 111th Place	53	285	67	14	No
745 E 111th Place	56	265	68	12	No
750 E Lanzit Avenue	55	315	67	12	No

As shown in Table 3.14-6, ambient noise levels within the project vicinity range from 53 to 56 dBA, and construction-related noise are estimated to be 67 to 68 dBA. Because the projected construction noise levels are expected to be 12 to 14 dBA above existing ambient noise levels and above CEQA thresholds of less than a 5-dBA increase at noise-sensitive receptors, the project is anticipated to have a significant effect associated with unmitigated construction noise. Construction of a temporary noise barrier, which includes noise barrier fences, moveable noise barriers, and noise control curtains, with an effective height of 12 ft around the perimeter of the construction site should be implemented before the start of construction (MM-NOI-1). Temporary noise barriers may be made, for example, of concrete jersey barriers with 0.75-inch plywood attached to fence posts, and noise control curtain material may be mounted or hung over perimeter chain-link fences. Additionally, a public liaison would be appointed to address public concerns related to construction activities including excessive noise (SC-CC-4). Table 3.14-7 presents the estimated mitigated noise levels for project construction at the nearby noise-sensitive land uses.

Table 3.14-7: Estimated Mitigated Construction Noise Levels

Noise Sensitive Location	Lowest Daytime Ambient Noise Level, Leq, dBA	Distance to NSLU, feet	Loudest Construction Phase Noise Level at NSLU, Leq, dBA ¹	Mitigation Measure*	Mitigated Construction Noise Level at NSLU, Leq, dBA	Mitigated Noise Level Increase, Leq, dB	Compliant with CEQA Threshold (Outdoor Ambient < 5 dBA)
710 E 111th Place	53	295	67	12-Foot Barrier	51	-2	Yes
810 E 111th Place	53	285	67	12-Foot Barrier	51	-2	Yes
745 E 111th Place	56	265	68	12-Foot Barrier	59	3	Yes
750 E Lanzit Avenue	55	315	67	12-Foot Barrier	59	4	Yes

* - Mitigation measure would be located along the construction site perimeter.

Construction-related noise impacts would be less than significant after mitigation.

Operations Noise

CEQA impact analysis is applied to the project using the measured existing ambient noise levels at the project vicinity. Figure 3.14-3 shows the locations of nearby noise-sensitive receptors. For this analysis, it is assumed that an average of six buses would be cleaned, washed, and/or possibly provided preventive maintenance and repairs in a given hour for 24 hours per day. Based on the existing bus schedule of the South Yard facility, it is assumed that approximately 57 and 67 buses would arrive and depart the maintenance facility during daytime and nighttime hours, respectively, and it is assumed that 7:00 p.m. and 5:00 a.m. would be the times with the loudest operational noise levels. Electric buses are also assumed to be traveling at 20 miles per hour (mph) near the maintenance facility.

Table 3.14-8 presents the estimated noise levels from the maintenance facility and BEB operations at the NSLUs during the daytime hour of 7:00 p.m., and Table 3.14-9 presents the estimated noise levels during the nighttime hour of 5:00 a.m.

Table 3.14-8: Estimated Operations Noise Levels at Noise-Sensitive Land Uses during Daytime Hours

Noise Sensitive Location	Daytime Ambient Noise Level, Leq, dBA ¹	Distance to Property Line, feet ²	Operational Noise Level at Property Line, Leq, dBA	Compliant with CEQA Threshold (Outdoor Ambient < 5 dBA)
710 E 111th Place	59	30 / 265	55	Yes
810 E 111th Place	59	225 / 285	47	Yes
745 E 111th Place	62	30 / 270	57	Yes
750 E Lazit Avenue	61	550 / 315	45	Yes

1 - Daytime ambient was adjusted from the 7:00 p.m. hour which is the assumed hour with the highest electric bus traffic volumes.

2 - Distance to electric bus operations / distance to maintenance facility.

Table 3.14-9: Estimated Operations Noise Levels at Noise-Sensitive Land Uses during Nighttime Hours

Noise Sensitive Location	Daytime Ambient Noise Level, Leq, dBA ¹	Distance to Property Line, feet ²	Operational Noise Level at Property Line, Leq, dBA	Compliant with CEQA Threshold (Outdoor Ambient < 5 dBA)
710 E 111th Place	53	30 / 265	55	Yes
810 E 111th Place	53	225 / 285	47	Yes
745 E 111th Place	56	30 / 270	58	Yes
750 E Lazit Avenue	55	550 / 315	45	Yes

1 - Nighttime ambient was adjusted from the 5:00 a.m. hour which is the assumed hour with the highest electric bus traffic volumes.

2 - Distance to electric bus operations / distance to maintenance facility.

With ambient noise levels and project-generated noise combined, Tables 3.14-10 and 3.14-11 present the estimated cumulative noise levels of ambient noise and operational noise levels at the NSLUs during daytime and nighttime hours, respectively.

Table 3.14-10: Estimated Cumulative Noise Levels at Noise-Sensitive Land Uses during Daytime Hours

Noise Sensitive Location	Daytime Ambient Noise Level, Leq, dBA ¹	Operational Noise Level at Property Line, Leq, dBA	Cumulative Daytime Noise Level, Leq, dBA ¹	Compliant with CEQA Threshold (Outdoor Ambient < 5 dBA)
710 E 111th Place	59	55	60	Yes
810 E 111th Place	59	47	59	Yes
745 E 111th Place	62	57	63	Yes
750 E Lazit Avenue	61	45	61	Yes

1 - Daytime ambient was adjusted from the 7:00 p.m. hour which is the assumed hour with the highest electric bus traffic volumes.

Table 3.14-11: Estimated Cumulative Noise Levels at Noise-Sensitive Land Uses during Nighttime Hours

Noise Sensitive Location	Daytime Ambient Noise Level, Leq, dBA ¹	Operational Noise Level at Property Line, Leq, dBA	Cumulative Nighttime Noise Level, Leq, dBA ¹	Compliant with CEQA Threshold (Outdoor Ambient < 5 dBA)
710 E 111th Place	53	55	57	Yes
810 E 111th Place	53	47	54	Yes
745 E 111th Place	56	58	60	Yes
750 E Lazit Avenue	55	45	55	Yes

1 - Nighttime ambient was adjusted from the 5:00 a.m. hour which is the assumed hour with the highest electric bus traffic volumes.

As shown, cumulative operational noise levels would not exceed City standards and thus, operational noise impacts would be less than significant.

b) Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections I.1 and I.2); City of Los Angeles General Plan Noise Element; City Noise Ordinance; FHWA RCNM User's Guide, FTA Transit Noise and Vibration Impact Assessment; Noise and Vibration Impact Analysis (Parsons, 2022).

Comment: A significant impact would occur if the project exposed persons to or generated excessive groundborne vibration or groundborne noise levels.

Less than significant impact. No pile-driving or blasting activities are proposed that may result in ground-borne vibration. Equipment and vehicles to be used for construction are listed in Table 3.14-5. The anticipated ground vibration due to the operation of the construction equipment and vehicles on the proposed project site has been predicted with a technique based on the FTA “general assessment” method and available data for construction activities. Among the construction equipment and vehicles shown in Table 3.14-5, during some of the activities, loaded trucks would be expected to produce the largest magnitude of vibration. FTA guidance indicates that such equipment produces a reference vibration velocity level of 86 VdB at a distance of 25 ft. However, it is assumed that the loaded trucks would not be operating closer than an estimated 50 ft to the nearest façade of the closest vibration-sensitive building. Because construction would be short-term and temporary, the vibration velocity level as perceived by nearby building occupants would be approximately 77 VdB, which is less than the 80-VdB threshold/vibration velocity levels for “Infrequent Events” from the most vibratory of onsite construction equipment.

The vibration velocity level would also be considerably less than the 94-VdB threshold/vibration velocity levels that may result in building damage from the most vibratory of onsite construction equipment (see Table 3.14-5). Therefore, operating equipment associated with the construction of the project is not expected to result in significant annoyance to nearby building occupants nor result in building damage.

In addition, long-term operation at the site (e.g., electric bus parking and charging, and inspection and maintenance activities) would not produce vibration. Thus, it is not anticipated that there would be any excessive ground-borne vibration or ground-borne noise levels due to the construction of the maintenance facility or operations of the electric buses and maintenance facility.

Vibration impacts would be less than significant and no mitigation is required.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections I.1, I.2, and I.4); City of Los Angeles General Plan Noise Element; Southeast Los Angeles Community Plan; City Noise Ordinance; Noise and Vibration Impact Analysis (Parsons, 2022).

Comment: A significant impact would occur if the project exposed people residing or working in the project area to excessive noise levels due to the project site being located within an airport land use plan or within two miles of a public airport where such a plan has not been adopted.

No impact. No impact is anticipated because the project site is not located within a public airport land use plan area or 2 miles of a public airport, and it is not located within the vicinity of a private airstrip. The nearest public airport is Hawthorne Municipal Airport (also known as Jack Northrop Field) located at 12101 South Crenshaw Boulevard in Hawthorne, California (approximately 3.9 miles to the west/southwest of the EBMF project site). Additionally, the Los Angeles International Airport (LAX), located at 1 World Way in Los Angeles, California, is 8.4 miles west of the project site. The closest private airstrips are Compton/Woodley Airport in Los Angeles, approximately 3.3 miles south of the project site, and the Prairie Gate at the Hawthorne Airport in Hawthorne, approximately 3.9 miles east of the project site. Persons who reside in the area or would be working at the site would not be exposed to excessive noise levels from airport and aircraft operations.

No impacts related to noise from airport or aircraft operations would occur and no mitigation is required.

3.14.4 Mitigation Measure

The following mitigation measure shall be implemented before and during construction activities:

MM-NOI-1: To minimize noise impacts to area residents during project construction, the Contractor shall install a temporary noise barrier, which includes noise barrier fences, moveable noise barriers, and/or noise control curtains, with an effective height of 12 feet around the perimeter of the construction site. Temporary noise barriers may be made, for example, of concrete jersey barriers with 0.75-inch plywood attached to fence posts, or the noise control curtain material may be mounted or hung over perimeter chain-link fences.

Construction noise impacts would be less than significant after mitigation.

3.15 Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.15.1 Regulatory Setting

This section describes existing laws and regulations related to population and housing that apply to the project.

3.15.1.1 Federal

There are no federal regulations related to population and housing that apply to this project.

3.15.1.2 State

There are no State regulations related to population and housing that apply to this project.

3.15.1.3 Regional

SCAG Projections

SCAG is responsible for preparing the Regional Comprehensive Plan, RTP/SCS, and Regional Housing Needs Assessment (RHNA) in coordination with other State and local agencies. These planning documents include population, employment, and housing projections for the region for use by local agencies and public service agencies, and utility companies in projecting future service demands. Projections in SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) serve as the basis for demographic estimates.

3.15.1.4 Local

City of Los Angeles General Plan Housing Element

The City's General Plan Housing Element outlines the City's goals, objectives, policies, and programs for the conservation, preservation, and provision of adequate housing to meet the existing and future needs of the City.

3.15.2 Existing Environment

The California Department of Finance (DOF) estimates the City's January 2021 population at 3,923,341 persons, which includes 3,847,606 persons in households and 75,735 persons in group quarters. The City's housing stock consists of 1,535,606 dwelling units, of which 562,721 are single-detached units, 88,926 are single-attached units, 140,936 are two to four units; 732,939 are five or more units, and 10,084 are mobile homes. The City's housing stock has a 7.7 percent vacancy rate and the average household size is 2.72 persons per household. In September 2020, SCAG projected the population of the City to reach 4,771,000 persons by the year 2045, along with 1,793,000 households and 2,135,900 jobs.

The 2019 resident population and housing stock of the Southeast Los Angeles community is estimated at 301,512 residents and 74,232 housing units. There are no dwelling units at the site and the site was recently leased and the existing industrial buildings are used as a logistics warehouse for solar panels.

3.15.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project 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)?

Reference: L.A. CEQA Thresholds Guide (2006) (Section J.1); City of Los Angeles General Plan; Southeast Los Angeles Community Plan, SCAG RTP/SCS; EDD Unemployment Data; Community Impact Assessment (Parsons, 2022).

Comment: The inducement of substantial unplanned growth and development from a project may have a significant impact on housing, roads, and other infrastructure, as well as environmental resources, by creating growth that was not previously anticipated in the General Plan or relevant Community Plan.

Less than significant impact. The project does not include the construction or occupancy of any housing units. No extension of roads or other infrastructure that could potentially induce population growth is proposed. Rather, the project would replace the existing industrial structures with a bus maintenance facility. Construction activities will generate a temporary demand for construction workers and long-term

operation of the facility is anticipated to bring in 312 employees to the site (including the 203 employees at the South Yard who will be transferred to the EBMF). The temporary construction jobs and 109 new permanent jobs created by the project would be a minor increase in local jobs and is not expected to result in significant adverse impacts related to growth inducement, but it would be a beneficial impact for providing local employment opportunities. Also, It is anticipated that most workers filling the construction jobs would reside within the region or live in relative proximity to the project site. The temporary jobs generated by the construction of the proposed project are not anticipated to result in a direct demand for additional housing or cause unplanned growth in the project area.

The 109 new jobs that would be created by the project represent less than 0.01 percent of the City's employment base and can be easily filled by the unemployed labor force of the City. It would also represent only 0.04 percent of SCAG's projected employment growth for the City from 2016 to 2045 (287,600 jobs). This would not be considered unplanned population growth nor would it exceed SCAG's demographic projections.

With the project proposing redevelopment of the site with the same industrial land use, the EBMF may encourage redevelopment of the vacant parcel at the eastern end of East 111th Place (Lanzit Industrial Site). However, this industrial site has remained vacant for more than 25 years, and the project is not expected to be a major factor in its redevelopment nor influence the amount, timing, or location of growth in the surrounding area.

Less than significant impacts would occur and no mitigation is required.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Reference: L.A. CEQA Thresholds Guide (Sections J.1 and J.2); City of Los Angeles General Plan Housing Element; Community Impact Assessment (Parsons, 2022).

