

City of Los Angeles

Department of City Planning • Environmental Analysis Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



INITIAL STUDY MITIGATED NEGATIVE DECLARATION Southeast Los Angeles Community Plan Area

Kaiser Permanente Watts Learning Center and Health Pavilion Project ZA-2017-1062-ZV; ENV-2017-1063-MND

Project Location: 1453 – 1525 E. 103rd Street and 10220 S. Success Avenue, Los Angeles, CA 90002

Council District: 15 – Joe Buscaino

Project Description: The Proposed Project includes the redevelopment of the existing Kaiser Permanente Watts Counseling and Learning Center (“Center”) site. Redevelopment of the site would occur in two phases. The first phase would include the temporary relocation of the existing counseling and administrative functions of the center to a leased portion of the adjacent City of Los Angeles municipal building, specifically the existing but vacant Fire Station No. 65 space located at 1525 East 103rd Street, while the Center’s existing Preschool Education for Parents and Children (PEPC) will be temporarily relocated to the Drew Children’s Development Corporation site during construction of the Proposed Project. Phase 1 would require interior renovations of the existing fire station facility to accommodate the Center’s temporary uses. Phase 2 of the Proposed Project would include the demolition of the existing Watts Counseling and Learning Center at 1463 E. 103rd Street (APN 6048-012-026) and a vacant library building at 1501-1505 E. 103rd Street (APN 6048-012-930) and the construction of a new 60,000 square-foot building with 36,500 square feet of medical office space and 23,500 square feet for the new Watts Counseling and Learning Center space. Parking would be provided in 1 ½ levels of subterranean parking and a ½ level above grade within the new medical office building with up to 230 parking spaces. Upon completion the proposed counseling and learning center space would include the PEPC, which is planned to accommodate up to 30 students (eight additional students as compared to existing operations). A new drop-off/pick-up zone is proposed along the north side of 103rd Street. The Proposed Project would include an outdoor play area and a public plaza fronting E. 103rd Street. Primary vehicular access to the parking garage would be provided via a full-access driveway along Success Avenue. The Proposed Project would include 60,000 square feet of total floor area resulting in a floor area ratio (FAR) of 1.1:1.

Phase 1 of the Proposed Project would require approval of the following discretionary actions: (1) a Variance from Los Angeles Municipal Code (LAMC) Sections 12.04.09 B and 12.23 B.7 (a), to allow the change in use of a leased space within an existing municipal building in the Public Facility (PF) zone to a privately operated community services center on an interim basis; and (2) a Variance from LAMC 12.26.E.5 to allow for off-site parking within 750 feet of the Project Site by lease agreement in lieu of a recorded covenant. Phase 2 of the Proposed Project would require (1) the approval of Conditional Use Permit (CUP) for a Commercial Corner Development; and (2) a General Plan Amendment and Zone Change for the library parcel from Public Facility (PF-1) to Commercial (C4-1) to accommodate the proposed new Watts Counseling and Learning Center and medical office space; and (3) a Site Plan Review to allow new construction of over 50,000 sf of non-residential floor area. The Proposed Project would also require approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, and haul route (for the export of approximately 40,500 cy of soil).

APPLICANT:

Kaiser Foundation Health Plan,
Inc.

PREPARED BY:

Parker Environmental Consultants

ON BEHALF OF:

The City of Los Angeles
Department of City Planning
Environmental Review Section

March 2018

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Carlberg Associates, City of Los Angeles Tree Report, 1465-1501 East 103rd Street, Los Angeles, California 90002, July 4, 2017.

APPENDIX C: Adaptive Reuse Assessment

Architectural Resources Group, Adaptive Reuse Assessment, Watts Engine Company No. 65, 1525 E. 103rd Street, Los Angeles, January 25, 2017.

Architectural Resources Group, Memorandum Re: Watts Engine Company No. 65, 1525 E. 103rd Street, Los Angeles, August 18, 2017.

APPENDIX D: Geotechnical Investigation

TGR Geotechnical, Inc., Updated Preliminary Geotechnical Investigation Report, Proposed Kaiser Medical Office Building/Learning Center with Subterranean Parking Garage, 1465, 1501, and 1525 East 103rd Street, Los Angeles, California, January 17, 2017.

APPENDIX E: Greenhouse Gas Emissions Calculations Worksheets

APPENDIX F: Environmental Site Assessment

F1: Stantec Consulting Services, Inc., Phase I Environmental Site Assessment Report, 1501 E. 103rd Street, Los Angeles, California, December 20, 2016.

F2: Stantec Consulting Services, Inc., Phase I Environmental Site Assessment Report, 1525 E. 103rd Street, Los Angeles, California, December 20, 2016.

F3: Stantec Consulting Services, Inc., Asbestos, Lead-Based Paint, Polychlorinated Biphenyls in Caulk, and Other Hazardous Materials Survey, December 23, 2016.

F4: Stantec Consulting Services, Inc., Limited Phase II Environmental Site Assessment Report, 1501 E. 103rd Street, Los Angeles, California, March 14, 2017.

- F5: Stantec Consulting Services, Inc., Limited Phase II Environmental Site Assessment Report, 1525 E. 103rd Street, Los Angeles, California, March 14, 2017.
- APPENDIX G: Noise Monitoring Data And Calculation Worksheets
- APPENDIX H: Traffic Study
- H1: Linscott, Law & Greenspan, Engineers, Traffic Impact Study, Kaiser Permanente Watts Learning Center and Health Pavilion Project, August 2, 2017.
- H2: Los Angeles Department of Transportation, Traffic Impact Assessment for the Proposed Mixed Use Medical Office/Counseling Center Located at 1463 East 103rd Street, (LADOT Case No. HRB17-105790), August 23, 2017.
- APPENDIX I: Energy Calculation Worksheets
- APPENDIX J: Water Quality Assessment Report
- Stantec Consulting Services, Inc., Watts Firehouse Redevelopment Project, Water Quality Assessment Report, 1525 East 103rd Street, Los Angeles, California, July 17, 2017.
- APPENDIX K: Service Request Letters
- Los Angeles Bureau of Sanitation, Sewer Capacity Availability Request (SCAR), 1465 E. 103rd Street, Submitted June 30, 2017.

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK

ROOM 395, CITY HALL

LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles		COUNCIL DISTRICT: 15 – Joe Buscaino
PROJECT TITLE: Kaiser Watts Learning Center and Health Pavilion Project	ENVIRONMENTAL CASE: ENV-2017-1063-MND	CASE NO.: ZA-2017-1062-ZV
PROJECT LOCATION: 1451 – 1525 E. 103 rd Street and 10220 S. Success Avenue, Los Angeles, CA 90002		
<p>PROJECT DESCRIPTION: The Proposed Project includes the redevelopment of the existing Kaiser Permanente Watts Counseling and Learning Center (“Center”) site. Redevelopment of the site would occur in two phases. The first phase would include the temporary relocation of the existing counseling and administrative functions of the center to a leased portion of the adjacent City of Los Angeles municipal building, specifically the existing but vacant Fire Station No. 65 space located at 1525 East 103rd Street, while the Center’s existing Preschool Education for Parents and Children (PEPC) will be temporarily relocated to the Drew Children’s Development Corporation site during construction of the Proposed Project. Phase 1 would require interior renovations of the existing fire station facility to accommodate the Center’s temporary uses. Phase 2 of the Proposed Project would include the demolition of the existing Watts Counseling and Learning Center at 1463 E. 103rd Street (APN 6048-012-026) and a vacant library building at 1501-1505 E. 103rd Street (APN 6048-012-930) and the construction of a new 60,000 square-foot building with 36,500 square feet of medical office space and 23,500 square feet for the new Watts Counseling and Learning Center space. Parking would be provided in 1 ½ levels of subterranean parking and a ½ level above grade within the new medical office building with up to 230 parking spaces. Upon completion the proposed counseling and learning center space would include the PEPC, which is planned to accommodate up to 30 students (eight additional students as compared to existing operations). A new drop-off/pick-up zone is proposed along the north side of 103rd Street. The Proposed Project would include an outdoor play area and a public plaza fronting E. 103rd Street. Primary vehicular access for to the parking garage would be provided via a full-access driveway along Success Avenue. The Proposed Project would include 60,000 square feet of total floor area resulting in a floor area ratio (FAR) of 1.1:1.</p> <p>Phase 1 of the Proposed Project would require approval of the following discretionary actions: (1) a Variance from Los Angeles Municipal Code (LAMC) Sections 12.04.09 B and 12.23 B.7 (a), to allow the change in use of a leased space within an existing municipal building in the Public Facility (PF) zone to a privately operated community services center on an interim basis; and (2) a Variance from LAMC 12.26.E.5 to allow for off-site parking within 750 feet of the Project Site by lease agreement in lieu of a recorded covenant. Phase 2 of the Proposed Project would require (1) the approval of Conditional Use Permit (CUP) for a Commercial Corner Development; and (2) a General Plan Amendment and Zone Change for the library parcel from Public Facility (PF-1) to Commercial (C4-1) to accommodate the proposed new Watts Counseling and Learning Center and medical office space; and (3) a Site Plan Review to allow new construction of over 50,000 sf of non-residential floor area. The Proposed Project would also require approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, and haul route (for the export of approximately 40,500 cy of soil).</p>		
NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY		
Kaiser Foundation Health Plan, Inc. 393 East Walnut Street, 4 th Floor Pasadena, CA 91188		
FINDING: The Department of City Planning of the City of Los Angeles has proposed that a Mitigated Negative Declaration be adopted for this Project. The mitigation measures outlined on the attached pages would reduce any potentially significant adverse effects to a level of insignificance.		
SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED		
Any written comment received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the adopted mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.		
THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.		
NAME OF PERSON PREPARING FORM Jordann Turner	TITLE City Planner	TELEPHONE NUMBER (213) 978-1365
ADDRESS 200 North Spring Street, 7 th Floor Los Angeles, CA 90012	SIGNATURE (Official) 	DATE April 16, 2018