Comment: A significant impact may occur if the proposed project displaced substantial numbers of existing housing, necessitating the construction of replacement dwelling units elsewhere.

Less than significant impact. The project would involve the acquisition of two industrial parcels, but it would not require the involuntary displacement of businesses because the existing structures are currently under a temporary lease while the properties are in escrow until the City acquires the property. Existing tenants at the site have been informed of the City's planned acquisition and redevelopment of the property. Temporary construction easements (TCEs) may be required on adjacent parcels during construction of the perimeter wall, but no acquisition or displacement of adjacent residences or institutional uses would occur. Impacts related to displacement would be less than significant and no mitigation is required.

3.16 Public Services

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
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 public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.16.1 Regulatory Setting

This section describes existing laws and regulations related to public services that apply to the project.

3.16.1.1 Federal

Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act of 1970 sets forth the provisions to ensure safe and healthful working conditions for all workers. The federal Occupational Safety and Health Administration (OSHA) enforces the provisions of the Act. Subpart F, Fire Protection and Prevention, of Part 1926 of the Act include those regulations related to construction work and job site fire-related regulations. Examples of requirements for fire protection and prevention include requirements for maintaining fire suppression equipment specific on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

3.16.1.2 State

California Building Code and California Fire Code

The California Code of Regulations (CCR) Title 24 (California Building Code [CBC]) is the compilation of uniform building standards, including fire safety standards, for residential and commercial buildings throughout the state. Part 9 of the CBC is known as the California Fire Code (CFC) which establishes minimum fire safety requirements for new and existing buildings, facilities, storage, and processing. The CFC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies.

California Fire Service and Rescue Emergency Mutual Aid Plan

The Office of Emergency Services (OES) Fire and Rescue Branch is responsible for the development, implementation, and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan. The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, so fire and rescue resources can be mobilized, and operated in the event of natural or man-caused disasters. The Los Angeles Fire Department (LAFD) participates in the California Fire Service and Rescue Emergency Mutual Aid System and is in Region I with the fire and rescue organizations located within San Luis Obispo, Santa Barbara, Ventura, Los Angeles, and Orange counties. All Mutual Aid participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of the OES.

California Education Code

Public school facilities and services within the State of California are subject to the rules and regulations of the California Education Code, with the State Board of Education providing the oversight and policy-making responsibilities of the California Department of Education.

3.16.1.3 Local

City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element includes an Infrastructure and Public Services chapter, which sets goals, objectives, and policies for fire protection and emergency medical services (EMS) in the City. The objectives and policies call for every neighborhood to have the necessary level of fire protection service, EMS, and infrastructure. It also sets a standard for response distance from the fire station to the destination location at 1.5 miles, which is consistent with the specifications for response distances in the LAMC.

The Framework Element also states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Objective 9.13 and Policy 9.13.1 of the Infrastructure and Public Services Chapter require the monitoring and reporting of police statistics and population projections to evaluate existing and future police

protection needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel are available to meet such needs

City of Los Angeles General Plan Safety Element

The City's General Plan Safety Element recognizes that most jurisdictions rely on emergency personnel to respond to and handle emergencies. The Safety Element establishes specific policies and objectives that emphasize hazard mitigation, emergency response, and disaster recovery. It serves as a guide for the construction, maintenance, and operation of fire protection facilities in the City. It sets forth policies and standards for fire station distribution and location, fire suppression water flow (or "fire flow"), firefighting equipment access, emergency ambulance services, and fire prevention activities.

City of Los Angeles General Plan Public Facilities and Services Element

The City's General Plan Public Facilities and Services Element consists of the Cultural and Historical Monuments Plan; the City-Owned Power Transmission Rights-of-Way Development Plan for park development on lands underlying transmission rights-of-way; the Major Equestrian and Hiking Trails Plan for acquisition, construction, and maintenance of equestrian and hiking trails; the Public Libraries Plan for construction, maintenance, and operation of public library facilities; the Public Recreation Plan for development of public recreational facilities; and the Public Schools Plan for acquisition and development of public schools and related facilities.

City of Los Angeles Municipal Code

Chapter 5 of the LAMC addresses Public Safety and Protection. Article 2, Police and Special Officers, in Chapter 5 contains regulations governing administrative issues, such as requirements for police badges and uniforms. Article 7 contains the Fire Code for the City. The Fire Code contains regulations to safeguard life and property from fire, explosion, panic, or other hazardous conditions that may arise in the City. It also includes the requirements for Hazardous Materials Release Response Plans and Inventory Statements and the storage, management, and disposal of hazardous materials, such as chemical USTs/ASTs, asbestos-containing materials/asbestos-containing building material, and various other combustible and flammable materials.

Los Angeles Fire Department Strategic Plan 2018-2020

LAFD's Strategic Plan 2018-2020 (A Safer City 2.0) focuses on five overarching goals over a three-year planning period:

- Provide Exceptional Public Safety and Emergency Service
- Embrace a Healthy, Safe and Productive Work Environment
- Capitalize on Advanced Technology
- Enhance LAFD Sustainability and Community Resiliency
- Increase Opportunities for Personal Growth and Professional Development

3.16.2 Existing Environment

Fire Protection Services

Fire protection and emergency response in the project area are provided by the Los Angeles Fire Department. The nearest fire station serving the project site is Station 64, located at 10811 South Main Street (approximately 0.73-mile northwest of the site). In 2021, the average emergency medical service (EMS) operational response time for LAFD Station 64 is 7 minutes and 9 seconds while the average response for a structure fire is 4 minutes 51 seconds (LAFD 2021).

Police Protection Services

The City of Los Angeles Police Department (LAPD) is the local law enforcement agency responsible for providing police protection services in the City. The proposed EBMF is located within the LAPD South Bureau and would be served by the Southeast Community Police Station located at 145 W. 108th Street (approximately 0.81-mile northwest of the site). The Southeast Community Police Station serves the neighborhoods within an area of approximately 10 square miles and has over 350 sworn and civilian personnel.

School and other Public Services

LAUSD provides educational services to students in the City, several unincorporated sections of Los Angeles County, and all or parts of 31 smaller municipalities. It serves students in kindergarten through 12th grade in over 1,000 schools and over 200 independently-operated public charter schools. The project site is within the service areas of the following schools:

- 109th Street Elementary School (Grades K-5) - 10915 S McKinley Ave, Los Angeles, CA, 90059
- Samuel Gompers Middle School (Grades 6-8) - 234 E 112th St, Los Angeles, CA, 90061
- Thomas Riley High School (Grades 9-12) - 1524 E 103rd St, Los Angeles, CA, 90002

The Ánimo James B. Taylor Charter Middle School operates out of two classroom buildings at 810 – 820 and 840 East 111th Place, immediately east of the project site. The Kedren Health Community Center and Head Start Preschool provides primary care, behavioral health, early childhood education, community food distribution, and other community services at 710 East 111th Place, immediately west of the project site.

The City's Department of Recreation and Parks operates and manages 444 separate park sites throughout the City. There are no City parks or recreation centers within 0.5-mile of the site, although there are several nearby schools with playfields. The nearest parks are the Ted Watkins Memorial Park at 1335 E 103rd Street and the 109th Street Recreation Center at 1464 E 109th Street.

Several other community facilities and services are located near the project (0.5-mile), including private schools, hospitals, clinics, churches, and other public facilities (e.g., libraries, city and county offices, and post offices).

3.16.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

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

i) Fire protection?

Reference: L.A. CEQA Thresholds Guide (Section K.2); City of Los Angeles General Plan Safety Element; Southeast Los Angeles Community Plan; Community Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the project required the addition of a new fire station or the expansion, consolidation, or relocation of existing fire stations to maintain service.

Less than significant impact. The project would require fire protection services from LAFD, replacing the demand currently created by the existing buildings on the site. The project would be constructed in a developed area served by LAFD Fire Station 64.

The proposed project would be designed, constructed, and operated in accordance with all applicable fire codes set forth by the State Fire Marshall and Los Angeles Fire Department (SC-PS-1). Therefore, the proposed project would not create a fire hazard. Also, the nearest local fire responders would be notified, as appropriate, of the construction schedule to coordinate emergency response routing during construction work (SC-CC-1). In a review of the existing service area of the LAFD and Fire Station 64, to maintain the level of fire protection and emergency services, the LAFD may require additional fire personnel and equipment. However, given that there is an existing fire station in proximity to the project site, it is not anticipated that there would be a need to build a new or expand an existing fire station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for fire protection. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents, and call frequencies, LAFD can shift resources to meet local demands for fire protection and emergency services. The proposed project would neither create capacity or service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain

acceptable service ratios, response times or other performance objectives for fire protection. Impacts on fire protection services would be less than significant and no mitigation is required.

Standard Condition

The following standard condition shall be implemented to prevent the creation of fire hazards at the site and an increase in demand for fire protection services:

SC-PS-1: The project shall be designed, constructed, and operated in accordance with the Los Angeles Fire Code and other applicable requirements in the Los Angeles Municipal Code (LAMC), Los Angeles Building Code (LABC), and other State and City regulations to prevent the creation of fire hazards, to reduce the potential for property damage and personal injury in the event of a fire, and to facilitate evacuation and emergency response.

Impacts on fire protection services would be less than significant, which would be ensured by compliance with SC-PS-1. No mitigation is required,

ii) Police protection?

Reference: L.A. CEQA Thresholds Guide (Section K.1); City of Los Angeles General Plan Safety Element; Southeast Los Angeles Community Plan; Community Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the proposed project resulted in an increase in demand for police services that would exceed the capacity of the police department responsible for serving the site.

Less than significant impact. The project site is served by the LAPD's Southeast Community Police Station. The proposed project would not result in an increase in population or create new demand for police services. Rather, existing industrial activities at the site will be replaced with a different type of industrial activity. In addition, the project site would be surrounded by walls and fences; the driveways would be gated; and security cameras and security guards would be provided. Therefore, to maintain the level of police services, the LAPD may require additional personnel and equipment. However, given that the site is adequately served by an existing station, and the project would not result in a significant increase in population or jobs, it is not anticipated that there would be a need to build a new or expand an existing police station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for police protection. The Southeast Community Police Station would be notified, as appropriate, of the construction schedule to coordinate emergency response routing during construction work (SC-CC-1). Impacts on police protection services would be less than significant and no mitigation is required.

iii) Schools?

Reference: L.A. CEQA Thresholds Guide (Section K.3); LAUSD Local District Map; Community Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the proposed project included substantial employment or population growth that would generate demand for school facilities that exceeded the capacity of the school district responsible for serving the project site.

No impact. The proposed project does not include the development of any residential uses and would not increase the residential population. No direct population growth would occur with the implementation of the project and no new students would be added to the existing school populations. Therefore, there would not be an increase in demand for school services from local LAUSD schools. No impact to schools would occur and no mitigation is required.

iv) Parks?

Reference: L.A. CEQA Thresholds Guide (Section K.4.), City of Los Angeles General Plan Open Space Element; Southeast Los Angeles Community Plan; Community Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the recreation and park services available could not accommodate the population increase resulting from the implementation of the project and new or physically altered facilities were needed.

No impact. The proposed project does not include the development of any residential uses and would not generate any new permanent residents that would increase the demand for local and regional park facilities. No impact to park and recreational facilities would occur and no mitigation is required.

v) Other public facilities?

Reference: L.A. CEQA Thresholds Guide (Section K.5); City of Los Angeles General Plan; Southeast Los Angeles Community Plan; Community Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the project resulted in the need for new or altered public facilities, such as libraries, due to population or housing growth.

No impact. The proposed project would improve the City's transit services and would be a public facility for use by LADOT buses. Construction and operation of the proposed project would not induce growth, either directly or indirectly, and, therefore, would not increase the demand for or use of libraries and other public facilities in the area. Therefore, no impact to other public facilities would occur. No mitigation is required.

3.17 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.17.1 Regulatory Setting

This section describes existing laws and regulations related to recreation that apply to the project.

3.17.1.1 Federal

There are no federal regulations that specifically address impacts related to recreation and apply to the project.

3.17.1.2 State

There are no State regulations that specifically address impacts related to recreation and apply to the project.

3.17.1.3 Local

City of Los Angeles General Plan Open Space Element

The City's General Plan Open Space Element serves as a guide for the identification, preservation, conservation, and acquisition of open space in the City. It sets goals, objectives, policies, standards, and criteria for publicly owned and privately owned open spaces and recreational uses.

City of Los Angeles General Plan Public Facilities and Services Element

The City's General Plan Public Facilities and Services Element includes the Major Equestrian and Hiking Trails Plan for the acquisition, construction, and maintenance of equestrian and hiking trails in the City and the Public Recreation Plan, which calls for the development of public recreational facilities. The Public Recreation Plan also includes service standards and goals for the provision of recreational facilities and operations.

Los Angeles Municipal Code

Section 19.17 of the LAMC sets a park fee for subdivisions in accordance with the Quimby Act, as well as park mitigation fees for non-subdivisions. Fees collected are then used for the development of new parkland to serve the developments.

3.17.2 Existing Environment

The project site does not accommodate or provide recreational facilities. The nearest park is the Ted Watkins Memorial Park (1335 E 103rd Street) and 109th Street Recreation Center (1464 E 109th Street).

3.17.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.4); City of Los Angeles Open Space Element and Public Facilities and Services Element; Los Angeles Department of Recreation and Parks; Community Impact Assessment (Parsons, 2022).

Comment: Based on the L.A. CEQA Thresholds Guide (Section K.4), the determination of whether a project results in a significant impact on recreation and parks will be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

No impact. No direct or indirect use of nearby parks and recreational facilities is anticipated with the project because nearby parks are not going to be affected by the construction and operations of the project. Also, the BEBs would not pass the Ted Watkins Memorial Park or 109th Street Recreation Center when going to and from the EBMF. In addition, employees who will be working at the EBMF are not expected to relocate to live within the project vicinity; therefore, they would not create a demand for parks and recreational facilities near the project. No impacts on existing parks and recreational facilities would occur and no mitigation is required.