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK, ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles		COUNCIL DISTRICT: CD 15		DATE: March 2018	
RESPONSIBLE AGENCIES: Department of City Planning					
ENVIRONMENTAL CASE: ENV-2017-1063-MND			RELATED CASES: ZA-2017-1062-ZV		
PREVIOUS ACTIONS CASE NO.			<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.		
PROJECT LOCATION: 1453 – 1525 E. 103 rd Street and 10220 S. Success Avenue, Los Angeles, CA 90002					
<p>PROJECT DESCRIPTION: The Proposed Project includes the redevelopment of the existing Kaiser Permanente Watts Counseling and Learning Center (“Center”) site. Redevelopment of the site would occur in two phases. The first phase would include the temporary relocation of the existing counseling and administrative functions of the center to a leased portion of the adjacent City of Los Angeles municipal building, specifically the existing but vacant Fire Station No. 65 space located at 1525 East 103rd Street, while the Center’s existing Preschool Education for Parents and Children (PEPC) will be temporarily relocated to the Drew Children’s Development Corporation site during construction of the Proposed Project. Phase 1 would require interior renovations of the existing fire station facility to accommodate the Center’s temporary uses. Phase 2 of the Proposed Project would include the demolition of the existing Watts Counseling and Learning Center at 1463 E. 103rd Street (APN 6048-012-026) and a vacant library building at 1501-1505 E. 103rd Street (APN 6048-012-930) and the construction of a new 60,000 square-foot building with 36,500 square feet of medical office space and 23,500 square feet for the new Watts Counseling and Learning Center space. Parking would be provided in 1 ½ levels of subterranean parking and a ½ level above grade within the new medical office building with up to 230 parking spaces. Upon completion the proposed counseling and learning center space would include the PEPC, which is planned to accommodate up to 30 students (eight additional students as compared to existing operations). A new drop-off/pick-up zone is proposed along the north side of 103rd Street. The Proposed Project would include an outdoor play area and a public plaza fronting E. 103rd Street. Primary vehicular access for to the parking garage would be provided via a full-access driveway along Success Avenue. The Proposed Project would include 60,000 square feet of total floor area resulting in a floor area ratio (FAR) of 1.1:1.</p> <p>Phase 1 of the Proposed Project would require approval of the following discretionary actions: (1) A Variance from Los Angeles Municipal Code (LAMC) Sections 12.04.09 B and 12.23 B.7 (a), to allow the change in use of a leased space within an existing municipal building in the Public Facility (PF) zone to a privately operated community services center on an interim basis; and (2) a Variance from LAMC 12.26.E.5 to allow for off-site parking within 750 feet of the Project Site by lease agreement in lieu of a recorded covenant. Phase 2 of the Proposed Project would require (1) the approval of Conditional Use Permit (CUP) for a Commercial Corner Development; and (2) a General Plan Amendment and Zone Change for the library parcel from Public Facility (PF-1) to Commercial (C4-1) to accommodate the proposed new Watts Counseling and Learning Center and medical office space; and (3) a Site Plan Review to allow new construction of over 50,000 sf of non-residential floor area. The Proposed Project would also require approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, and haul route (for the export of approximately 40,500 cy of soil).</p>					
PROJECT LOCATION: 1463 – 1525 E. 103 rd Street and 10220 S. Success Avenue, Los Angeles, CA 90002					
COMMUNITY PLAN AREA: Southeast Los Angeles		AREA PLANNING COMMISSION: South Los Angeles		CERTIFIED NEIGHBORHOOD COUNCIL: Watts	
STATUS: <input type="checkbox"/> Preliminary <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Adopted (2000)		<input checked="" type="checkbox"/> Does Conform to Plan <input type="checkbox"/> Does NOT Conform to Plan			
EXISTING ZONING: PF-1, C4-1		MAX DENSITY ZONING: 1.5:1 FAR		LA River Adjacent: No	
GENERAL PLAN LAND USE: Public Facilities, Community Commercial		MAX. DENSITY PLAN: 1.5:1 FAR		PROPOSED PROJECT DENSITY: 1.1:1	

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

<i>Jonathan D. ...</i>	City Planner	213-978-1365
Signature	Title	Phone

Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it 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).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHEMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.</p>					
<p>I. AESTHETICS</p>					
a.	WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	WOULD THE PROJECT SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	WOULD THE PROJECT SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	WOULD THE PROJECT CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>II. AGRICULTURE AND FOREST RESOURCES</p>					
a.	WOULD THE PROJECT CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE, 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.	WOULD THE PROJECT 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.	WOULD THE PROJECT CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(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.	WOULD THE PROJECT 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.	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 TO NON-FOREST USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III. AIR QUALITY					
a.	WOULD THE PROJECT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD AIR QUALITY MANAGEMENT PLAN OR CONGESTION MANAGEMENT PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	WOULD THE PROJECT VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	WOULD THE PROJECT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	WOULD THE PROJECT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	WOULD THE PROJECT CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IV. BIOLOGICAL RESOURCES					
a.	WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS 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.	WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS 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.	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	WOULD THE PROJECT CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. CULTURAL RESOURCES					
a.	WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	WOULD THE PROJECT 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.	WOULD THE PROJECT DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VI. GEOLOGY AND SOILS					
a.	WOULD THE PROJECT EXPOSE PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING MAP ISSUED BY THE STATE GEOLOGIST FOR THE AREA OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT, CAUSED IN WHOLE OR IN PART BY THE PROJECT'S EXACERBATION OF THE EXISTING ENVIRONMENTAL CONDITIONS. REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	WOULD THE PROJECT EXPOSE PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	INVOLVING STRONG SEISMIC GROUND SHAKING CAUSED IN WHOLE OR IN PART BY THE PROJECT'S EXACERBATION OF THE EXISTING ENVIRONMENTAL CONDITIONS?				
c.	WOULD THE PROJECT EXPOSE PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION CAUSED IN WHOLE OR IN PART BY THE PROJECT'S EXACERBATION OF THE EXISTING ENVIRONMENTAL CONDITIONS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	WOULD THE PROJECT EXPOSE PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING LANDSLIDES, CAUSED IN WHOLE OR IN PART BY THE PROJECT'S EXACERBATION OF THE EXISTING ENVIRONMENTAL CONDITIONS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	WOULD THE PROJECT RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	WOULD THE PROJECT BE LOCATED ON A GEOLOGIC UNIT 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 CAUSED IN WHOLE OR IN PART BY THE PROJECT'S EXACERBATION OF EXISTING ENVIRONMENTAL CONDITIONS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	WOULD THE PROJECT BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL RISKS TO LIFE OR PROPERTY CAUSED IN WHOLE OR IN PART BY THE PROJECT EXACERBATING THE EXPANSIVE SOIL CONDITIONS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h.	WOULD THE PROJECT HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTE WATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTE WATER?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. GREENHOUSE GAS EMISSIONS					
a.	WOULD THE PROJECT 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.	WOULD THE PROJECT CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	GREENHOUSE GASES?				
III. HAZARDS AND HAZARDOUS MATERIALS					
a.	WOULD THE PROJECT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 EXACERBATE CURRENT ENVIRONMENTAL CONDITIONS SO AS TO RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXACERBATE CURRENT ENVIRONMENTAL CONDITIONS SO AS TO RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	WOULD THE PROJECT IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h.	WOULD THE PROJECT EXACERBATE EXISTING HAZARDOUS ENVIRONMENTAL CONDITIONS BY BRINGING 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. HYDROLOGY AND WATER QUALITY					