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?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.4); City of Los Angeles Open Space Element and Public Facilities and Services Element; Community Impact Assessment (Parsons, 2022).

Comment: A significant impact may occur if the proposed project would require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

No impact. The project does not propose the construction of recreational facilities or the expansion of existing recreational facilities. No impacts related to the construction of recreational facilities would occur and no mitigation is required.

3.18 Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Transportation/Traffic Impact Assessment (Parsons, 2022) was prepared for the project and is provided in Appendix J. To assess the traffic impacts, the construction and operation traffic trip generation arising from the project were qualitatively and quantitatively evaluated. In determining the level of significance, the assessment assumed that the construction and operational activities of the project would comply with relevant City regulations, ordinances, and guidance. The findings of the assessment are summarized below.

3.18.1 Regulatory Setting

This section describes existing laws and regulations related to transportation that apply to the project.

3.18.1.1 Federal

Americans with Disabilities Act of 1990

Titles I, II, III, and V of the ADA have been codified in Title 42 of the United States Code. Title III prohibits discrimination on the basis of disability in “places of public accommodation” (businesses and nonprofit agencies that serve the public) and “commercial facilities” (other businesses). The regulations promulgated to implement ADA include *Appendix A to Part 36 (Standards for Accessible Design)*, establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travelway, and a vibration-free zone for pedestrians.

3.18.1.2 State

Senate Bill 743

SB 743 streamlines the review of traffic impacts under CEQA for development projects, including infill projects in transit priority areas to promote active transportation and the reduction of GHG emissions. It adds Chapter 2.7: Modernization of Transportation Analysis for Transit Oriented Infill Projects to the CEQA Statute (Section 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. In addition, SB 743 mandates that alternative metric(s) for determining impacts relative to transportation shall be developed to replace the use of Level of Service (LOS) in CEQA documents. Under SB 743, the focus of transportation analysis changes from vehicle delay to VMT.

VMT Guidelines

Updates to the State CEQA Guidelines establish VMT as the primary metric for evaluating a project's impacts on the environment and transportation system. The revised guidelines require that a project's environmental assessment must assess and disclose whether it conflicts or is inconsistent with local plans or policies. The revised guidelines also state, among other things, that "transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less-than-significant transportation impact."

OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* provides recommendations regarding significance thresholds for development projects with common land use types, general plans, and transportation projects. It lists more than two dozen types of transportation projects that would most likely not lead to a substantial or measurable increase in vehicle travel and therefore should not require an induced travel analysis. Among them are "rehabilitation, maintenance, replacement, safety and repair projects designed to improve the condition of existing transportation assets ([...] pedestrian facilities) and that do not add additional motor vehicle capacity."

3.18.1.3 Regional

SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG's RTP/SCS is a long-range visioning plan that balances future mobility and transportation needs with economic, environmental, and public health goals. The RTP/SCS consists of a vision for the region's future and is developed with input from local governments, County Transportation Commissions (CTCs), tribal governments, non-profit organizations, businesses, and local stakeholders within the region.

There are more than 4,000 transportation projects from local plans identified in the 2020–2045 RTP/SCS, including highway improvements, railroad grade separations, bicycle lanes, new transit hubs, replacement bridges, and pedestrian improvements.

These future investments would reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone.

Los Angeles County Congestion Management Program

The Los Angeles County Congestion Management Program (CMP) is a coordinated approach to managing and decreasing traffic congestion by linking the various transportation, land use, and air quality planning programs throughout the County. The 2010 CMP for Los Angeles County links local land use decisions with their impacts on regional transportation. The CMP identifies a system of highways and roadways and establishes a minimum LOS performance measurements of LOS E (except where the 1992 base year LOS is worse than E, in which case base year LOS is the standard) for highway segments and key roadway intersections on this system. A traffic impact analysis (TIA) is required for projects that generate at least 50 new trips at CMP monitoring intersections or 150 one-way trips on mainline freeway monitoring locations during either the AM or PM peak hour on weekdays.

3.18.1.4 Local

City of Los Angeles General Plan Mobility Element (Mobility Plan 2035)

The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users. The Mobility Plan 2035 incorporates "complete streets" principles and lays the policy foundation for how future generations of residents interact with their streets. The Mobility Plan also contains policies that pertain to maintaining safe and attractive sidewalks.

Southeast Los Angeles Community Plan

The Southeast Los Angeles Community Plan serves as the Land Use Element of the City's General Plan and articulates the vision for long-term physical and economic development and community enhancement of the Southeast Los Angeles community. This Community Plan includes goals and policies addressing land use and urban design, mobility, community facilities, and infrastructure issues in the community. It designates the project site as Limited Industrial with a Manufacturing zone and classifies East 111th Place as a Collector Street.

Los Angeles Municipal Code

LAMC Section 12.21.A,4. contains requirements related to vehicle parking spaces by development type. Section 12.21.A,16 contains requirements related to bicycle parking spaces. LAMC Section 12.37 contains requirements related to highway and collector street dedication and improvement. LAMC Section 17.05 contains standards that expand the role of the Street Standards Committee and reflect the City's new focus on complete streets. LAMC Section 62.61 states that temporary lane closures resulting from non-emergency construction along major and secondary highways or collector streets would be limited to off-peak hours. Permits may be issued on a case-by-case basis to provide exemption. Section 62.105 outlines City requirements for streets, sidewalks, driveways, and other improvements.

3.18.2 Existing Environment

Regional Access

The City has a freeway network that includes Interstates, United States Highways, and State Routes (SR). The nearest State highway is I-105, located approximately 0.4-mile (about seven blocks) south of the site.

Local Roadway Network

The City has approximately 7,500 miles of public streets that accommodate a variety of motorized and non-motorized vehicles, including private motor vehicles, taxis, freight vehicles, transit vehicles, and bicycles. The project site is located on the south side of East 111th Place, which is classified as a Collector Street in the Mobility Plan 2035.

Public Transit Services

The City is served by multiple transit operators, with the Los Angeles County Metropolitan Transportation Authority (Metro) as the primary transit operator within the City. Metro operates local bus, rapid bus, busway service, light rail, and heavy rail throughout the County and surrounding areas. Local jurisdictions, including the City of Los Angeles, operate additional transit services. LADOT operates local DASH service as well as Commuter Express bus routes. Several other municipal bus operators provide additional transit services connecting the City to neighboring jurisdictions and counties. LADOT operates and maintains some of its existing DASH and Commuter Express bus fleet at the South Yard, located approximately 2 miles south of the project site. The South Yard facility currently operates approximately 95 buses: 3 propane and 42 CNG DASH buses and 50 CNG Commuter Express buses.

Traffic Volumes

The COVID-19 pandemic has abnormally impacted statewide traffic patterns, such that current field traffic counts have decreased significantly as compared to pre-pandemic conditions. To ensure the credibility of baseline traffic conditions, on which future year conditions (post-COVID-19) are based, the traffic count data collected by LADOT in June 2021 was compared to the year 2019 traffic count data of StreetLight Data. Since the 2019 traffic count data of StreetLight Data was considerably higher than the recent LADOT traffic count, the year 2019 traffic count data of StreetLight Data has been used for the traffic operational analysis. Table 3.18-1 presents the existing condition intersection LOS summary at the South Avalon Boulevard and East 111th Place intersection.

Table 3.18-1: Existing Intersection LOS Summary

Intersection No.	Intersection Location	Control	Existing Conditions			
			<i>AM Peak Hour</i>		<i>PM Peak Hour</i>	
			Delay	LOS	Delay	LOS
1	S. Avalon Blvd & E. 111th Pl	Signal	72.3	E	28.3	C

Parking

On-street parking is generally allowed on Local and Collector streets in the study area, including East 111th Place and the west side of Avalon Boulevard. Off-street surface parking is available at individual lots. On East 111th Place in the study area, no parking is allowed on the south side of the street from 2:00 a.m. to 6:00 a.m. and vehicles over 7-feet tall and 22-feet long are prohibited. Additionally, no parking is allowed on Tuesdays from 9:30 a.m. to 11:30 a.m. for street cleaning.

3.18.3 Impact Analysis

3.18.3.1 Methodology

Traffic analysis for the proposed project was performed in consultation with LADOT. Per the request of LADOT, both VMT and LOS analyses were performed to analyze the potential project impacts as outlined in the Memorandum of Understanding, which was approved by LADOT on September 1, 2021.

Vehicle Miles Traveled (VMT)

The City of Los Angeles Vehicle Miles Traveled Calculator (VMT Calculator) was used to review the project's vehicle trips and vehicle miles traveled (VMT). As with the land use type of the proposed project, light industrial was selected for the existing land use based on discussions with LADOT. The thresholds of further VMT analysis are 250 daily trips and 1,000 daily VMT. If the proposed facility would generate an increase of less than 250 daily trips and less than 1,000 daily VMT, further VMT analysis is not required.

Intersection Level of Service Analysis

The LOS analysis for the proposed project was performed consistent with the City of Los Angeles Transportation Impact Study Guidelines. The methodology used to assess the operation of signalized intersections in the City of Los Angeles is the Highway Capacity Manual (HCM 2010) delay-based methodology. Under HCM 2010 methodology, LOS thresholds are based on the average delay incurred by vehicles traveling through an intersection. Delay is dependent on a number of factors, including signal cycle length, roadway capacity (number of travel lanes) provided on each intersection approach, and traffic demand.

The LOS analysis is used to evaluate congestion and delay on streets and highways. The relative level of congestion is evaluated on a scale of A through F. Level of service A indicates free-flow conditions with no delay. LOS F indicates the breakdown of the system with very long vehicular delays. The relationship between the LOS and delay for signalized intersections is shown in Table 3.18-2.

Table 3.18-2 Level of Service For Signalized Intersections

Level of Service	Signalized Intersection Control Delay (Seconds)
A	0-10
B	10-20
C	20-35
D	35-55
E	55-80
F	80 or more

Source: Highway Capacity Manual (2010)

The computer software program Synchro (version 9) was used to calculate the intersection delay and resulting LOS. Synchro is a traffic signal progression analysis software tool that is capable of performing intersection delay analyses using various methodologies, including the HCM 2010 method.

Model input, calculation methods, and model output are presented in the TIA prepared for this project (see Appendix J).

3.18.3.2 Responses to CEQA Checklist

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle and pedestrian facilities?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections L.1 through L.4 and L.6 through L.8); LADOT Transportation Assessment Guidelines; Los Angeles County Congestion Management Program; City of Los Angeles General Plan; Mobility Plan 2035; Transportation/Traffic Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the proposed project conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Less than significant impact with mitigation incorporated. The proposed project would not conflict with the Los Angeles General Plan, including the Southeast Los Angeles Community Plan, Mobility Plan 2035, and the 2010 Bicycle Plan. Project construction and operation would generate vehicle trips on local roads in the project area.

Construction Trip Generation

Construction activities associated with the project would occur mainly within the project site during the two-year construction period. Traffic flow along the roadway alignment would be maintained during construction, although, occasionally, lane

reduction could occur to accommodate construction activities on the adjacent sidewalk and site frontage on 111th Place. The Contractor shall prepare a TMP before construction. The TMP will outline necessary street lane closures and detours. A restriction on large-size trucks shall be imposed to confine travel to and from the construction site during off-peak commute times. Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible. The TMP will be submitted with the construction plans to the Los Angeles Police and Fire departments before the commencement of construction activities (SC-CC-1).

During temporary blockages of sidewalks, a sidewalk detour that would reroute pedestrians to an alternative sidewalk path or a sidewalk diversion, which provides a protected pathway near, but safely away from the station construction, would be included in the TMP, and implemented in accordance with the California MUTCD or other City-approved standard. Signs will be posted to direct pedestrians to intersections where they may cross.

Business access would be maintained at all times during construction, and work would be scheduled to avoid unnecessary inconvenience to the public and abutting property owners (SC-CC-2). Undue delays in construction activities would be avoided to reduce the public's exposure to construction.

As such, significant traffic impacts during construction would not occur, which would be ensured by the implementation of SC-CC-1 through SC-CC-2.

Operations Trip Generation

The project would generate vehicle trips that would replace those currently generated by the logistics warehouse operating at the site. Most of the buses from the EBMF would roll out in the early morning hours, before AM peak hour traffic. In addition, many other staffs and workers would work a very early shift, arriving before the AM peak hour (7 AM) and leaving before the PM peak hour (5 PM). Mechanics and attendants would rotate in three shifts, early morning, swing shift, nights, as shown in Table 2-23. Therefore, the new vehicle trips generated at the EBMF would be limited to approximately 20 trips each for AM peak hour and PM peak hour. The proposed project would generate an increase of less than 500 daily trips and less than 43 PM peak hour vehicle trips on the street system.

Table 3.18-3 presents the existing and projected intersection Level of Service (LOS) at the S. Avalon Boulevard and East 111th Place intersection.

Table 3.18-3: No-Build and Build Intersection LOS Summary

Intersection No.	Intersection Location	Control	No-Build Conditions				Build Conditions			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1	S. Avalon Blvd & E. 111 th Pl	Signal	75.7	E	29.1	C	77.7	E	30.5	C

Under existing conditions, the intersection LOS is already at LOS E during the AM peak hour, and the westbound movement is failing. The project would not change the LOS but the delay would increase by 2 seconds during the AM peak hour and by 1.4 seconds during the PM peak hour. Per City TIA guidelines, this is considered a minor increase in delay since no change in LOS would occur. The impact of the proposed project would be less than significant, but the intersection LOS at South Avalon Blvd. and East 111th Place in the existing and No-Build condition is LOS E and the westbound left-turn movement has a volume-to-capacity ratio (v/c) of greater than 1.0. The performance of the nearby intersections will be quantified after the project is fully constructed and operational. If it is determined that the project exceeds screen criteria as defined in the LADOT Transportation Assessment Guidelines (TAG), potential corrective action could be implemented including, for the westbound approach, providing an additional left-turn lane pocket is recommended to improve the intersection delay and LOS, or improving the East 111th Place to two lanes in each direction from the eastern end of the site frontage to Avalon Boulevard would provide additional roadway capacity. This is outlined below in the project design feature, PDF-TR-1, and would reduce transportation impacts to less than significant levels.

Project Design Feature

The following project design feature would be incorporated into the project:

PDF-TR-1: The proposed project shall quantify the operational performance for primary site access points, unsignalized intersections integral to the project's site access, and signalized intersections in the vicinity of the project site after the project is fully operational. If it is determined that the project exceeds the travel volume screening criteria for Boulevards and Avenues as defined in the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG), further analysis is required to estimate the travel delay at each major signalized intersection where the capacity would be altered by the projects and to estimate how the project would be expected to improve safety or reduce hazards to vulnerable road users. Potential corrective actions for the project access and circulation constraints could include:

- Provide an additional left-turn lane pocket for the westbound approach at the S. Avalon Blvd. and E. 111th Place intersection.

- Improving the segment of E. 111th Place from the eastern end of the site frontage to Avalon Boulevard to two lanes each direction to provide additional roadway capacity.
- Transportation Demand Management (TDM) Strategies that reduce trips above and beyond those required in Section 2.2 of the LADOT TAG.
- Installation of a traffic signal or stop signs or electronic warning devices at site access points.
- Redesign and/or relocation of project access points.
- Redesign of the internal access and circulation system.
- Installation of stop signs and pavement markings internal to the site.
- Restrict or prohibit turns at site access points.
- Repurpose existing curb space to better accommodate passenger loading.
- New traffic signal installation, left-turn signal phasing, or other vehicle flow enhancements (e.g., Automated Traffic Surveillance and Control [ATSAC] system upgrades) at nearby intersections.
- Intersection reconfiguration that reduces gridlock and unsafe conflict points.
- Provide continuous paved sidewalks, walkways, or shared-use paths to off-site pedestrians and bicyclists to adjacent or nearby transit facilities.
- Fair share contribution to planned LADOT capital project that accomplishes one or more of the above.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Reference: L.A. CEQA Thresholds Guide (2006) (Section L); LADOT Transportation Assessment Guidelines; Transportation/Traffic Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the project generates a net increase of 250 or more daily vehicle trips or generates a net increase of 1,000 VMT or more per site over existing conditions in daily VMT. A significant impact would occur if the project includes retail uses and the portion of the project that contains retail uses exceeds net 50,000 square feet; and if located within 0.5-mile of a fixed-rail or fixed-guideway transit station, replaces an existing number of residential units with a smaller number of residential units.

Less than significant impact. To assess traffic impacts of the proposed facility in VMT, the City of Los Angeles VMT Calculator was used. Regionally, the Compton Facility would be considered as the existing facility since it is located only 2 miles south of the proposed facility. Based on the discussion with LADOT, the Light Industrial category was used for the existing Land Use of the project site to determine the net increase in daily trips and the net increase in daily VMT. Using this input, the proposed project would generate a net increase of 90 trips and a net increase of 724

VMT. Since the proposed facility would generate an increase of less than 250 daily trips and less than 1,000 daily VMT over existing conditions, the proposed project is not required to perform further VMT analysis. The proposed project would not conflict with State CEQA Guidelines Section 15064.3, subdivision (b) during construction and maintenance/operations. The impact of the proposed project would be less than significant, and no mitigation is required.

The project site is within a Transit Priority Area (TPA) with bus lines along several roadways in proximity to the site (108th Street, S. Avalon Boulevard, S. Central Avenue, and Imperial Highway). The project site is within 1,500 feet of several major transit stops (intersections with two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods) as defined under PRC Section 21064.3. The State Office of Planning and Research issued guidance with respect to how to evaluate transportation impacts. As stated in the CEQA Guidelines Section 15064.3 (b)(1), lead agencies generally should presume that projects proposed within 0.5-mile (2,640 feet) of an existing major transit stop or an existing stop along a high-quality transit corridor should be presumed to cause a less than significant impact on transportation. Therefore, with the project's location near an existing stop along a high-quality transit corridor, the proposed project would not be considered to have a significant impact on transportation.

The impact of the project would be less than significant and no mitigation is required.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Reference: L.A. CEQA Thresholds Guide (Section L.5); LADOT Transportation Assessment Guidelines; Transportation/Traffic Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the project proposes new driveways, introduces new vehicle access to the property from the public right-of-way, or proposes to, or is required to, make any voluntary or required modifications to the public right-of-way (e.g., street dedications, reconfigurations of curb line).

Less than significant impact. The proposed project would improve the existing driveways for entry and exit and introduce new vehicle access to the property from the public right-of-way. The proposed project shall be designed in accordance with City standards and would not substantially create or increase hazards due to design features. The impact of the proposed project would be less than significant with the implementation of SC-TR-1, requiring compliance with City standards for streets, sidewalks, driveways, and other street improvements, as outlined in the LAMC.

Standard Conditions

The project shall implement the following standard condition to avoid the creation of traffic hazards:

SC-TR-1: The proposed project shall be designed in accordance with City of Los Angeles standards for streets, sidewalks, driveways, and other street improvements to prevent the creation of traffic hazards.

The impact of the project would be less than significant, which would be ensured by compliance with SC-TR-1 and no mitigation is required.

d) Would the project result in inadequate emergency access?

Reference: L.A. CEQA Thresholds Guide (Sections L.5 and L.8); LADOT Transportation Assessment Guidelines; Transportation/Traffic Impact Assessment (Parsons, 2022).

Comment: A significant impact would occur if the project resulted in inadequate emergency access.

Less than significant impact. Based on the conceptual design of the proposed facility, three driveways would be constructed on East 111th Place, which would also serve as emergency access. The northwestern driveway would serve arriving buses, the northeastern driveway would serve departing buses, and the center driveway would serve employee and visitor vehicles. Emergency access would not be substantially inhibited by the proposed project, with compliance with the City's Fire Code (SC-PS-1). The impact of the proposed project would be less than significant, and no mitigation is required.

3.19 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
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 Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An Archaeological Resources Assessment was prepared for the project and is provided in Appendix C1. The assessment included an analysis of potential impacts to Tribal Cultural Resources (TCR). The findings of the memo are summarized below.

3.19.1 Regulatory Setting

This section describes existing laws and regulations related to TCR that apply to the project.

3.19.1.1 Federal

There are no federal regulations that specifically address impacts related to TCR and apply to the project.

3.19.1.2 State

California State Assembly Bill (AB) 52

AB 52 defines TCRs and requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a project if they have

requested to be notified of projects subject to AB 52. Consultation, as defined under AB 52 includes, but is not limited to, discussing the type of environmental review necessary, the significance of TCRs, the significance of project impacts on the TCRs, and alternatives and mitigation measures recommended by the tribe. Parties must consult in good faith and consultation is deemed concluded when (1) the parties agree to the measures to avoid or reduce a significant impact on a TCR (if such a significant impact exists) or (2) when a party concludes that mutual agreement cannot be reached. Further, under AB 52, mitigation measures agreed upon during consultation must be included in the environmental document and, if no formal agreement on the appropriate mitigation has been established, mitigation measures that avoid or substantially lessen potential significant impacts should be implemented.

California Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (California Health and Safety Code Division 7, Part 2, Chapter 5, Sections 8010–8030) includes broad provisions for the protection of Native American cultural resources. The Act ensures that all California Native American human remains and cultural items are treated with due respect and dignity. It provides the mechanism for the disclosure and return of human remains and cultural items held by publicly funded agencies and museums in California.

3.19.1.3 Local

City of Los Angeles General Plan Conservation Element

The City's General Plan Conservation Element includes goals, objectives, and policies requiring measures be taken to protect the City's historical, archaeological and paleontological resources for historical, cultural, research, and/or educational purposes. One policy requires that the City continue to identify and protect significant archaeological and paleontological sites and resources known to exist or that are identified during land development, demolition, or property modification activities.

City of Los Angeles Historic-Monument Ordinance

On the local level, a historical or cultural monument is eligible for listing as a Los Angeles Historic-Cultural Monument (HCM) under Section 22.171 of Article 1, Division 22 of the City of Los Angeles *Administrative Code* (the City of Los Angeles Cultural Heritage Ordinance, as amended by Ordinance No, 185472) if the resource meets specific criteria.

The City further maintains a list of all sites, buildings, and structures that have been designated through the Historic-Cultural Monuments (HCMs), which since the enactment of the ordinance, now number more than 1,000. An HCM is presumed to be a significant historical resource under CEQA, that could lead to the preparation of an EIR before demolition can occur.

3.19.2 Existing Environment

The project site is located in the traditional native lands of the Gabrielino of the Shoshonean language stock. This area covered the Los Angeles Basin, the San Gabriel Valley, the Santa Monica and Santa Ana mountains, the coast from Aliso Creek to Topanga Creek, and the islands of San Clemente, San Nicholas, and Santa Catalina. The Los Angeles Basin was known to include many major Gabrielino villages with a total population estimated at over 10,000 individuals at the time of the Spanish arrival in 1769.

A request was made of the Native American Heritage Commission (NAHC) for a review of their Sacred Lands File (SLF) and a list of Native American contacts on May 5, 2021, and a reply was received on May 20, 2021. The NAHC check of the SLF was negative for the project site. NAHC recommended that any additional information concerning sacred lands should be sought from the Native American contacts and provided the following tribal contacts:

- Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians - Kizh Nation
- Anthony Morales, Chairperson, Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Sandonne Goad, Chairperson, Gabrieliño/Tongva Nation
- Robert Dorame, Chairperson, Gabrieliño Tongva Indians of California Tribal Council
- Charles Alvarez, Gabrieliño-Tongva Tribe
- Lovina Redner, Tribal Chair, Santa Rosa Band of Cahuilla Indians
- Isaiah Vivanco, Chairperson, Soboba Band of Luiseno Indians

Letters inviting these tribes to consult under AB 52 were mailed on June 8, 2021, via United States Post Office mail and by email by the Los Angeles Bureau of Engineering (LABOE) to the Native American contacts identified by the NAHC. The Gabrielino Band of Mission Indians - Kizh Nation responded and requested consultation and this consultation was concluded on August 16, 2022.

3.19.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined Public Resources Code section 5020.1(k)?

Reference: L.A. CEQA Thresholds Guide (2006) (Section D.2); City of Los Angeles General Plan; Southeast Los Angeles Community Plan; AB 52 Consultations; HCM List; CRHR; Archaeological Resources Assessment (Parsons, 2022).

Comment: A significant impact would occur if the proposed project caused a substantial adverse change in the significance of a Tribal Cultural Resource that is listed or is eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC section 5020.1(k).

Less than significant impact with mitigation incorporated. TCRs were identified through the review of the NAHC's SLF and consultation carried out under the auspices of AB 52. While there are no TCRs currently listed on the CRHR, the City's HCM List includes a Gabrieleño Indian site near Griffith Park (HCM #112) and the Gabrieleño village of Sa'angna near the Ballona wetlands (HCM #490). The project site is not located near these HCMs. However, there is the possibility that ground-disturbing activities could impact native soils containing previously undiscovered buried TCR. MM-TCR-1 shall be implemented to avoid impacts to TCRs. Impacts would be less than significant after mitigation.

b) 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 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?

Reference: L.A. CEQA Thresholds Guide (2006) (Section D.2); City of Los Angeles General Plan; Southeast Los Angeles Community Plan; HCM List; AB 52 Consultations; Archaeological Resources Assessment (Parsons, 2022).

Comment: A significant impact would occur if the proposed project caused a substantial adverse change in the significance of a tribal cultural resource which is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.

Less than significant impact with mitigation incorporated. In compliance with the mandates of AB 52 and Section 21080.31 of CEQA, notification letters were sent by the City to tribes and Native American organizations whose names were on file with the NAHC and the City, informing them about the project and providing an opportunity to consult about the project. One tribe requested consultation, and the City initiated consultation. On August 16, 2022, consultation was concluded.

As stated above, there is the possibility that ground-disturbing activities that extend below a depth of 3 feet in native soil could impact previously undiscovered buried TCRs. Disturbance of undocumented TCRs would be ensured to be less than significant with the implementation of MM-TCR-1. Impacts would be less than significant after mitigation.

3.19.4 Mitigation Measure

The following mitigation measure shall be implemented to avoid impacts on TCRs:

MM-TCR-1: Due to the potential for tribal cultural resources to exist on the project site, prior to the commencement of any ground-disturbing activity at the project site, the City of Los Angeles (the City) shall retain a tribal monitor that is qualified to identify, record, and evaluate the significance of any archaeological and/or tribal cultural finds during construction. The qualified tribal monitor shall be from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (the Tribe). Ground-disturbing activities shall include removing pavement, potholing, auguring, grubbing, removing trees, boring, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or similar activity at the project site. The executed monitoring service agreement shall be submitted by the qualified tribal monitor to the City prior to any ground-disturbing activity. The qualified tribal monitor will complete logs describing each day's construction activities, locations, soil, and any cultural materials, human remains, and/or burial goods discovered. Tribal monitoring shall conclude when ground-disturbing activities on the project site have been completed, or when the qualified tribal monitor indicates any additional construction activity at the project site has little or no potential to impact tribal cultural resources. In accordance with PDF-CUL-1, prior to commencing any ground disturbing activities, the qualified archaeologist and the qualified tribal monitor shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground-disturbing activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground-disturbing activities. In addition, workers will be shown examples of the types of resources that would require notification to the archaeological monitor and tribal monitor.