a.	WOULD THE PROJECT VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	WOULD THE PROJECT SUBSTANTIALLY DEplete GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	WOULD THE PROJECT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	WOULD THE PROJECT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	WOULD THE PROJECT CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	WOULD THE PROJECT OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	WOULD THE PROJECT PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h.	WOULD THE PROJECT PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	WOULD THE PROJECT EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INQUIRY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j.	WOULD THE PROJECT EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING INUNDATION BY SEICHE, TSUNAMI, OR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	MUDFLOW?				
X. LAND USE AND PLANNING					
a.	WOULD THE PROJECT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	WOULD THE PROJECT CONFLICT WITH APPLICABLE LAND USE PLAN, POLICY OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT (INCLUDING BUT NOT LIMITED TO THE GENERAL PLAN, SPECIFIC PLAN, COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	WOULD THE PROJECT CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XI. MINERAL RESOURCES					
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XII. NOISE					
a.	DOES THE PROJECT RESULT IN THE EXPOSURE OF PERSONS TO OR GENERATION OF NOISE IN LEVEL 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.	DOES THE PROJECT RESULT IN THE EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	WOULD THE PROJECT RESULT IN A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	WOULD THE PROJECT RESULT IN A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	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?				
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIII. POPULATION AND HOUSING					
a.	WOULD THE PROJECT INDUCE SUBSTANTIAL POPULATION GROWTH IN AN AREA EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE, THROUGH EXTENSION OF ROADS OR OTHER INFRASTRUCTURE)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	WOULD THE PROJECT DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	WOULD THE PROJECT DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIV. PUBLIC SERVICES					
a.	WOULD THE PROJECT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED GOVERNMENT 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 OBJECTIVE FOR ANY OF THE FOLLOWING 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii.	SCHOOLS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii.	PARKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv.	OTHER PUBLIC FACILITIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XV. RECREATION					
a.	WOULD THE PROJECT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED?				
b.	DOES THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XVI. TRANSPORTATION AND TRAFFIC					
a.	WOULD THE PROJECT CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE OR POLICY ESTABLISHING MEASURES OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM, TAKING INTO ACCOUNT ALL MODES OF TRANSPORTATION INCLUDING MASS TRANSIT AND NON-MOTORIZED TRAVEL AND RELEVANT COMPONENTS OF THE CIRCULATION SYSTEM, INCLUDING BUT NOT LIMITED TO INTERSECTIONS, STREETS, HIGHWAYS AND FREEWAYS, PEDESTRIAN AND BICYCLE PATHS AND MASS TRANSIT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	WOULD THE PROJECT CONFLICT WITH AN APPLICABLE CONGESTION MANAGEMENT PROGRAM, INCLUDING BUT NOT LIMITED TO LEVEL OF SERVICE STANDARDS AND TRAVEL DEMAND MEASURES, OR OTHER STANDARDS ESTABLISHED BY THE COUNTY CONGESTION MANAGEMENT AGENCY FOR DESIGNATED ROADS OR HIGHWAYS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	WOULD THE PROJECT RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	WOULD THE PROJECT SUBSTANTIALLY INCREASE HAZARDS TO A 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"/>
e.	WOULD THE PROJECT RESULT IN INADEQUATE EMERGENCY ACCESS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	WOULD THE PROJECT CONFLICT WITH ADOPTED POLICIES, PLANS OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVII. TRIBAL CULTURAL RESOURCES					
	WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANT OF A TRIBAL CULTURAL RESOURCES, DEFINED IN PUBLIC RESOURCES CODE SECTION 21074 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS:				
a.	LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC CODE SECTION 5020.1(K)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
XVIII. UTILITIES AND SERVICE SYSTEMS					
a.	WOULD THE PROJECT EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	WOULD THE PROJECT REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	WOULD THE PROJECT REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW STORMWATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	WOULD THE PROJECT HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	WOULD THE PROJECT RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	EXISTING COMMITMENTS?				
f.	WOULD THE PROJECT BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT’S SOLID WASTE DISPOSAL NEEDS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	WOULD THE PROJECT COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XIX. MANDATORY FINDINGS OF SIGNIFICANCE					
a.	DOES THE PROJECT HAVE THE POTENTIAL TO DEGRADE THE QUALITY OF THE ENVIRONMENT, SUBSTANTIALLY REDUCE THE HABITAT OF FISH OR WILDLIFE SPECIES, CAUSE A FISH OR WILDLIFE POPULATION TO DROP BELOW SELF-SUSTAINING LEVELS, THREATEN TO ELIMINATE A PLANT OR ANIMAL COMMUNITY, REDUCE THE NUMBER OR RESTRICT THE RANGE OF A RARE OR ENDANGERED PLANT OR ANIMAL OR ELIMINATE IMPORTANT EXAMPLES OF THE MAJOR PERIODS OF CALIFORNIA HISTORY OR PREHISTORY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	DOES THE PROJECT HAVE IMPACTS WHICH ARE INDIVIDUALLY LIMITED, BUT CUMULATIVELY CONSIDERABLE? (“CUMULATIVELY CONSIDERABLE” MEANS THAT THE INCREMENTAL EFFECTS OF AN INDIVIDUAL 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology – Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on Applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the project site, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the Applicant’s project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles’s Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The project as identified in the project description may cause potentially significant impacts on the environment without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as **ENV-2017-1063-MND** and the associated case(s), **ZA_2017-1062-ZV**. Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall project impacts(s) on the environment (after mitigation) **will not**:

- Substantially degrade environmental quality.
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the EIR Unit, Room 763, City Hall.

For City information, addresses, and phone numbers: visit the City’s website at <http://www.lacity.org>; City Planning- and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or EIR Unit, City Hall, 200 N Spring Street, Room 763. Seismic Hazard Maps – <http://gmw.consrv.ca.gov/shmp/> Engineering/Infrastructure/Topographic Maps/Parcel Information – <http://boemaps.eng.ci.la.ca.us/index0.1htm> or City’s main website under the heading “Navigate LA.”

PREPARED BY: Parker Environmental Consultants	TITLE:	TELEPHONE NO.: (661) 257-2282	DATE: March 2018
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APPENDIX A: ENVIRONMENTAL IMPACTS EXPLANATION TABLE

	Impact	Explanation	Mitigation Measures
I. AESTHETICS			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
II. AGRICULTURAL RESOURCES			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
III. AIR QUALITY			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
IV. BIOLOGICAL RESOURCES			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	BIO-1
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
V. CULTURAL RESOURCES			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	CR-1
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required
c.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	CR-2
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required
VI. GEOLOGY AND SOILS			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
h.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
VII. GREENHOUSE GAS EMISSIONS			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
VIII. HAZARDS AND HAZARDOUS MATERIALS			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	HAZ-1, HAZ-2
c.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	HAZ-3, HAZ-4
d.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	HAZ-1, HAZ-2, HAZ-3, HAZ-4
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	See T-1
h.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
IX. HYDROLOGY AND WATER QUALITY			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
h.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
i.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
j.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
X. LAND USE AND PLANNING			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XI. MINERAL RESOURCES			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XII. NOISE			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	N-1, N-2, N-3, N-4
b.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	N-1, N-2, N-3, N-4

	Impact	Explanation	Mitigation Measures
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	N-1, N-2, N-3, N-4
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XIII. POPULATION AND HOUSING			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XIV. PUBLIC SERVICES			
a.i	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
a.ii	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	PS-1, PS-2
a.iii	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
a.iv	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
a.v	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XV. RECREATION			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XVI. TRANSPORTATION AND TRAFFIC			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	T-1, T-2, T-3
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
XVII. TRIBAL CULTURAL RESOURCES			
a.i	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
a.i i	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XVIII. UTILITIES AND SERVICE SYSTEMS			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XIX. MANDATORY FINDINGS OF SIGNIFICANCE			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	See mitigation measures above.

SUMMARY OF MITIGATION MEASURES

AESTHETICS

No mitigation measures are required.

AGRICULTURE AND FORESTRY RESOURCES

No mitigation measures are required.

AIR QUALITY

No mitigation measures are required.

BIOLOGICAL RESOURCES

BIO-1 (Habitat Modification (Nesting Native Birds)):

- Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) shall take place outside of the breeding bird season which runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).
- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
 - Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
 - If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
 - Alternatively, the Qualified Biologist shall continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

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

CULTURAL RESOURCES

CR-1 Cultural Resources (Designated Historic-Cultural Resource)

- The recommendations in the Adaptive Reuse Assessment (dated January 25, 2017), and the Memorandum (dated August 18, 2017) shall be implemented to the satisfaction City of Los Angeles Department of City Planning in order to minimize the damage done to historic finishes and features of the former Watts Engine Company No. 65. As the plans evolve beyond the schematic level, compliance with the Secretary of the Interior's Standards for Rehabilitation shall be reviewed, monitored, and carried out by the Department of City Planning.

CR-2 Paleontological Resources

- If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. Deposits that are deemed by the paleontologist as constituting "unique paleontological resources" shall be treated in accordance with federal, State, and local guidelines, including preservation in place and avoidance, where feasible, or recovery and curation at a credentialed institution.

GEOLOGY AND SOILS

No mitigation measures are required.

GREENHOUSE GAS EMISSIONS

No mitigation measures are required.

HAZARDS AND HAZARDOUS MATERIALS

HAZ-1: Soil Management Plan

- A Soils Management Plan (SMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated soils can be properly handled, segregated, stockpiled and disposed of at a licensed disposal facility. Proper handling of the contaminated media would be required regardless of the contamination source.

HAZ-2: Removal of Hazardous Materials

- Prior to the issuance of any use of land, grading, or building permit, the applicant shall obtain a sign-off from the Fire Department indicating that all on-site hazardous materials, including and soil or groundwater contamination, have been fully remediated to the satisfaction of LAFD pursuant to local, regional, and federal regulations regarding maximum permissible concentration levels for the specific contaminants detected, or that the proposed project will not impede proposed or on-going remediation measures.

HAZ-3: Construction Activity Near Schools

- The Applicant and contractors shall maintain ongoing contact with the administrators of Thomas Riley High School and Compton Avenue Elementary School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323) 342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- The Applicant shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety during construction.
- There shall be no staging or parking of construction vehicles, including vehicles to transport workers on 103rd Street, adjacent to the schools.
- Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on 103rd Street, adjacent to the schools, during school hours.

HAZ-4 Schools Affected by Haul Route

- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the identified schools during periods when school is in session, and especially when students are arriving or departing from the campus.

HYDROLOGY AND WATER QUALITY

No mitigation measures are required.

LAND USE AND PLANNING

No mitigation measures are required.