Upon discovery of any subsurface object or artifact that may be a tribal cultural resource during the course of any ground-disturbing activity, procedures to ensure that tribal cultural resources are not damaged include but are not limited to the following steps:

- All such ground-disturbing activities shall cease in the immediate vicinity of the discovery, the radius of which will be determined by the qualified tribal monitor or the qualified archaeological monitor, until the qualified tribal monitor has evaluated the find in accordance with federal, state, and local guidelines.
- The found deposits shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribe and the tribal monitor, and in accordance with federal, state, and local guidelines.
- Personnel of the project shall not collect or move any archaeological or tribal resources or associated materials or publish the location of tribal cultural resources.
- If the resources are Native American in origin, the tribal monitor will make recommendations to the City regarding the monitoring of future ground-disturbing activities, as well as the treatment and disposition of any discovered tribal cultural resources, which may include but not limited to the preservation in place or recovery and retention of them in the form and/or manner which the tribal monitor and the Tribe deem appropriate for educational, cultural, and/or historic purposes. Until a recommendation is made, the discovery should be preserved in place or left in an undisturbed state. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource and this determination is documented by a qualified archaeologist or tribal monitor.
- The City shall implement the tribal monitor and Tribe's recommendations if the City can reasonably conclude that the recommendations are reasonable and feasible to mitigate or avoid any significant impacts to the identified tribal cultural resources. If the City does not accept a particular recommendation determined to be reasonable and feasible by the qualified tribal monitor, the City may request mediation by a mediator agreed to by the tribal monitor, the Tribe, and the City who has the requisite professional qualifications and experience to mediate such a dispute. The City shall pay any costs associated with the mediation. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources.

- The ground-disturbing activities may recommence outside of a specified radius of the discovery site, so long as this radius has been cleared by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
- The location of the find of tribal cultural resources and the type and nature of the find will not be published beyond providing it to public agencies with jurisdiction or responsibilities related to the resources, the qualified archaeologist, qualified tribal monitor, and the Tribe.
- If the resources consist of non-Native American historic archaeological materials, a qualified archaeologist will apply National Register of Historic Places Criterion D to determine their significance. Artifacts will be curated per the Code of Federal Regulations 36 Part 79, as applicable, or be offered to a local historical society museum or educational facility, as deemed appropriate by the City.

SC-CUL-1 shall be implemented should human remains be inadvertently discovered at the project site. If the Gabrieleño Band of Mission Indians – Kizh Nation is designated Most Likely Descendant (MLD) by the Native American Heritage Commission (NAHC), the Koonas-gna Burial Policy shall be implemented. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be prepared by the MLD. Associated funerary objects reasonably believed to have been placed with individual human remains either at the time of death or later and made exclusively for burial purposes are to be treated with utmost respect and dignity. The prepared soil and cremation soils are to be treated in the same manner as intact bone fragments. Cremations will either be removed in bulk or by means necessary to ensure the complete recovery of all sacred materials.

In such cases where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate which can only be moved by heavy equipment. If this type of steel plate is unavailable, a 24-hour guard should be posted outside of working hours. The City will make every effort to divert project activities and keep the remains in situ and protected. If the project cannot be diverted, it may be determined that the burials will be removed. The MLD will work closely with the City's designated qualified archaeologist and tribal monitor to ensure that the excavation is treated carefully, ethically, and respectfully. Each occurrence of human remains and associated funerary objects, sacred objects, and objects of cultural patrimony will be retained and reburied within six months of recovery in a secure container. If preservation in place is not possible despite good faith efforts, a site located within the project parcel footprint, as agreed to by the City and the Tribe, and to be protected in perpetuity, shall be designated for the respectful reburial of

the human remains and/or ceremonial objects. There shall be no publicity regarding any cultural materials recovered.

Any data recovery plans shall require approval by the Tribe; such documentation will include detailed descriptive notes and sketches, at a minimum. Additional documentation as outlined in a treatment plan should also be approved by the Tribe. If additional data recovery is conducted, a final report will be submitted to the Tribe, Native American Heritage Commission, and South Central Coastal Information Center. No invasive and/or destructive diagnostics on human remains shall be conducted.

3.20 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.20.1 Regulatory Setting

This section describes existing laws and regulations related to utilities and service systems that apply to the project.

3.20.1.1 Federal

There are no federal regulations that specifically address impacts related to utilities and that apply to the project.

3.20.1.2 State

California Water Plan

The *California Water Plan* (CWP) presents information on California's water resources such as water supply evaluations and assessments of agricultural, urban, and environmental water uses to quantify the gap between water supplies and uses. The plan identifies and evaluates existing and proposed statewide demand management and water supply augmentation programs and projects to address the state's water needs. It includes resource management strategies and recommendations to strengthen integrated regional water management, including ways to reduce water demand, improve operational efficiency, increase water supply, improve water quality, practice resource stewardship, and improve flood management.

California Integrated Waste Management Act

The *California Integrated Waste Management Act* (AB 939) required each city and county in the State of California and regional solid waste management agencies to enact plans and implement programs to divert 25 percent of its waste stream by 1995 and 50 percent by 2000. Later legislation mandates the 50 percent diversion requirement be achieved every year. SB 1374 (amending PRC Sections 41821 and 41850 and adding to Section 4291) requires that the annual report mandated by the California Integrated Waste Management Act also include a summary of progress made in diversion of construction and demolition waste materials, including information on programs and ordinances implemented by the local government and quantitative data, where available.

3.20.1.3 Local

City of Los Angeles General Plan Conservation Element

The City's General Plan Conservation Element calls for the conservation, protection, development, utilization, and reclamation of natural resources, such as water, forests, soils, rivers, and other waters, harbors, fisheries, wildlife, minerals, and other natural resources.

City of Los Angeles General Plan Infrastructure Systems Element

The City's General Plan Infrastructure Systems Element addresses water supply and demand, measures related to energy conservation and reducing the City's reliance on oil, landfill capacity assessment, wastewater discharge into the ocean and other water bodies, protection of groundwater and watershed resources, solid waste management, as well as electrical and other City-managed resource areas.

City of Los Angeles General Plan Open Space Element

The City's General Plan Open Space Element provides guidance for the preservation, conservation, and acquisition of open space in the City, including lands needed for life support systems such as the water supply, water recharge, water quality protection, wastewater disposal, solid waste disposal, air quality protection, energy production, and noise prevention.

City of Los Angeles Water Integrated Resources Plan

Prepared jointly by the Los Angeles Bureau of Sanitation and Environment (LASAN) and LADWP, the Water Integrated Resources Plan (WIRP) contains an implementable facility plan through the year 2020 that integrates water supply, water conservation, water recycling, runoff management, and wastewater facilities planning, using a regional watershed approach. The WIRP contains recommendations that would be achieved through a series of projects and policy directions to staff.

City of Los Angeles Emergency Water Conservation Plan

The City's Emergency Water Conservation Plan sets standards for water use during an emergency. Ordinance No. 181288, an amendment to Chapter XII, Article I of LAMC, clarified prohibited uses and modified certain water conservation requirements in the Emergency Water Conservation Plan. The ordinance minimizes the effect of a water shortage on the customers of the City and includes provisions that will significantly reduce water consumption over an extended period of time. The Plan sets five water conservation "phases," which correspond to the severity of water shortage, with each increase in phase requiring more stringent conservation measures related to outdoor watering restrictions, sprinkler use restrictions and other prohibited water uses.

City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance

The Stormwater and Urban Runoff Pollution Control Ordinance (LAMC Section 64.70) prohibits illicit discharges into the municipal storm drain system and gave the City local legal authority to enforce the NPDES and to take corrective actions with serious offenders. Any commercial, industrial, or construction business found discharging waste or wastewater into the storm drain system would be subject to legal penalties.

Sewer System Management Plan

The SWRCB adopted the Statewide General Waste Discharge Requirements (WDRs) for publicly owned sanitary sewer systems. Under the WDRs, the owners of such systems must develop and implement a Sewer System Management Plan. The Sewer System Management Plans include objectives to properly fund, manage, operate, and maintain all parts of the sanitary sewer system; provide adequate capacity to convey base flows and peak flows; and take all feasible steps to stop and mitigate overflows.

Construction and Demolition Waste Recycling Ordinance

To meet AB 939 and SB 1374 mandates, the City adopted the Construction and Demolition Waste Recycling Ordinance (Ordinance 181519, which amended LAMC Sections 66.32 through 66.32.5). This ordinance requires that all solid waste haulers and contractors obtain a permit before transporting construction and demolition waste, and stipulates that such waste may only be processed at City-certified construction and demolition waste-processing facilities.

City of Los Angeles Solid Waste Integrated Resources Plan

The SWIRP, also known as the Zero Waste Master Plan, is a stakeholder-driven process and long-range master plan for solid waste management in the City. The SWIRP proposes to achieve a goal of 80 percent diversion by 2020 and 95 percent

diversion by 2035. These targeted diversion rates are expected to be achieved through an enhancement of existing policies and programs, implementation of new policies and programs, and the development of future facilities to meet the City's recycling and solid waste infrastructure needs over a 20-year planning period. According to the 2015 Zero Waste Master Plan Report, the City achieved a baseline diversion rate of 72 percent. The City reports a landfill diversion rate of 76.4 percent, using the calculation methodology adopted by the State of California.

LADWP Power Integrated Resources Plan

LADWP is responsible for the construction, operation, maintenance, and management of electric works and property for the benefit of the City and developed the 2015 Power Integrated Resource Plan (PIRP) as a comprehensive 20-year roadmap to guide its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner over the next 20 years. The PIRP provides objectives and recommendations to reliably supply LADWP customers with power and to meet SB 1078's 33 percent renewable energy goal by 2020. The 2015 PIRP increases the RPS to 50 percent by 2030.

Urban Water Management Plan

LADWP adopted the 2020 Urban Water Management Plan (UWMP) as required by the California Urban Water Management Act. The UWMP forecasts future water demands and water supplies under average and dry year conditions. It presents strategies that would be used to meet the City's current and future water needs, which focus primarily on water supply reliability and water use efficiency measures.

3.20.2 Existing Environment

Water Supply and Service

The project site is served by an LADWP water line on East 111th Place. The Los Angeles Aqueduct supplies approximately 48 percent of the City's water, imported water purchased from MWD accounts for 41 percent, local groundwater resources comprise 9 percent, with recycled water supplies accounting for 2 percent of the City's total water supply in Fiscal Years 2016-2020. Between 2016 and 2020, LADWP supplied an average of about 495,685 AF of water annually, where the average daily use for all customers in 2020 was 106 gallons per capita per day.

Sewers and Wastewater Treatment

The project site is served by an 8-inch sewer line on East 111th Place that runs northeasterly and then southerly to the sewer line on Lanzit Avenue that, in turn, ties to the Los Angeles County Sanitation District (LACSD) sewer line on Belhaven Street and Imperial Highway, which provides wastewater conveyance from the project area for treatment at the Joint Water Pollution Control Plant (JWPCP) in Carson.

The JWPCP is operated by the LACSD and provides primary and secondary treatment for a design capacity of 400 million gallons per day (mgd) of wastewater, and serves over 4.8 million residents, businesses, and industries. It currently treats 260 mgd.

Stormwater

The City's storm drain system includes streets, driveways, sidewalks, and structures that directly convey runoff to curb and gutter systems, catch basins, culverts, underground storm drain lines, detention/retention basins, and downstream receiving waters (e.g., creeks and rivers). The area-wide storm drainage system is owned and managed by the Los Angeles County Flood Control District (LACFCD). There is an underground storm drain line on East 111th Place that connects to Compton Creek, east of the site.

Solid Waste Disposal

While LASAN is responsible for the collection and removal of solid materials and wastes from single-family homes and small multi-family complexes, medium and large multi-family complexes and commercial businesses are served by permitted private haulers (i.e., Athens, CalMet, NASA, Republic, Universal Waste System, Ware, and Waste Management) and by construction and demolition waste processors.

There are several Class III solid waste disposal facilities (landfills accepting municipal and other non-hazardous, household waste) in Los Angeles County. Hazardous wastes are disposed of at designated Class I facilities (i.e., landfills accepting hazardous and non-hazardous wastes), located in Kern County, Kings County, and Imperial County.

Other Utility Systems

Electric power services to the site are provided by LADWP through overhead power lines on East 111th Place. Natural gas service is provided by Southern California Gas Company (SCG) through local distribution lines that are connected to high-pressure distribution lines on 108th Street and Central Avenue. Telecommunication services are provided by various private companies.

3.20.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections M.1, M.2, and G.1); LADWP UWMP; LACSD JWPCP.

Comment: A significant impact would occur if the project resulted in the need for new construction or expansion of water or wastewater treatment facilities and if the volume of stormwater runoff from the project increased to a level exceeding the capacity of the storm drain system serving the project site that could result in an adverse environmental effect that could not be mitigated.

Less than significant impact. The project site is currently served by existing utility systems, with overhead and underground lines on East 111th Place. The proposed project would abandon/remove existing utility connections and provide new ones to serve the project.

Water Demand. The project would be connected to the existing water line on East 111th Place. Water use during construction would be a minimal amount and a temporary demand. During project operations, assuming a water demand of 106 gallons per capita per day, the 312 employees at the site would generate a demand of 33,072 gpd (approximately 12 million gallons per year). Even if additional water demand is added for bus washing activities, the project's water demand would be a minor amount of the total annual water use in the City of 495,685 AF (1 AF = 325,851 gallons). Thus, the project is not anticipated to generate a major increase in the demand for water to require the construction of a new or expanded water service and supply facilities.

Wastewater Generation. The project would be connected to the existing sewer line on East 111th Place. Wastewater generation from the construction and operation of the project is expected to be a portion of water demand. There is 140 mgd of available capacity at the JWPCP to provide wastewater treatment to the project. Thus, the project is not anticipated to generate a major increase in wastewater to require the construction of new or expanded wastewater treatment facilities.

Storm Drainage. As discussed in Section 3.10.3, the site is largely paved and will remain largely paved with the project. The runoff will be directed to curbs and gutters and the underground storm drain line on East 111th place for conveyance to Compton Creek. No major change in volumes of runoff being discharged to the storm drain system is anticipated. Thus, no new or expanded stormwater drainage would be required.