MINERAL RESOURCES

No mitigation measures are required.

NOISE**Increased Noise Levels (Demolition, Grading, and Construction Activities)**

- N-1** Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.
- N-2** Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- N-3** The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material capable of achieving a 10-dBA reduction in sound level.
- N-4** The Applicant shall provide a courtesy notice of the Project's construction related activities to the Watts Library, Children's Institute, Thomas Riley High School, and homeowner's associations a minimum of two weeks prior to commencement of construction. An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any actionable complaints shall be rectified within 24 hours of their receipt.

POPULATION AND HOUSING

No mitigation measures are required.

PUBLIC SERVICES**PS-1 Public Services (Police – Demolition/Construction Sites)**

- Temporary construction fencing shall be placed along the periphery of the active construction areas to screen construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

PS-2 Public Services (Police)

- The plans shall incorporate design features (outlined in LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design") relative to security, semi-public and private spaces, which may include but is not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213)

486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

RECREATION

No mitigation measures are required.

TRANSPORTATION AND TRAFFIC

T-1 Compliance with LADOT

- Implementing measure(s) detailed in the Department of Transportation's communication to the Planning Department (DOT Case No. HRB17-105790), dated August 23, 2017 and attached shall be complied with. Such report and mitigation measure(s) are incorporated herein by reference.

T-2 Construction Management Plan

A Construction Management Plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The Construction Management Plan would include the following elements:

- All construction related traffic shall be restricted to off-peak hours.
- Construction parking would be located on-site, within adjacent lots, street, and underground parking garage so as not to disrupt on-going traffic along 103rd Street.
- The construction site entrance/exit would be located on Success Avenue.
- All delivery truck loading and unloading shall take place on site or within the boundaries of an approved traffic control plan in order to reduce the effect of traffic flow on surrounding arterial streets.
- The sidewalk along 103rd Street shall be covered with lighting for safe pedestrian access. The pedestrian sidewalk along Success Avenue would be temporarily closed during construction. The Applicant shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.

T-3 Transportation Haul Route

The Transportation Haul Route shall include the following elements:

- The Applicant shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- The loading and staging area shall be located on the Project Site near the proposed construction entrance/exit, and there shall be no staging of hauling trucks on any streets adjacent to the Project Site.
- No hauling shall be done before 9 A.M. and after 3 P.M.

- Trucks shall be spaced so as to discourage a convoy effect.
- A minimum of two flag persons are required. One flag person is required at the entrance to the Project Site and one flag person at the next intersection along the haul route.
- Truck crossing signs are required within 300 feet of the exit of the Project Site in each direction.
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times shall provide reasonable control of dust caused by wind.
- Loads shall be secured by trimming and watering or may be covered to prevent the spilling or blowing of the earth material.
- Trucks and loads are to be cleaned at the export site to prevent blowing dirt and spilling of loose earth.
- A log documenting the dates of hauling and the number of trips (i.e. trucks) per day shall be available on the job site at all times.
- The Applicant shall identify a construction manager and provide a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading and construction.

TRIBAL CULTURAL RESOURCES

No mitigation measures are required.

UTILITIES AND SERVICE SYSTEMS

No mitigation measures are required.

MANDATORY FINDINGS OF SIGNIFICANCE

See above mitigation measures.

I. INTRODUCTION

PROJECT INFORMATION

Project Title: Kaiser Permanente Watts Learning Center and Health Pavilion Project

Project Location: 1463 – 1525 E. 103rd Street and 10220 S. Success Avenue
Los Angeles, CA 90002

Project Applicant: Kaiser Foundation Health Plan, Inc.
315 W. 9th Street, Suite 801
Los Angeles, CA 90015

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 721
Los Angeles, CA 90012

PROJECT SUMMARY

The Proposed Project includes the redevelopment of the existing Kaiser Permanente Watts Counseling and Learning Center (“Center”) site. Redevelopment of the site would occur in two phases. The first phase would include the temporary relocation of the existing counseling and administrative functions of the center to a leased portion of the adjacent City of Los Angeles municipal building, specifically the existing but vacant Fire Station No. 65 space located at 1525 East 103rd Street, while the Center’s existing Preschool Education for Parents and Children (PEPC) will be temporarily relocated to the Drew Children’s Development Corporation site during construction of the Proposed Project. Phase 1 would require interior renovations of the existing fire station facility to accommodate the Center’s temporary uses. Phase 2 of the Proposed Project would include the demolition of the existing Watts Counseling and Learning Center at 1463 E. 103rd Street (APN 6048-012-026) and a vacant library building at 1501-1505 E. 103rd Street (APN 6048-012-930) and the construction of a new 60,000 square-foot building with 36,500 square feet of medical office space and 23,500 square feet for the new Watts Counseling and Learning Center space. Parking would be provided in 1 ½ levels of subterranean parking and a ½ level above grade within the new medical office building with up to 230 parking spaces. Upon completion the proposed counseling and learning center space would include the PEPC, which is planned to accommodate up to 30 students (eight additional students as compared to existing operations). A new drop-off/pick-up zone is proposed along the north side of 103rd Street. The Proposed Project would include an outdoor play area and a public plaza fronting E. 103rd Street. Primary vehicular access to the parking garage would be provided via a full-access driveway along Success Avenue. The Proposed Project would include 60,000 square feet of total floor area resulting in a floor area ratio (FAR) of 1.1:1.

Entitlement Requests

Phase 1 of the Proposed Project would require approval of the following discretionary actions: (1) a Variance from Los Angeles Municipal Code (LAMC) Sections 12.04.09 B and 12.23 B.7 (a), to allow the change in use of a leased space within an existing municipal building in the Public Facility (PF) zone to a privately operated community services center on an interim basis; and (2) a Variance from LAMC 12.26.E.5 to allow for off-site parking within 750 feet of the Project Site by lease agreement in lieu of a recorded covenant. Phase 2 of the Proposed Project would require (1) the approval of Conditional Use Permit (CUP) for a Commercial Corner Development; and (2) a General Plan Amendment and Zone Change for the library parcel from Public Facility (PF-1) to Commercial (C4-1) to accommodate the proposed new Watts Counseling and Learning Center and medical office space; and (3) a Site Plan Review to allow new construction of over 50,000 sf of non-residential floor area. The Proposed Project would also require approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, and haul route (for the export of approximately 40,500 cy of soil).

ORGANIZATION OF THE INITIAL STUDY

This expanded IS/MND is organized into six sections as follows:

Initial Study Checklist: This Section contains the completed IS Checklist showing the significance level under each environmental impact category.

Introduction: This Section provides introductory information such as the Proposed Project title, the Project Applicant, and the lead agency for the Proposed Project.

Project Description: This Section provides a detailed description of the Proposed Project including the environmental setting, project characteristics, related project information, and environmental clearance requirements.

Environmental Impact Analysis: This Section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist. Where the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Preparers and Persons Consulted: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

References, Acronyms and Abbreviations: This Section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

II. PROJECT DESCRIPTION

A. PROJECT LOCATION

PROJECT LOCATION

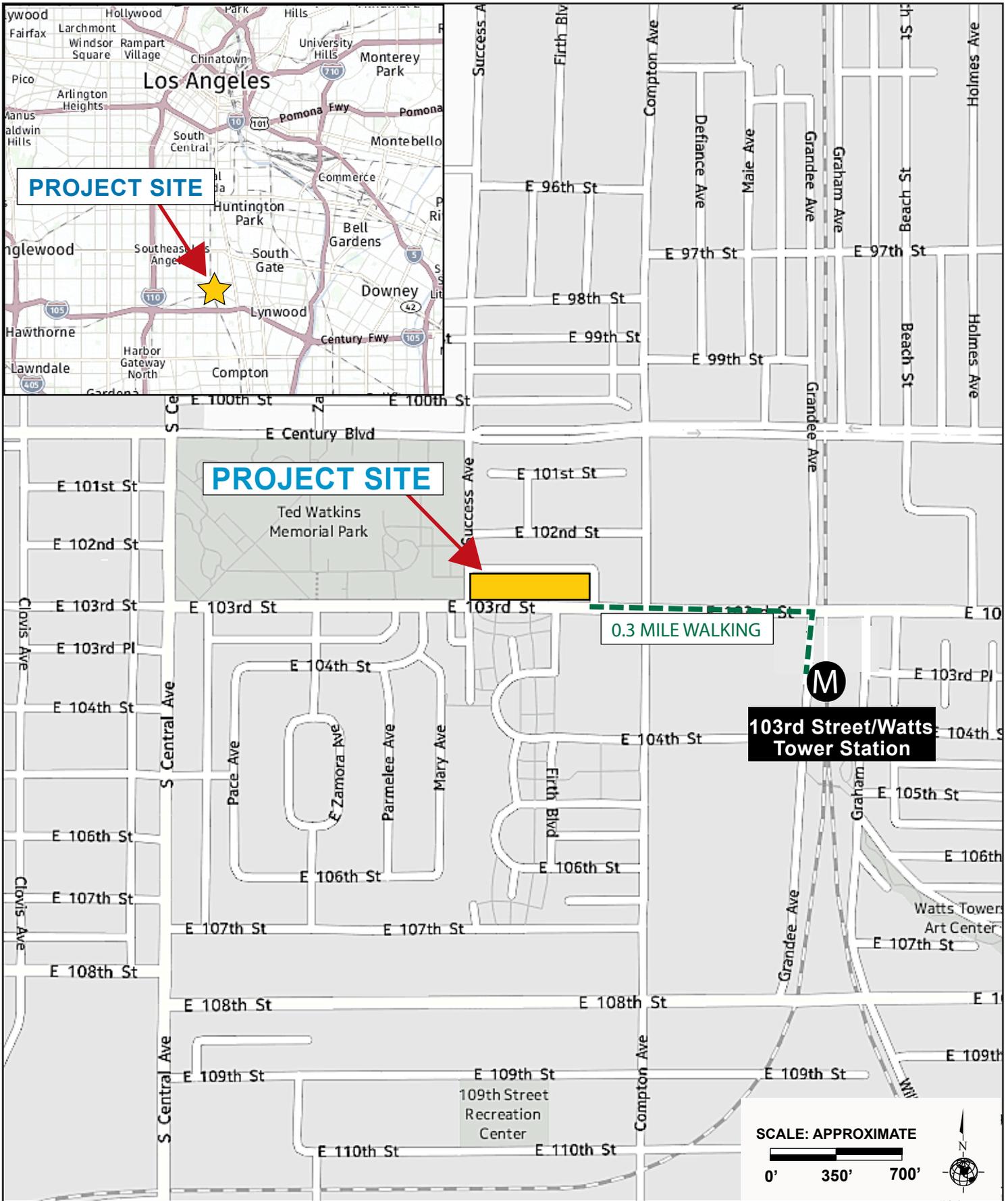
The Project Site is located within the boundaries of the Watts community in the Southeast Los Angeles Community Plan area, approximately 11 miles south of Downtown Los Angeles. The Proposed Project is rectangular-shaped and located at 1451 - 1525 E. 103rd Street and 10220 S. Success Avenue. The Project Site includes approximately 77,459 square feet (1.78 acres) of lot area. As shown in Figure II-1, Project Location Map, the Project Site is generally bounded by E. 103rd Street to the south, the Children's Institute and surface parking to the north, Success Avenue to the west, and a Chase bank to the east. The addresses, Assessor's Parcel Numbers (APN), and lot areas associated with the Project Site are identified below in Table II-1.

Table II-1
Summary of Parcels Associated with Project Site

Address	APN	Land Use	Lot Area (Square Feet)
1451 – 1479 E. 103 rd Street 10220 S. Success Avenue	6048-012-026	Kaiser Permanente Watts Counseling and Learning Center / Preschool Education for Parents and Children (10,604 sf)	32,290.9
1501-1505 E. 103 rd Street	6048-012-930	Vacant City-owned library	22,392.3
1513-1525 E. 103 rd Street	6048-012-931	Watts Civic Center and vacant fire station (11,965 sf)	22,775.8
TOTAL:			77,459.0
<i>Source: City of Los Angeles Planning Department, ZIMAS, 2017.</i>			

Regional and Local Access

Regional access to the Project Site is provided by the Pasadena/Harbor Freeway (I-110/SR 110), located approximately two miles to the west. This freeway also provides access to the Golden State/Santa Ana Freeway (I-5), the Hollywood Freeway (US-101), and the San Bernardino Freeway (I-10) and Pomona Freeway (SR-60), which are all located to the north of the Project Site. The Century Freeway (I-105) is located approximately one mile south of the Project Site and connects from the Los Angeles International Airport to Norwalk.



Source: Yahoo Maps, 2017.

Local street access is provided by the grid roadway system surrounding the Project Site. The City's General Plan and Mobility Plan classify street designations in the Project vicinity. E. 103rd Street is an east-west street located immediately adjacent to the south of the Project Site. It is a two-way street providing one travel lane in each direction and is classified as a Collector Street in the City's Mobility Plan. Compton Avenue is a north-south street located approximately 280 feet east of the Project Site. It is a two-way street providing one lane of travel in each direction and is classified as an Avenue I in the City's Mobility Plan. Success Avenue is located immediately west of the Project Site and is designated as a Local Street in the Mobility Plan. 102nd Street is an east-west street located less than 200 feet north of the Project Site and is classified as a Local Street in the Mobility Plan. E. Century Boulevard is an east-west street located approximately 0.1 mile north of the Project Site. It is a two-way street providing two travel lanes of travel in each direction and is classified as an Avenue I in the Mobility Plan. This street provides access to the I-110 Freeway.

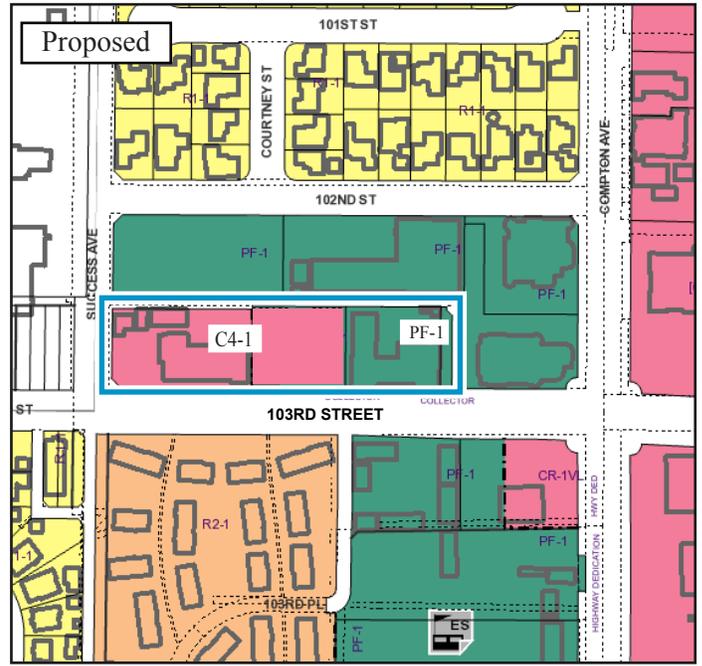
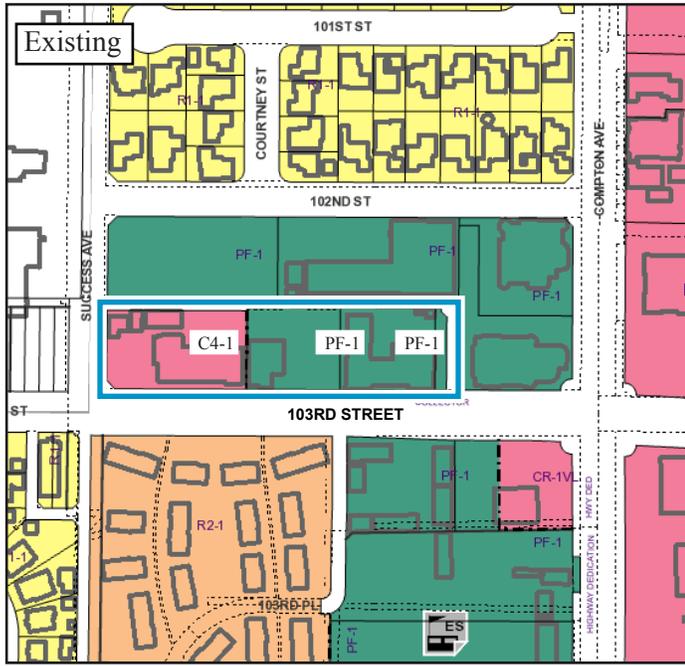
The Project area is currently served by the Los Angeles County Metropolitan Transportation Authority (Metro) and the LADOT DASH. Metro also operates two rail lines in the Project area: the Metro Blue Line and the Green Line. The Metro Blue Line stops at the 103rd Street/Watts Towers Station, approximately 0.3 mile (walking distance) east of the Project Site. The Metro Blue Line connects from Downtown Los Angeles to Long Beach. The Metro Green Line runs from Norwalk to Redondo Beach with the closest stop at the Avalon Station. The Project vicinity is served by eleven Metro bus lines (48, 51/52/351, 53, 55/355, 117, 202, 254, and 612) and the LADOT DASH Watts Line.

The Metro Blue Line provides connection to the Metro Purple Line and the Metro Red Line at the 7th Street/Metro Center in Downtown Los Angeles. Due to its proximity to the 103rd Street/Watts Towers Metro Station, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

ZONING AND LAND USE DESIGNATIONS

The zoning designation for the Project Site is PF-1 (Public Facilities Zone) on the eastern portion and C4-1 (Commercial Zone) on the western portion. The General Plan land use designation for the eastern portion of the Project Site is Public Facilities, which allows for publicly owned and government owned land uses, such as farming, public parking facilities, fire stations, police stations, government buildings, public libraries, post offices, public health facilities, and public schools. The General Plan land use designation for the western portion of the Project Site is Community Commercial, which allows for any uses (with a few exceptions) permitted in a C2 Zone such as medical office buildings and day care centers. Zones corresponding to the Public Facilities designation includes the PF zone. Zones corresponding to the Community Commercial designation includes CR, C2, C4, and RAS3 Zones. The Project Site is located in Height District No. 1, which does not specify a height restriction for a PF Zone. Height District No. 1 does not specify a height restriction for a C4 Zone but limits development to a FAR of 1.5:1. Figure II-2, Zoning and General Plan Designations, shows the existing zonings and land use designations on the Project Site and in the surrounding area.