Electric Power. Electrical power to the site is provided by LADWP through overhead lines on East 111th Place. Energy for the operation of the facility is expected to be provided by LADWP and the on-site PV system. As discussed in Section 3.6.3, the proposed project's peak electricity demand would be no more than 8 MW, and the LADWP capacity is approximately 8,000 MW, with an instantaneous peak demand of 6,502 MW experience in August 2017. Thus, there is more than sufficient capacity within the existing LADWP infrastructure to support the implementation of the proposed project and its peak and sustained electricity requirements. Also, given the size of the project, compared to the service area of LADWP, project demand on LADWP's electrical grid would be minimal and impacts would be less than significant.

Other Utilities. The project would not require natural gas services from SCG although there is an existing gas line on 111th Place. The potential provision of Wi-Fi and Broadband 5G telecommunications service could be through small-cell towers or fiber optic cabling by a private company with local telecommunication facilities. These services would be provided through connections to existing facilities on East 111th Place and would not require any major infrastructure upgrades.

To avoid the interruption of services to adjacent land uses during construction and new connections to the project, coordination with the affected utility agencies/companies will be made (SC-CF-1).

Standard Condition

To avoid utility service interruptions to adjacent land uses, the following Standard Condition would be implemented:

SC-CF-1: Before starting construction, the City of Los Angeles will notify and coordinate with affected utility providers to avoid service interruptions during peak periods or provide temporary backup services for interruptions during peak periods, as well as notify customers of scheduled service interruptions.

Project demand for utility services would not require the construction or expansion of existing services and facilities. Impacts would be less than significant, which would be ensured by SC-CF-1, and no mitigation is required.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Reference: L.A. CEQA Thresholds Guide (Section M.1); LADWP UWMP.

Comment: A significant would occur if the project would require water supplies that would result in a water shortage during normal, dry, or multiple dry years.

Less than significant impact. As discussed above, the construction and operation of the project would require a minor amount of water from LADWP and would not require new water supplies. During water shortages, water use at the project will also comply with the City's mandatory conservation measures. Impacts to available water supplies would be less than significant. No mitigation is required.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Reference: L.A. CEQA Thresholds Guide (Section M.2); LACSD JWPCP.

Comment: A significant impact would occur if the project generated wastewater in excess of what current wastewater treatment providers would be able to process.

Less than significant impact. As discussed above, the construction and operation of the project would generate wastewater that could be readily served by the remaining available capacity of 140 mgd at the JWPCP. Thus, impacts related to the need for wastewater treatment will be less than significant and no mitigation is required.

d) Would the project 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?

Reference: L.A. CEQA Thresholds Guide (Section M.3); City's Construction and Demolition Waste Recycling Ordinance; City's Zero Waste Plan.

Comment: The management of solid waste in the City involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. A significant impact may occur if the project were to increase solid waste generation to a degree that existing and projected landfill capacities would be insufficient to accommodate the additional waste. Further, a significant impact may occur if the project would generate solid waste that was in excess of or was not disposed of in accordance with applicable regulations.

Less than significant impact. Construction and operation of the project would generate solid wastes in the form of demolition debris, construction debris/wastes, and trash and debris/solid wastes from onsite activities. Contractor compliance with the City's Construction and Demolition Waste Recycling Ordinance (SC-UT-1) would promote the recycling and reuse of wastes and, in turn, reduce demand for landfill disposal. In addition, the project shall implement on-site recycling and other Zero Waste behaviors in accordance with the City's Zero Waste Plan (SC-UT-2). These standard conditions would reduce the amount of solid wastes requiring landfill disposal.

Standard Conditions

The project would comply with the following standard conditions to reduce the need for landfill disposal:

SC-UT-1: The Contractor shall comply with the City's Construction and Demolition Waste Recycling Ordinance by obtaining a permit before transporting construction and demolition waste, and transporting the wastes to City-certified construction and demolition waste-processing facilities.

SC-UT-2: In accordance with the City's Zero Waste Plan, the City shall implement recycling programs at the EBMF, which may include but not be limited to the phasing out expanded polystyrene foam takeout containers and single-use water bottles and the placement of recycling containers for a variety of materials such as beverage containers, newspaper, mixed paper, and other materials.

Impacts related to solid waste disposal would be less than significant with compliance with SC-UT-1 and SC-UT-2; no mitigation is required.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Reference: L.A. CEQA Thresholds Guide (Section M.3); City's Construction and Demolition Waste Recycling Ordinance; City's Zero Waste Plan.

Comment: A significant impact would occur if the proposed project generated solid waste that was in excess of or was not disposed of in accordance with applicable regulations.

Less than significant impact. The construction and operation of the project will comply with federal, state, and local statutes and regulations regarding solid waste. As discussed above, these include compliance with SC-HAZ-1 for the proper disposal of hazardous wastes and SC-UT-1 and SC-UT-2 for the recycling of construction and operational wastes. Impacts would be less than significant and no mitigation is required.

3.21 Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.21.1 Regulatory Setting

This section describes existing laws and regulations related to wildfire that apply to the project.

3.21.1.1 Federal

Federal Wildland Fire Management Policy

The 1995 Federal Fire Policy recognized the essential role of fire in maintaining natural systems. It was updated in 2001 and includes guiding principles for firefighter and public safety; the role of wildland fire as an essential ecological process and natural change agent; fire management plans, programs, and activities that support land and resource management plans; sound risk management; economically viable fire management programs and activities; use of best available science; public health and environmental quality considerations; federal, State, tribal, local, interagency, and international coordination and cooperation; and standardized policies and procedures.

3.21.1.2 State

2018 Strategic Fire Plan for California

The 2018 Strategic Fire Plan for California is a cooperative effort between the State Board of Forestry and Fire Protection and CalFire to address fire concerns in California, including adequate statewide fire protection of state responsibility areas. The plan addresses fire prevention, natural resource management, and fire suppression efforts.

Fire Hazard Severity Zones – Public Resources Code Sections 4201–4204

PRC Sections 4201–4204, directed CalFire to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, referred to as fire hazard severity zones (FHSZ), define the application of various mitigation strategies to reduce the risk associated with wildland fires.

Government Code Sections 51175–51189 established the classification for very high fire hazard severity based on fuel loading, terrain, weather, and other relevant factors identified by CalFire as major causes of wildfire spread and on the severity of fire hazard that is expected to prevail in those areas. The code established the requirements for those that maintain an occupied dwelling within a designated very high fire hazard severity zone (VHFHSZ).

California Building Code and Fire Code

CCR Title 24 is a compilation of building standards, including fire safety standards for residential and commercial buildings. The California Building Code standards serve as the basis for the design and construction of buildings in California. The California Fire Code is a component of the California Building Code and includes fire safety requirements related to the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The California Fire Code applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific California Fire Code regulations have been incorporated by reference, with amendments, in the Los Angeles Building Code, Fire Safety Regulations.

3.21.1.3 Local

City of Los Angeles General Plan Safety Element

The City's General Plan Safety Element identifies wildfire hazard areas in the City and sets specific policies and objectives related to hazard mitigation, emergency response, and disaster recovery, including standards for fire station distribution and location, fire suppression water flow (or "fire flow"), firefighting equipment access, emergency ambulance services, and fire prevention activities. It serves as a guide for the construction, maintenance, and operation of fire protection facilities in the City.

City of Los Angeles Hazard Mitigation Plan

The 2018 Hazard Mitigation Plan (HMP) was prepared to lessen the City's vulnerability to disasters and to reduce risks from natural hazards. It serves as a guide for decision-makers and commits City resources to minimize the effects of natural hazards. The HMP integrates with existing planning mechanisms such as building and zoning regulations, long-range planning mechanisms, and environmental planning and includes a hazard vulnerability analysis, community disaster mitigation priorities, and mitigation strategies and projects. The Los Angeles Department of Emergency Operations Organization (EOO) is responsible for implementing the Plan, including the City's emergency preparations (planning, training, and mitigation), response and recovery operations.

3.21.2 Existing Environment

There has been an increasing frequency and size of wildfires in the LA region, including historic brushfires in the City such as the La Tuna, Creek, and Skirball fires. Smaller brush fires have also been accidentally started by brush clearance activities. Under the direction of CalFire, the City has determined VHFHSZs within its jurisdiction, as defined in LAMC Sections 57.4908.1.1 through 57.4908.1.3. These VHFHSZ are located in the hilly and mountainous areas of the City. There are no large open areas or steep hillside areas on or near the project site. The site is not located in an area designated as a Very High, High, or Moderate Fire Hazard Severity Zone.

The LAFD responds to fire emergencies, including wildfires and brush fires. The HMP outlines the responsibilities of various City departments for providing emergency public information regarding emergency alerts and warnings, notifications, evacuations, and shelters.

3.21.3 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.2); City of Los Angeles General Plan Safety Element; CalFire Fire Hazard Severity Zones; Los Angeles Hazard Mitigation Plan.

Comment: A significant impact would occur if the project were to substantially impair an adopted emergency response plan or emergency evacuation plan.

No impact. The site is not located in the designated VHFHSZ. The project does not propose roadway improvements that could obstruct emergency response routes or emergency evacuation routes in the event of wildfires. While the project would include roadway, driveway, and sidewalk improvements for access to or from the project site, wildfire hazards are not present in or near the site. Also, travel lanes and driveways

would be maintained throughout the construction phase and adjacent sidewalk areas would still be available to provide access to nearby developments (SC-CC-2). As such, no impacts to emergency response and emergency evacuation during wildfires would occur. No mitigation is required.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.2); City of Los Angeles General Plan Safety Element; CalFire Fire Hazard Severity Zones; Los Angeles Hazard Mitigation Plan.

Comment: A significant impact may occur if construction or operation of the project exacerbates wildfire risks and thereby exposes project occupants to pollutant concentrations from a wildfire to a degree that would significantly affect the project occupants.

No impact. The site is highly urbanized and the project would not be located in an area with wildfire hazards. The project would be designed and constructed in accordance with the City's Building Code, including the Fire Code (SC-PS-1), and would not create fire hazards. The project would replace existing older buildings and remove the fire hazards associated with the existing structures. There are no steep slopes or large brush areas on or near the site that could create or exacerbate wildfire risks or contribute to the spread of wildfire. The project would not be located in or near wildfire hazard areas and would not expose people or property to wildfire hazards. No impacts would occur and no mitigation is required.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, 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?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.2); City of Los Angeles General Plan Safety Element; CalFire Fire Hazard Severity Zones; Los Angeles Hazard Mitigation Plan.

Comment: A significant impact would occur if the proposed project required the installation or maintenance of infrastructure that may exacerbate the fire risk or that may result in temporary or ongoing impact to the environment.

No impact. The project would not be located in or near wildfire hazard areas and does not propose the construction of new roads or the installation of new power lines in an area susceptible to wildfires. No emergency water sources or other utilities are proposed as part of the project. Power use would be obtained from the on-site photovoltaic system and existing power lines on East 111th Place. The electrical connections would be constructed in accordance with the City's Building Code and

would not create fire hazards (SC-PS-1). No impacts related to new infrastructure would occur and no mitigation is required.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.2); City of Los Angeles General Plan Safety Element; CalFire Fire Hazard Severity Zones; Los Angeles Hazard Mitigation Plan.

Comment: A significant impact would occur if the proposed project exposed people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

No impact. The project would not be located on steep slopes or in large brush areas that are susceptible to wildfires. The project would also be designed and constructed in accordance with the City's Building Code, including the Fire Code (SC-PS-1), and would not create wildfire hazards. Wildfires that result in flooding or landslides from runoff, post-fire slope instability, or drainage changes would not affect the project because it would not be located near and downstream of hills and mountains that carry wildfire risks. No impacts would occur and no mitigation is required.

3.22 Mandatory Findings

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3.22.1 Impact Analysis

Using the Initial Study Checklist questions in Appendix G of the CEQA Guidelines, Project impacts are analyzed for significance as follows:

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Reference: L.A. CEQA Thresholds Guide (2006); City of Los Angeles General Plan; Southeast Los Angeles Community Plan.

Comment: See Section 3.5 Biological Resources, Section 3.6, Cultural Resources, and Section 3.19, Tribal Cultural Resources.

Less than significant impact with mitigation incorporated. As discussed in Sections 3.5, 3.6, and 3.19, the project would not have the potential for adverse but less than significant impacts on biological and cultural resources and tribal cultural resources. Compliance with existing regulations (Standard Condition measures), incorporation of project design features (PDFs) into the project, and implementation of mitigation measures would ensure these impacts are less than significant. After the implementation of MM-BIO-1, the project would not 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Also, with the implementation of PDF-CUL-1, PDF-CUL-2, MM-PAL-1 through MM-PAL-4, SC-CUL-1, SC-CUL-2, and MM-TCR-1, the project would be ensured to not eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant with standard conditions adhered to and mitigation incorporated.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Reference: L.A. CEQA Thresholds Guide (2006); City of Los Angeles General Plan; Southeast Los Angeles Community Plan.

Comment: Cumulative impacts are two or more individual effects that, when considered together, are considerable or compounded and increase other environmental impacts. These impacts may be analyzed by considering a list of past, present, and possible future projects or through a summary of projections adopted in a local, regional, or statewide plan. See Sections 3.2 to 3.21 for the discussion of significant impacts for each environmental issue.

Less than significant impact. The related projects, for the cumulative impact analysis for this project, are any past, present, and foreseeable projects within the 0.5-mile radius from the project site, as listed in Table 3.22-1. Out of five projects identified, two are related to the proposed EBMF, including the LADOT Zero-Emission Bus Rollout Plan (#1) and the proposed new DASH shuttle buses for first mile/last mile connections to regional transit centers (#2). Project # 3, Taylor Charter Middle School Expansion, is located immediately east of the proposed project site, and Project #4 is a street improvement project on Avalon Boulevard (approximately 0.18-mile west of the site). Project #5 is being referred to as the Lanzit Industrial Site (approximately 0.16-mile east of the project site). The City of Los Angeles Economic and Workforce Development Department acquired this vacant property located at 10901 South Clovis Avenue in 1994 and has tried to redevelop this land; however, no developer has expressed any interest thus far.

Table 3.22-1: Related Projects

No.	Project	Size and Location	Status
1*	LADOT Zero-Emission Bus Rollout Plan	Purchase of 253 BEBs and installation of infrastructure and electric bus charging equipment at 3 existing City bus yards	Approved 2020, implemented 2020–2021
2*	RTP/SCS ID S1160301, S1160351	New DASH shuttle buses for first mile/last mile connections to regional transit centers	Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Project List adopted September 2020
3	Taylor Charter Middle School Expansion	Demolition of warehouse and construction of six modular classrooms, soccer field, lunch area shade structures, and other improvements at the adjacent Taylor Charter Middle School, located at 810–820 and 840 East 111 th Place, Los Angeles	Conditional Use Permit (CUP) approved
4	Avalon Boulevard Complete Street	Complete street treatments on Avalon Boulevard, which will include bicycle facilities, curb extensions, upgrade curb ramps to Americans with Disabilities Act (ADA) standards, pedestrian refuge islands, landscaped median island, pedestrian lighting, continental crosswalks, signal and striping modifications, and tree planting/landscaping.	Predesign (Construction in 2023 to 2026)
5	Lanzit Industrial Site	The City of Los Angeles Economic and Workforce Development Department acquired the vacant property located at 10901 South Clovis Avenue, Los Angeles (approximately 0.16-mile from the project site) in 1994 and has tried to identify a developer to redevelop this land; no developers have expressed any interest thus far.	Predesign

Note that while there are some small developments and street improvement projects proposed within 1.0 to 2.0 miles of the project site, these smaller developments and projects would not be considered major projects that would result in cumulative impacts with the project when considered by distance, type, and size of the projects.

In particular, the resurfacing of East 111th Place (from Stanford Avenue to Avalon Boulevard) is proposed in 2021–2022, which would occur before the start of project construction in mid-2024.

The cumulative impacts of the related projects are considered with the impacts of the project. The analysis below considers whether the project would result in a new significant cumulative impact or make a considerable contribution to an already significant cumulative impact.

Aesthetics. The project's impacts on aesthetics due to changes in visual quality would mainly occur on the site and East 111th Place. Implementation of PDF-V-1 through PDF-V-3 would reduce these visual impacts. The project and Projects #3 and #5 would improve the streetscape on East 111th Place and views from East 111th Place. Project #4 would improve the streetscape on Avalon Boulevard. Thus, cumulative changes in visual quality would be beneficial and the project's incremental contribution to cumulative impacts on aesthetics would be less than significant.

Agriculture and Forestry. As discussed in Section 3.3, no impacts on agriculture and forestry resources would occur with the project. The related projects are also not proposed on sites designated as Farmland or supporting agricultural activities or forestry. Thus, the project would not contribute to cumulative impacts on this resource.

Air Quality. The project and related projects would increase both mobile and stationary emissions in the South Coast Air Basin, as well as potentially expose sensitive receptors to pollutant concentrations. Existing SCAG, SCAQMD, and CARB regulatory programs, plans, policies, strategies, and mitigation measures imposed on individual developments and projects would help reduce air quality impacts and regional air pollution levels. While basin-wide emissions could result in a significant cumulative impact on air quality, the project itself would not exceed SCAQMD thresholds, which are set by SCAQMD to account for an individual project's contribution to other projects and activities occurring throughout the South Coast Air Basin. Air emissions generated by the construction of the project would be temporary and reduced to less than significant levels with compliance with applicable CARB and SCAQMD Rules and Regulations (SC-AQ-1) and coordination of construction schedules (MM-CUM-1). Long-term operations of the EBMF would support transit services and the use of non-polluting BEBs, which would result in improvements to air quality. Therefore, the project would not result in a cumulatively considerable contribution to a significant adverse air quality impact within the context of the Basin-wide impacts. Cumulative impacts on air quality would be less than significant.

Biological Resources. Because the project would be located on a site with no suitable habitat for sensitive species, it would not contribute to cumulatively significant impacts. Also, MM-BIO-1 would avoid impacts on nesting birds. The project's incremental contribution to cumulative impacts on biological resources would be less than significant after mitigation.

Cultural Resources. The project's impacts on cultural resources would be less than significant with the implementation of PDF-CUL-1, PDF-CUL-2, SC-CUL-1, SC-CUL-2, and MM-PAL-1 through MM-PAL-4. With the shallow excavation and ground disturbance needed for the construction of the project, its incremental contribution to cumulative impacts on cultural resources would be less than significant.

Energy. When considering the energy demands of the project and related projects and the energy demands in the entire City and the region, the energy demands of the project would represent a minimal amount of the available energy supplies and demand, as discussed in Section 3.7. In addition, the project would replace the Compton Facility, reducing the net increase in energy use and would be constructing critical infrastructure to support other projects associated with the City's efforts to reduce energy use as it transitions to a cleaner zero-emission bus fleet. Thus, the project's incremental contribution to cumulative impacts on energy would be less than significant.

Geology and Soils. Since geologic and seismic hazards are highly dependent on underlying soil conditions, they are site-specific and would not be considered cumulative. The project would not create or exacerbate a geologic or seismic hazard. In addition, the project and related projects would be located at scattered locations and would have to individually implement measures for structural stability and integrity, as required by State law and local building regulations. Thus, there is a potential for increased exposure to geologic and seismic hazards, which may be considered cumulatively significant impacts on geology and soils, but individual projects would implement measures to reduce these hazards and maintain public safety. With the implementation of SC-GEO-1 and SC-GEO-2, project contribution to impacts related to geology and soils would not be cumulatively considerable. Cumulative impacts would be less than significant.

Greenhouse Gas Emissions. The project and related projects would have the potential for generating GHG emissions that would contribute to global climate change. The GHG impact analysis in Section 3.9 shows that a limited amount of project-related GHG emissions (compared to City, State, and global GHG emissions) would be generated and the project is consistent with GHG reduction plans. Thus, the project's incremental contribution to cumulative GHG impacts is not considered cumulatively considerable. Cumulative impacts would be less than significant.

Hazards and Hazardous Materials. The project and related projects would utilize hazardous materials and generate hazardous wastes that have the potential to pose risks to public health and safety. However, there are numerous federal, state, regional, and local regulations that address the identification and proper transport, use, handling, storage, and disposal of hazardous materials and wastes, along with required plans and procedures to implement in the event of a spill, fire, or explosion that existing and future developments, facilities, and activities are required to follow to protect public health and safety. Remediation of soil vapor contamination (MM-HAZ-1), implementation of a Soil Management Plan (MM-HAZ-2), and implementation of operational and structural measures to protect site workers (MM-HAZ-3) would also

eliminate hazards from past land uses and activities at the site. With the implementation of these mitigation measures and compliance with various regulations on the proper handling, use, storage, and disposal of hazardous materials and wastes for the safety of both construction and maintenance workers and the general public (SC-HAZ-1 through SC-HAZ-5), the project is not expected to generate hazardous emissions or wastes during construction and operational activities that may pose hazards to the public. Consequently, its cumulative impacts involving hazards and hazardous materials would be less than significant.

Hydrology and Water Quality. The project and related projects would alter existing hydrology and water quality at individual sites but mandatory compliance with NPDES permits and implementation of BMPs to comply with applicable stormwater management requirements for pollution prevention would ensure that they do not degrade surface and groundwater quality; create flood hazards; or expose people and structures to inundation. Project compliance with these same regulations (SC-HYD-1 and SC-HYD-2) would reduce temporary hydrology and water quality impacts during construction and operation; and impacts would not be cumulatively considerable. In addition, limited changes in surface hydrology or groundwater supply and recharge would occur with the project would not increase impervious surfaces. Therefore, the project would not contribute to cumulatively significant impacts on hydrology and water quality and its cumulative impacts would be less than significant.

Land Use and Planning. The project would replace existing structures on the site and would not create a new barrier in the Green Meadows neighborhood. Also, the project would comply with SC-LU-1 to ensure the project would not conflict with applicable City land use plans and regulations. The project would also implement SC-CC-1 through SC-CC-3 to prevent impacts related to access within the community. Thus, the project would not have a significant impact and would not make a considerable contribution to any cumulative impact on land use and planning. Cumulative impacts on land use and planning would be less than significant.

Mineral Resources. As discussed in Section 3.13, the project would use a minor amount of mineral resources for construction and operational activities. Less than significant impacts on mineral resources of value to the State or City would occur; and the project would not contribute to the depletion of these resources. The project's incremental contribution to cumulative impacts on mineral resources would be considered less than significant.

Noise. While the project and related projects would have the potential to increase ambient noise levels in the City, the project's temporary construction noise impacts would be reduced by the implementation of MM-NOI-1. The implementation of MM-CUM-1 would avoid concurrent construction activities near one another and would reduce cumulative noise impacts from the construction of the project and Projects #3, #4, and #5. During long-term operations, the project would not contribute to the ambient noise environment in a significant manner and the use of BEBs would reduce roadway noise from transit buses used by LADOT. The project's incremental contribution to cumulative noise impacts would be less than significant after mitigation.

Population and Housing. As discussed in Section 3.15, the project would not increase the population and housing stock of the City but would bring in 312 jobs to the site. Along with the other related projects, it would increase the employment base of the project area, resulting in beneficial impacts. Accordingly, no cumulative adverse impacts on population and housing would occur with the project.

Public Services. The project and related projects would increase demands for public services, including fire protection, police protection, but would not affect school services, parks, libraries, and other public facilities. With compliance with the City's Fire Code (SC-PS-1), cumulative impacts on fire protection services would be less than significant. As State, regional, and local governments provide public services to acceptable levels to meet demand, it is anticipated that cumulative impacts would be less than significant with individual project compliance with fire prevention regulations and as new facilities and augmented services are provided by service agencies and providers. Thus, the project may have a periodic need for fire protection and police protection services but is not an incremental contribution to cumulative impacts on public services would be less than significant.

Recreation. The project and related projects are not expected to create a demand for parks and recreational facilities. Since the project would have no adverse impacts on recreation; thus, it would not contribute to cumulative impacts on this resource.

Transportation. In the long-term, the project and related projects are expected to increase vehicle, transit, bikeway, and sidewalk use. Increases in vehicle miles traveled and traffic volumes on streets and freeways would add to traffic congestion and degraded levels of service at roadway segments and intersections. As discussed in Section 3.18, the number of vehicle trips associated with the construction and operation of the proposed project is not expected to substantially affect roadway and intersection volumes and operations with the implementation of PDF-TR-1, which would also serve Project #3. The project would also comply with SC-TR-1 to avoid the creation of traffic hazards. At the same time, Projects #1 and #2 would improve transit services and Project #4 would enhance alternative transportation in the City. The project would have no cumulatively significant traffic impacts during operation.

During construction, the project and related projects could have cumulative traffic impacts on East 111th Place and Avalon Boulevard. To avoid these impacts, MM-CUM-1 requires coordination with the construction schedules of the project and Projects #3, #4, and #5 to avoid concurrent and cumulative impacts from construction-related traffic on the same roadways and intersections in the area. Thus, the project's incremental contribution to cumulative impacts on transportation would be less than significant.

Tribal Cultural Resources. Ground disturbance and excavation associated with the project and related projects would have the potential to disturb undiscovered buried TCRs, which would be a significant cumulative impact. Compliance with AB 52 and consultations with local tribes would reduce individual impacts. The project would implement MM-TCR-1 to ensure impacts would be avoided on TCRs that may be

found in native soils underlying the site during excavation activities for the construction of the project. This would reduce the project's incremental contribution to cumulative impacts on TCRs. Cumulative impacts on TCRs would be less than significant.

Utilities and Service Systems. The project and related projects would generate demands for water supply and service, wastewater treatment and disposal, storm drainage, solid waste collection and disposal, power and natural gas supplies, and/or telecommunication services. Implementation of SC-CC-1 and SC-UT-1 through SC-UT-2 would reduce project demands for utility services. Also, since private and public entities provide the necessary resources, infrastructure, and services to meet demands, it is anticipated that cumulative impacts would be less than significant with their provision of expanded/improved utility infrastructure and services. As discussed in Section 3.20, the project would not create substantive new demands for utilities and service systems but would instead primarily rely on the existing infrastructure and resource networks. The project's incremental contribution to cumulative impacts on utilities and service systems would be less than significant.

Wildfire. The project and related projects would not be located in or near wildfire hazard areas and would not be exposed to wildfire hazards. The project would have no adverse impacts related to wildfire; thus, it would not contribute to cumulative impacts on this resource.

Mitigation Measures

The following mitigation measure would be implemented to avoid cumulative traffic impacts:

MM-CUM-1: The construction schedules of other projects in the vicinity should be coordinated with each other through communication among City departments and staff to avoid cumulatively affecting vehicle traffic, pedestrians, and bicyclists on Avalon Boulevard and East 111th Place.

Project impacts would not be cumulatively considerable and it would not contribute to cumulatively significant impacts from the related projects, with the implementation of MM-CUM-1. The project's incremental contribution to cumulative impacts would be less than significant after mitigation.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Reference: L.A. CEQA Thresholds Guide (2006).

Comment: See Sections 3.2 to 3.21 above for a discussion of the project's significant adverse impacts for each environmental issue.

Less than significant impact with mitigation incorporated. The project would have potentially significant impacts related to hazards and hazardous materials, noise, and

traffic/transportation. However, with the implementation of mitigation measures MM-BIO-1, MM-PAL-1 through MM-PAL-4, MM-HAZ-1 through MM-HAZ-3, MM-NOI-1, MM-TCR-1, and MM-CUM-1, impacts would be less than significant.

4.0 DETERMINATION – RECOMMENDED ENVIRONMENTAL DOCUMENTATION

4.1 Summary

The analysis in this Initial Study and the supporting technical reports indicate that the project would potentially result in significant adverse environmental impacts on biological resources, paleontological resources, hazards and hazardous materials, noise, and tribal cultural resources. It also has the potential for cumulative impacts. The impacts can be mitigated to less than significant levels with compliance with SCs, incorporation of PDFs, and the implementation of mitigation measures MM-BIO-1, MM-PAL-1 through MM-PAL-4, MM-HAZ-1 through MM-HAZ-3, MM-NOI-1, MM-TCR-1, and MM-CUM-1. With these mitigation measures, a Mitigated Negative Declaration may be adopted by the City in compliance with CEQA.