Zoning Designations



LEGEND

- Project Site
- Zoning: C4, C2, CV
- Zoning: PF
- Elementary School
- Zoning: R2
- Zoning: R1

General Plan Land Use Designations



LEGEND

- Project Site
- Public Facilities
- General Commercial
- Low Medium I Residential
- Community Library
- Fire Station
- Community Commercial
- Low Residential
- Neighborhood Commercial
- Municipal Office Building
- Public Elementary School

Source: ZIMAS, City of Los Angeles, Department of City Planning, 2017.

The Project Site is located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the Project area. Namely, these plans and policy areas include the following: the Southeast Los Angeles Community Plan area, the South Los Angeles Alcohol Sales Specific Plan area, and a Los Angeles State Enterprise Zone (ZI-2374). The Project Site is also designated as a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.¹

Southeast Los Angeles Community Plan

The Project Site is located within the Southeast Los Angeles Community Plan ("Community Plan") area of the City of Los Angeles. The Southeast Los Angeles Community Plan was developed in the context of promoting a vision of the Southeast area as a community that looks at its past with pride and approaches its future with eagerness, while maintaining its individual identity by:

- Preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of compatible new housing opportunities.
- Improving the function, design, and economic vitality of the commercial corridors.
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.
- Maximizing the development opportunities of the future transit system while minimizing any adverse impacts.
- Planning the remaining commercial and industrial development opportunity sites for needed job producing uses that improves the economic and physical condition of the Southeast Community Plan Area.

The City is currently in the process of adopting a new Southeast Los Angeles Community Plan. A draft version was circulated for review from November 3, 2016 through February 1, 2017, and the estimated adoption date is scheduled for the end of 2017.

South Los Angeles Alcohol Sales Specific Plan

The Project Site is located within the South Los Angeles Sales Specific Plan area. This area is generally bounded by the Santa Monica Freeway to the north and the City boundaries on the east, south, and west. The Conditional Use Approval for Sale of Alcoholic Beverages Specific Plan (Ordinance No. 171,681) became effective September 13, 1997 as a response to improve the peace, health, safety and general welfare problems in the area. The Specific Plan requires a conditional use approval for establishments dispensing for sale or other consideration alcoholic beverages, including beer and wine, for off-site consumption.

¹ *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>, accessed March 2017.*

EXISTING CONDITIONS

As shown in Figure II-3, Aerial Photograph of the Project Site and Surrounding Land Uses, the Project Site is currently occupied by three buildings: a single-story municipal building, located at 1525 E. 103rd Street, that contains the Watts Civic Center and a vacant fire station (formerly Fire Station No. 65), the former City Watts Library building located at 1501 E. 103rd Street, the current Kaiser Watts Counseling and Learning Center located at 1645 E. 103rd Street. The Watts Civic Center is located on the western portion of the municipal building at 1525 E. 103rd Street, and the vacant fire station occupies the eastern half of the building. The fire station and the library portion of the Project Site are zoned PF-1. The building located at 1463-1465 E. 103rd Street is occupied by the Watts Counseling and Learning Center, operated by Kaiser Permanente. The Preschool Education for Parents and Children (PEPC) is also located within the Watts Counseling and Learning Center, which is a full day early childhood education program currently serving 22 students. The learning center and preschool portion of the Project Site is zoned C4-1. Surface parking is located north and east of the library building and at the existing Center.

Access to the Project Site is provided from three driveways located off E. 103rd Street: one on each end of the Civic Center/Fire Station building and one driveway east of the vacant library building. Three driveways are provided from the existing alleyway for the former library building and the Watts Counseling and Learning Center. The two driveways west of the Civic Center/Fire Station building is gated to prevent access during non-operational hours. An additional driveway is provided from 102nd Street that provides additional parking and connects to the east side of the fire station to 103rd Street.

There are six identified street trees located in the public right-of-way: four fronting 103rd Street and two street trees fronting Success Avenue. According to the Tree Report, prepared by Carlberg Associates (Appendix B of this IS/MND), there are approximately 26 non-protected trees on the Project Site. Topographically, the Project Site is generally flat. Photographs depicting the current conditions of the Project Site are provided in Figure II-4, Photographs of the Project Site.

SURROUNDING LAND USES

The Project Site is located in an urbanized area within the City of Los Angeles that is characterized by a mix of land uses. Figure II-3, Aerial Photograph of the Project Site and Surrounding Land Uses, identifies the surrounding land uses in the immediate Project Site area and provides their respective use and address. Photographs of the land uses surrounding the Project Site are provided in Figure II-5, Photographs of the Surrounding Land Uses. A description of properties immediately surrounding the Project Site is provided below:

North: To the north of Project Site is a Children's Institute facility and its associated surface parking, located at 1522 E. 102nd Street. The Watts Branch Library is located to the northeast of the Project Site at 10205 S. Compton Avenue. These properties are zoned PF-1 with General Plan land use designations of Public Facilities, similar to the Project Site. 102nd Street bounds these properties to the north. North of E. 102nd Street are single-family homes. The properties further north of the Project Site are zoned R1-1 and have a General Plan land use designation of Low Residential. Refer to Figure II-5, View 7.

South: The Project Site is immediately bordered by 103rd Street to the south. As discussed above, 103rd Street is a two-way street providing one travel lane in each direction and is classified as a Collector Street. On-street parking is provided (with some restrictions) along the north and south sides of 103rd Street, including on-street parking spaces adjacent to the Project Site. Four properties are located to the south of the Project Site and south of E. 103rd Street (refer to Figure II-3, Aerial Photograph of the Project Site and Surrounding land Uses). A detailed description of the properties to the south of the Project Site is provided below:

- The Augustus F. Hawkins Post Office is located at 10301 Compton Avenue at the southwest corner of E. 103rd Street and Compton Avenue. The Post Office is zoned CR-1VL and PF-1 and has General Plan land use designations of General Commercial and Public Facilities. Refer to Figure II-5, View 9.
- The Thomas Riley High School is located at 1524 E. 103rd Street, directly south of the Project Site's fire station. This property is zoned PF-1 and has a General Plan land use designation of Public Facilities, similar to the Proposed Project.
- The Ozie B. Gonzaque Village is located west of Thomas Riley High School at 1515 E. 105th Street. The Ozie B. Gonzaque Village is a 17-acre public housing community operated by the Los Angeles Housing Authority. This community provides single-family homes and apartments that are rented based on income. The Ozie B. Gonzaque Village is zoned R2-1 and PF-1 and has General Plan land use designations of Low Medium I Residential and Public Facilities, respectively. Refer to Figure II-5, View 10.
- A church and single-family residences are located further west of the Ozie B. Gonzaque Village. This single-family neighborhood is zoned R1-1 with general plan land use designations of Low Residential.

East: To the east of the fire station is a Chase Bank located at 10221 S. Compton Avenue on the northwest corner of Compton Avenue and E. 103rd Street. This property is zoned PF-1 with a General Plan land use designation of Public Facilities. Compton Avenue borders this property and the Watts Branch Library to the east. Refer to Figure II-5, View 11. Along the east side of Compton Avenue is the Dr. Martin Luther King Jr. Shopping Center, which contains one-story commercial and retail land uses. These properties are zoned [Q]C2-1 and have a General Plan land use designation of Community Commercial. The Watts Health Center (10300 Compton Avenue) is located on the southeast corner of Compton Avenue and E. 103rd Street. This property is zoned CR-1VL with a General Plan land use designation of Neighborhood Commercial.

West: Success Avenue is located immediately west of the Project Site and is designated as a Local Street in the Mobility Plan. The Ted Watkins Memorial Park is located further west of Success Avenue. This park is approximately 28 acres and features a swimming pool, skate park, walking path, fitness zones and Farmer's Market and offers activities such as baseball, flag football, basketball and soccer all year round. The Ted Watkins Memorial Park is located in the Florence area of the Los Angeles County and is just outside of the City of Los Angeles city limits. Refer to Figure II-5, View 12.



Source: Google Earth, Aerial View, 2016



View 1: From the south side of E. 103rd Street looking north at the former fire station building.



View 2: From the south side of E. 103rd Street looking north at the Watts Counseling and Learning Center.



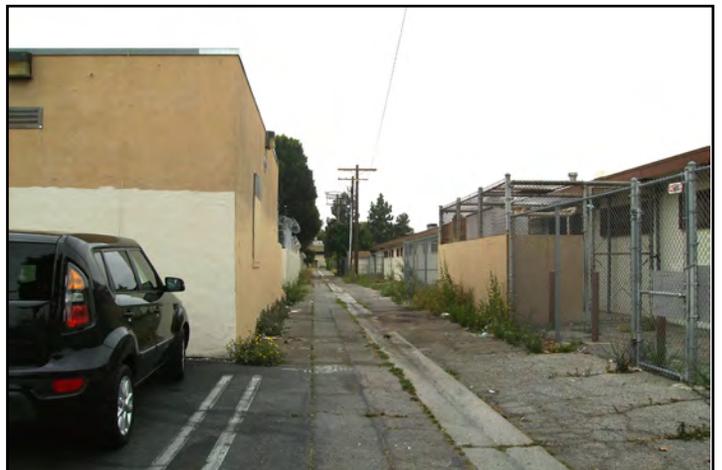
View 3: From the south side of E. 103rd Street looking northeast at the Watts Counseling and Learning Center.



View 4: From the south side of E. 103rd Street looking north at the former library building.



View 5: From the south side of E. 103rd Street looking east at the Project Site.



View 6: From the northeast corner of the Project Site looking west at the rear of the Project Site and adjacent alleyway.

Sources: Parker Environmental Consultants, 2017.



Figure II-4
Photographs of the Project Site
Views 1-6



View 7: From E. 102nd Street looking east at the properties north of the Project Site.



View 8: From the east side of Success Avenue looking east at the surface parking to the northwest of the Project Site.



View 9: From the northeast corner of the Project Site looking southwest at the properties south of the Project Site.



View 10: From the south side of E. 103rd Street looking east the properties south of the Project Site.



View 11: From the southeast corner of E. 103rd Street and Compton Avenue looking northwest at the properties east of the Project Site.



View 12: From the south side of E. 103rd Street looking west at the properties west of the Project Site.

Source: Parker Environmental Consultants, 2017.



Figure II-5
Photographs of the Surrounding Land Uses
Views 7-12

II. PROJECT DESCRIPTION

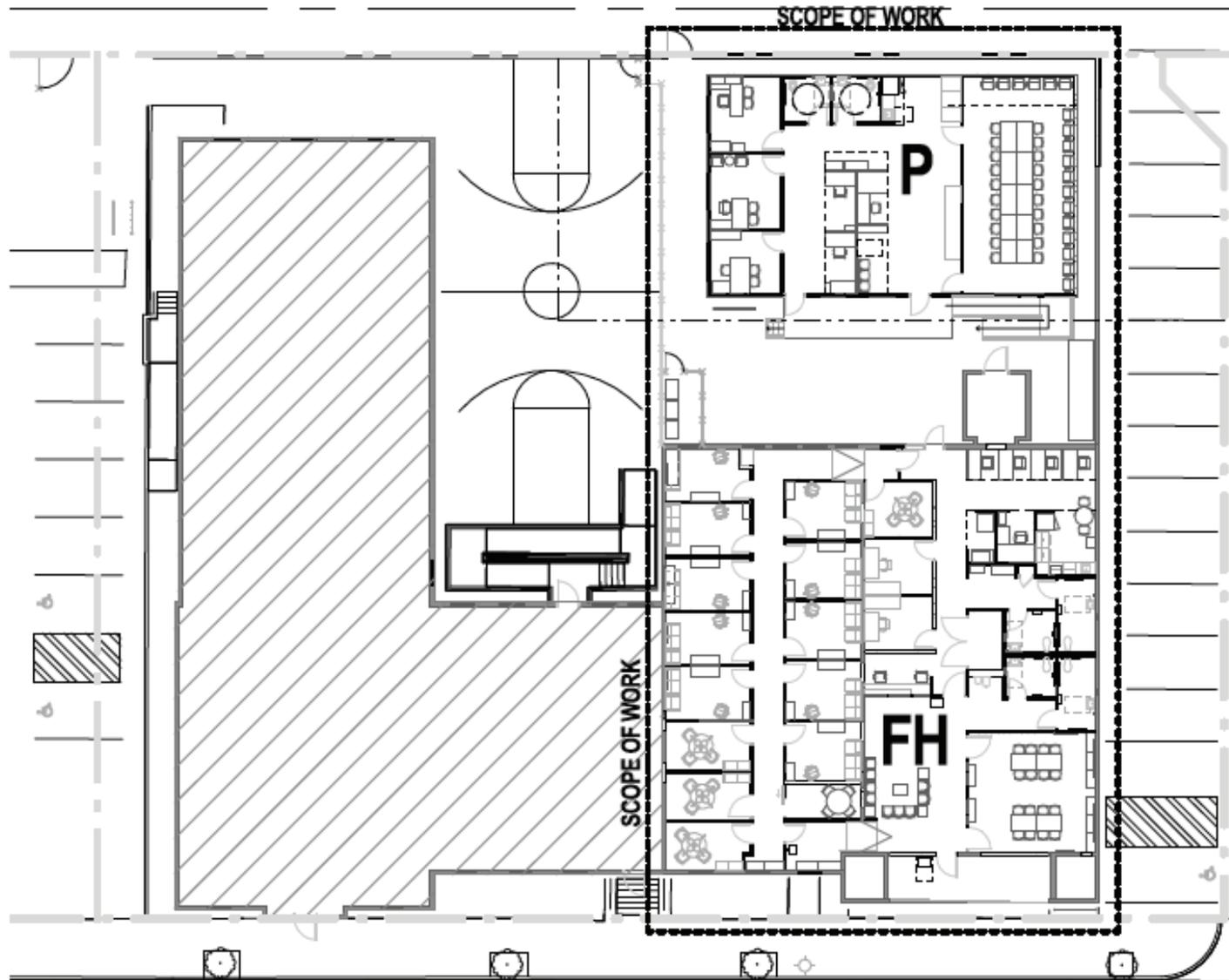
B. PROJECT CHARACTERISTICS

PROPOSED DEVELOPMENT

The Proposed Project includes the interior renovation of the former Fire Station No. 65 space and the redevelopment of the existing Kaiser Permanente Watts Counseling and Learning Center site and adjacent former Watts Library site. Redevelopment of the site would occur in two phases. The first phase would include the temporary relocation of the existing counseling and administrative functions of the Center to a leased portion of the adjacent municipal building, specifically the existing but vacant Fire Station No. 65 building located at 1525 East 103rd Street, while the existing Preschool Education for Parents and Children (PEPC) will be temporarily relocated to the Drew Children’s Development Corporation site during construction of the Proposed Project. Phase 1 would require interior renovations of an existing fire station facility to accommodate the temporary uses by the Center. Phase 2 of the Proposed Project would include the demolition of the existing Watts Counseling and Learning Center and a vacant library building and the construction of a new 60,000 square-foot building with 36,500 square feet of medical office space and 23,500 square feet of counseling and learning center space. Parking would be provided in two levels of parking beneath the new proposed building with 1 ½ levels subterranean and ½ level above grade with up to 230 parking spaces. Table II-2 below shows the proposed development program. The floor plan layout of the firehouse tenant improvement is depicted in Figure II-6. The floor plan and aerial view for the learning center and health pavilion are illustrated in Figure II-7 and Figure II-8, respectively.

**Table II-2
Proposed Development Program**

Land Uses	Floor Area (Square Feet)
Phase I: Fire Station Building Tenant Improvement	
Firehouse Building (to be renovated) ^a	5,046 sf
New Administrative Trailer	2,160 sf
Subtotal New/Renovated Floor Area:	7,206 sf
Civic Center (to remain)	6,919 sf
Total Gross Building Area:	14,125 sf
Phase II: New Learning Center and Health Pavilion	
Medical Offices	36,500 sf
Counseling and Learning Center	23,500 sf
Subtotal New Floor Area:	60,000 sf
Total Gross Building Area:	60,000 sf (1.1:1 FAR)
<i>Notes: sf = square feet</i> <i>^a The firehouse building would be renovated into a counseling center. The adjacent Civic Center offices to the west would remain and is not part of Phase I.</i> <i>Source: gkkworks, November 1, 2017; Turner Construction Perkins + Will, September 22, 2017.</i>	