4.2 Recommendation Environmental Documentation

The City will adopt a Mitigated Negative Declaration before making a decision on the project.

5.0 PREPARATION AND CONSULTATION

5.1 Preparers

Parsons

Anne Kochaon, Program Manager
Greg King, QA/QC Manager
Josephine Alido, Principal Planner/Task Manager
Andrew Leavitt, Principal Geologist
Nak Kim, PE, Principal Traffic Engineer
Thanh Luc, Noise Specialist/Manager
Greg Berg, Senior Noise Control Specialist
Alex Kirkish, RPA, Archaeologist
Jeff Lormand, Landscape Architect/Visual and Aesthetic Specialist
Katherine Ryan, Environmental Planner, GIS Specialist
Elizabeth Koos, Editor

Terry Hayes and Associates

Anders Sutherland, Senior Environmental Scientist

Paleo Solutions

Kristina Lindgren, RPA, Archaeologist
Courtney Richards, Paleontologist
Dean Reed, Architectural Historian

Katherine Padilla and Associates

Katherine Padilla, President, Public Outreach Manager
Jessica Padilla-Bowen, Senior Associate
Lorena Hernandez, Project Manager

5.2 Coordination and Consultation

City of Los Angeles Bureau of Engineering, Environmental Management Group

Lauren Rhodes, Environmental Specialist II
Jan Rebstock Green, Environmental Supervisor II

City of Los Angeles Bureau of Engineering, Department of Transportation

Clare Lahey, Transportation Engineering Associate
Kari Derderian, Head of Transit Development

California Native American Heritage Commission

Gabrieleño Band of Mission Indians – Kizh Nation

Gabrielino Tongva Indians of California Tribal Council

Gabrielino/Tongva Nation

Gabrielino-Tongva Tribe

Gabrielino/Tongva San Gabriel Band of Mission Indians

Santa Rosa Band of Cahuilla Indians

Soboba Band of Luiseno Indians

6.0 REFERENCES

- California Air Resources Board (ARB). 2021. AB 32 Climate Change Scoping Plan. <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan>.
- California Department of Conservation (CDOC). 2021a. California Farmland Mapping and Monitoring Program. <https://www.conservation.ca.gov/dlrp/FMMP/Pages/Index.aspx>.
- . 2021b. Williamson Act Program. <https://www.conservation.ca.gov/dlrp/wa>.
- . 2021c. Fault Activity Map of California. <https://maps.conservation.ca.gov/cgs/fam/>.
- . 2021d. CGS Information Warehouse: Regulatory Maps. <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>.
- . 2021e. Wellfinder. <https://maps.conservation.ca.gov/doggr/wellfinder/#/>.
- . 2021f. CGS Information Warehouse: Mineral Land Classification. <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>.
- . 1986. Earthquake Zones of Required Investigation, Inglewood Quadrangle.
- California Department of Finance (DOF). 2021, May. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. <https://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.
- California Department of Fish and Wildlife (CDFW). 2021a. NCCP Plan Summaries. <https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans>.
- . 2021b, May. California Natural Diversity Database (CNDDB) for Inglewood Quadrangle.
- California Department of Forestry and Fire Protection (CalFire). 2021. FHSZ Viewer. <https://egis.fire.ca.gov/FHSZ/>.
- California Department of Toxic Substances Control (DTSC). 2021. Envirostor. <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=800+East+111th+Place%2C+Los+Angeles%2C+Ca>.
- California Department of Transportation (Caltrans). 2021a. Standard Environmental Reference, Chapter 27: Visual and Aesthetics Review. <https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser>.

- . 2021b. California State Scenic Highways.
<https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.
- California Department of Water Resources (DWR). 2021. Basin Prioritization.
<https://water.ca.gov/programs/groundwater-management/basin-prioritization>.
- California Employment Development Department (EDD). 2021, June. Labor Force and Unemployment Rate for Cities and Census Designated Places.
<https://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html>
- California Energy Commission. 2020. California Energy Consumption Database.
<https://ecdms.energy.ca.gov/>.
- . 2019. Final 2019 Integrated Energy Policy Report.
<https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report>.
- California Environmental Protection Agency (CalEPA). 2021. Cortese List Data Resources. <https://calepa.ca.gov/sitecleanup/corteselist/>.
- California Native Plant Society (CNPS). 2021. Inventory of Rare and Endangered Plants of California for Inglewood quadrangle.
- California Office of Historic Preservation. 2021. California Historical Resources.
<https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=30>.
- City of Los Angeles. 2021a. City of Los Angeles Municipal Code.
https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-107363.
- . 2021b, May. Historic-Cultural Monument (HCM) List.
https://planning.lacity.org/odocument/24f6fce7-f73d-4bca-87bc-c77ed3fc5d4f/Historical_Cultural_Monuments_List.pdf.
- . 2021c. City of Los Angeles Administrative Code.
https://codelibrary.amlegal.com/codes/los_angeles/latest/laac/0-0-0-7036.
- . 2021d. Los Angeles City Planning, Demographics.
<https://planning.lacity.org/resources/demographics>.
- . 2021e. General Plan Overview. <https://planning.lacity.org/plans-policies/general-plan-overview>.
- . 2021f. Southeast Los Angeles Community Plan.
<https://planning.lacity.org/plans-policies/community-plan-area/southeast-los-angeles>.

- . 2021g. Southeast Los Angeles Community Plan Implementation Overlay. <https://planning.lacity.org/plans-policies/overlays/southeast-los-angeles>.
- . 2021h, February 1. 2019 Southeast Los Angeles Demographic Profile.
- . 2021i. Zone Information and Map Access System (ZIMAS). <http://zimas.lacity.org/>.
- . 2021j. NavigateLA. <https://navigatela.lacity.org/navigatela/>.
- . 2020, October. LADOT Transit Zero-Emission Bus Rollout Plan.
- . 2019, December. LADOT, Feasibility Study for an All-Electric Bus Facility.
- . 2018a. L.A.'s Green New Deal, Sustainability pLAN 2019. <https://plan.lamayor.org/>.
- . 2018b. 2018 Local Hazard Mitigation Plan. https://emergency.lacity.org/sites/g/files/wph1791/files/2021-03/2018_LA_HMP_Final_2018-11-30.pdf.
- . 2007. GREEN LA, An Action Plan to Lead the Nation In Fighting Global Warming. https://planning.lacity.org/eir/8150Sunset/References/4.E.%20Greenhouse%20Gas%20Emissions/GHG.26_City%20LA%20GreenLA%20ActionPlan.pdf.
- . 2006. L. A. CEQA Thresholds Guide. <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf>.
- . 2005, June. Stormwater Drainage Map Images. https://navigatela.lacity.org/common/mapgallery/stormwater_images.cfm. Accessed December 1, 2021.
- . 2003, September. Wastewater S-Maps Images. <https://navigatela.lacity.org/common/mapgallery/smmaps.cfm>. Accessed December 1, 2021.
- County of Los Angeles. 2009. Airport Land Use Commission (ALUC). <https://planning.lacounty.gov/aluc/airports#anc-apm>.
- Federal Emergency Management Agency (FEMA). 2021. FEMA's National Flood Hazard Layer (NFHL) Viewer. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>.
- Federal Highway Administration (FHWA). 2021. America's Byways. <https://www.fhwa.dot.gov/byways/>.

- . 2017, June. Roadway Construction Noise Model (RCNM) User's Guide. https://www.fhwa.dot.gov/ENVIRONMENT/noise/construction_noise/rcnm/index.cfm.
- Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment Manual. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.
- Los Angeles Bureau of Sanitation and Environment (LASAN). 2021. Solid Waste Integrated Resources Plan (SWIRP). https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afLoop=11782647297412885&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=8dht6qexx_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D11782647297412885%26_afWindowMode%3D0%26_adf.ctrl-state%3D8dht6qexx_5.
- . 2012, October. City of Los Angeles Solid Waste Integrated Resources Plan (a Zero Waste Master Plan). <https://www.lacitysan.org/san/sandocview?docname=cnt012522>.
- Los Angeles County Sanitation Districts. 2021. Joint Water Pollution Control Plant (JWPCP). <https://www.lacsd.org/services/wastewater-sewage/facilities/joint-water-pollution-control-plant>.
- Los Angeles County Metropolitan Transportation Authority. 2010. 2010 Congestion Management Program.
- Los Angeles Department of Recreation and Parks. 2021. Who We Are. <https://www.laparks.org/departments/who-we-are>.
- Los Angeles Department of Transportation (LADOT). 2020, July. Transportation Assessment Guidelines. https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf.
- Los Angeles Department of Water and Power (LADWP). 2020. Urban Water Management Plan. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpLn;jsessionid=wLysgdKfvvlwZGKnblNg8hggnLGrH8y01kpbKpnpdspvTy m0021L!1605159942?_afLoop=1018729042348199&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D1018729042348199%26_afWindowMode%3D0%26_adf.ctrl-state%3D1a08pj24b_4.

- . 2017. 2017 Power Strategic Long-Term Resource Plan. https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=3cspi3he8_17&NF=1%3FNF=1&&_afLoop=1015889209652267.
- . 2013. Facts and Figures. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures;jsessionid=qLlpgc9RxbNpf7ywnx1MNpdrJP0mrR10sxKRJ1Rb9Zc1xNnJN67v!1605159942?_afLoop=1015419012913433&_afWindowMode=0&_afWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D1015419012913433%26_afrWindowMode%3D0%26_adf.ctrl-state%3D3cspi3he8_4.
- Los Angeles Fire Department (LAFD). 2021a. Our Mission. <https://www.lafd.org/about/about-lafd/our-mission>.
- . 2021b. HazMat. <https://www.lafd.org/about/special-operations/hazmat>.
- . 2021c. Station 64 Response Metrics for 2021. <https://www.lafd.org/fsla/stations-map?station=64&community=South%20Los%20Angeles&year=2021#>.
- . 2018. Strategic Plan. <https://www.lafd.org/about/about-lafd/strategic-plan#:~:text=The%20Los%20Angeles%20Fire%20Department's,first%20ever%20LAFD%20Strategic%20Plan.&text=With%20the%20collective%20efforts%20of,create%20a%20more%20optimal%20LAFD>.
- Los Angeles Police Department (LAPD). 2021. Inside the LAPD. https://www.lapdonline.org/inside_the_lapd.
- Los Angeles Regional Water Quality Control Board. 2020, May. Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html.
- . 2013, June. Order No. R4-2013-095, NPDES No. CAG994004. https://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/permits/general/npdes/r4-2013-0095/Dewatering%20Order.pdf.
- Los Angeles Unified School District (LAUSD). 2021a. About the Los Angeles Unified School District. <https://achieve.lausd.net/domain/32>.
- . 2021b. Local District Map. <https://achieve.lausd.net/domain/34>.
- National Oceanic and Atmospheric Administration (NOAA). 2021. National Marine Fisheries Services (NMFS) database for Inglewood quadrangle.
- Paleo Solutions. 2022. Paleontological Resources Analysis.

- Parsons. 2022a. Noise and Vibration Impact Analysis.
- . 2022b. Visual Impact Assessment.
- . 2022c. Transportation/Traffic Impact Assessment.
- . 2022d. Community Impact Assessment.
- . 2022e. Archaeological Resources Assessment.
- . 2022f. Soils and Geology Memo.
- . 2022g. Hazardous Materials Memo.
- . 2022h. Historic Resources Evaluation Report.
- Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources.
- South Coast Air Quality Management District (SCAQMD). 2021a. Air Quality Management Plan (AQMP). <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.
- . 2021b. Rules. <http://www.aqmd.gov/home/rules-compliance/rules>.
- . 2021c. Regulations. <http://www.aqmd.gov/home/rules-compliance/regulations>.
- . 2021d. Air Quality Analysis Handbook. <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.
- . 2017. California Emissions Estimator Model (CalEEMod) version 2020.4.0.
- . 1993. CEQA Air Quality Handbook.
- Southern California Association of Governments. September 2020. 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. <https://scag.ca.gov/read-plan-adopted-final-plan>.
- Stantec. 2019a, May. Phase I Environmental Site Assessment – 740 E & 800 E 111th Place, Los Angeles, California 90059
- . 2019b, October. Phase II Environmental Site Assessment and Additional Site Assessment Report.

- State Water Resources Control Board (SWRCB). 2021a. Geotracker.
<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=800+East+111th+Place%2C+Los+Angeles%2C+CA>.
- . 2021b. Construction Stormwater Program.
https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html.
- . 2021c. Industrial Stormwater Program.
https://www.waterboards.ca.gov/water_issues/programs/stormwater/industrial.html.
- Terry A. Hayes and Associates (TAHA). 2022a. Air Quality Impact Assessment
- . 2022b. Greenhouse Gas Emissions Analysis.
- . 2022c. Energy Memo.
- US Fish and Wildlife Service (USFWS). 2021a. Critical Habitat for Threatened & Endangered Species.
<https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>.
- . 2021b. National Wetlands Inventory Wetlands Mapper.
<https://www.fws.gov/wetlands/data/Mapper.html>.
- . 2021c, May. Information for Planning and Consultation (IPaC) Explore Location Services.
- US Forest Service (USFS). 2021. National Forest Locator Map.
<https://www.fs.fed.us/ivm/>.
- US Geological Survey (USGS). 2021. The National Map – Advanced Viewer.
<https://apps.nationalmap.gov/viewer/>.
- . 2018. Inglewood Quadrangle, California – Los Angeles County, 7.5-minute Topographic Map Series.
- US National Park Service. 2021. National Register of Historic Places, National Register Database and Research.
<https://www.nps.gov/subjects/nationalregister/database-research.htm>.