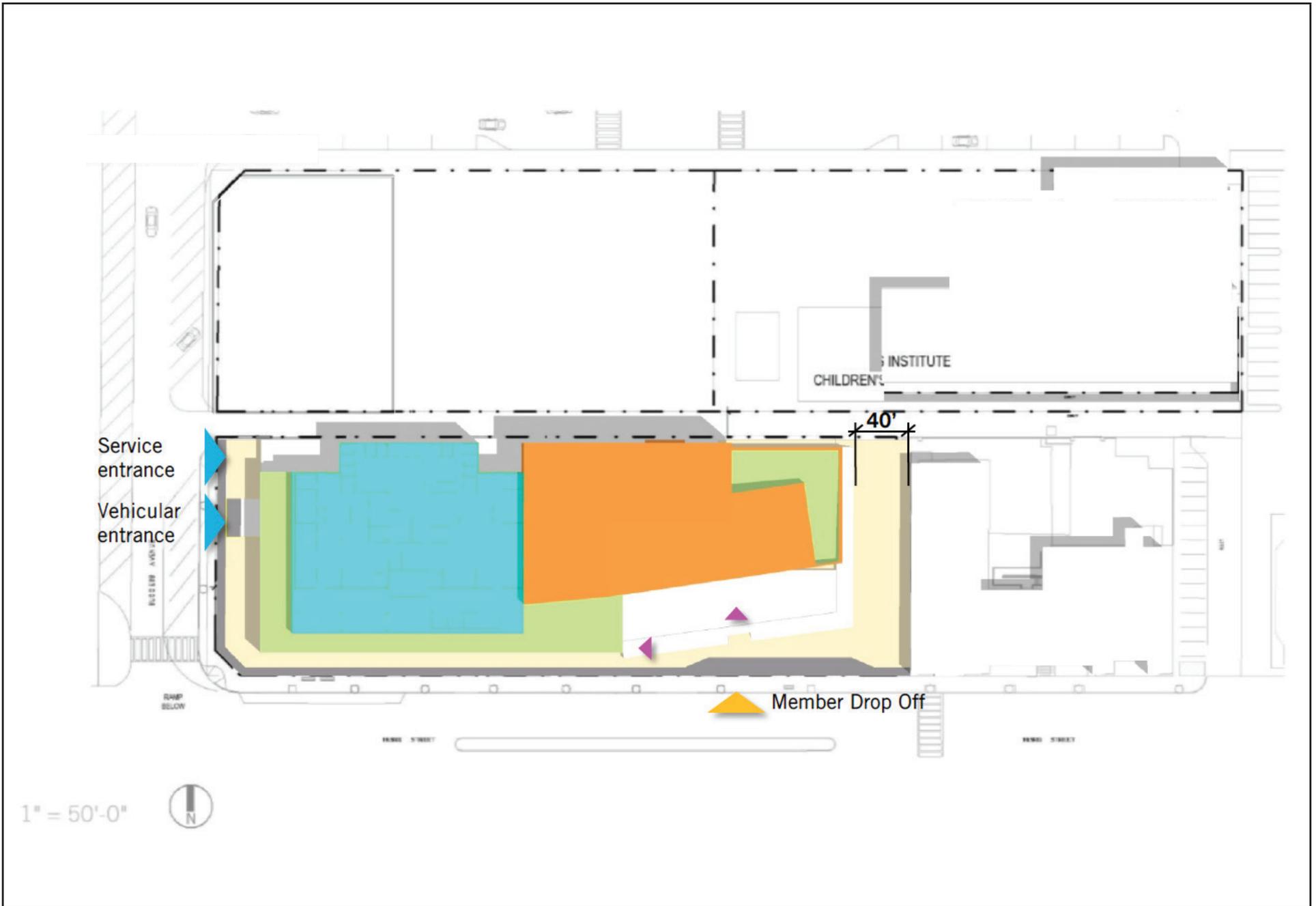


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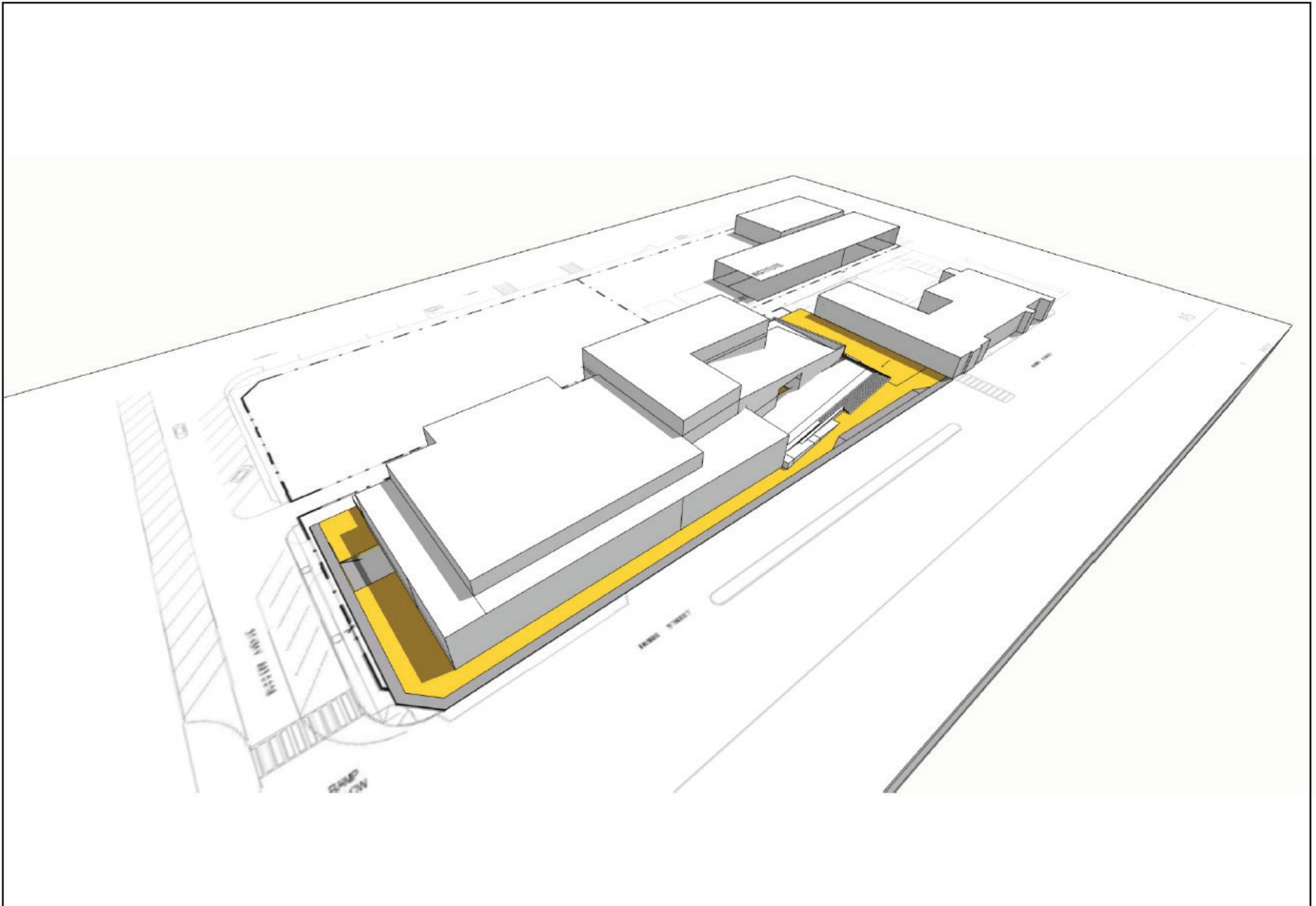
FIREHOUSE MAIN BUILDING
PORTABLE ADMINISTRATION TRAILER



Source: gkkworks, November 1, 2017.



Source: Turner Construction | Perkins+Will, September 22, 2017.



Source: Turner Construction | Perkins+Will, September 22, 2017.



Figure II-8
Aerial View of Learning Center and Health Pavilion from Southwest Corner

Firehouse Building Tenant Improvement

The fire station, formerly Fire Station No. 65, would be renovated and improved with private offices, open workstations, and conference rooms. The renovated building would temporarily serve as a home for Kaiser's Watts Counseling and Learning Center, which has served the local region for more than 50 years. The Proposed Project would demolish the small 954 square-foot ancillary vacant structure located on the northeast corner of the fire station property to accommodate a new 2,160 square-foot administrative trailer with enclosed exterior space. The adjacent Civic Center municipal offices would remain. Following the completion of construction of the New Learning Center and Health Pavilion, the counseling center operations would be relocated to the new building and the temporary lease for the Fire Station would be terminated, and the improved Fire Station space would be returned to the City.

New Learning Center and Health Pavilion

The existing counseling and learning center, vacant library building, and associated parking areas would be demolished to accommodate the redevelopment and expansion of the Watts Counseling and Learning Center operated by Kaiser Permanente. The Proposed Project consists of the construction of a new, 60,000 square-foot building with 36,500 square feet of medical office space and 23,500 square feet of counseling and learning center space. The proposed counseling and learning center space would include the existing PEPC, which is planned to accommodate up to 30 students (eight additional students). The counseling and administrative functions of the existing counseling and learning center would be temporarily relocated to a leased portion of the adjacent existing Fire Station 65 building, while the existing PEPC would be temporarily relocated to the Drew Children's Development Corporation site during construction of the Proposed Project. A new drop-off/pick-up zone is proposed along the north side of 103rd Street. The Project Site would provide an outdoor play area and a public plaza fronting E. 103rd Street as part of the Proposed Project.

FLOOR AREA / HEIGHT

Phase II of the Project Site includes approximately 54,683 square feet of gross lot area (1.26 acres). Per the LAMC, the Project Site's C4-1 zone designation allows a floor area ratio (FAR) of 1.5:1, which allows approximately 82,024 square feet of building area. The Proposed Project's new learning center and health pavilion would provide approximately 60,000 square feet of floor area for an approximate 1.1:1 FAR. The Learning Center and Health Pavilion would consist of 3 ½ levels above grade (½ level of parking and three levels of the new learning center and health pavilion), reaching a maximum height of approximately 50 feet above grade.

PARKING AND ACCESS

All existing driveways for the vacant library building and existing learning center would be removed. Parking for the proposed medical office and learning center building would be provided via a new driveway on the east side of Success Avenue. This driveway would provide access into the subterranean parking garage beneath the building.

The Project Site is located within the Los Angeles State Enterprise Zone (ZI-2374). Pursuant to LAMC Section 12.21.A.4(x)(3), two (2) parking spaces for every one thousand (1,000) square feet need to be provided. As summarized in Table II-3, and discussed in further detail below, the Proposed Project would be consistent with the applicable parking requirements of the LAMC. The new medical office and learning center would be required to provide 120 parking spaces. The development of the new administrative trailer adjacent to the fire station would temporarily require an additional three spaces. The Proposed Project would provide 230 vehicle parking spaces in two parking levels beneath the new proposed building. Thirty-five of the 230 spaces would be allocated by City staff of the adjacent Civic Center/ fire station building. Three spaces for the new administrative trailer would be provided off-site via private lease agreement within 750 feet of the Project Site.

The Proposed Project would also provide the required amount of on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (No. 182,386). Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply six short-term parking spaces and 12 long-term bicycle parking spaces, for a total of 18 parking spaces for the new learning center. The Proposed Project would provide the required bicycle parking stalls within the ground level and subterranean parking garage. For the temporary use of the fire station, the required bicycle parking spaces would also be provided pursuant to the LAMC.

**Table II-3
Summary of Required and Proposed Vehicle Parking Spaces**

Description	Quantity	Parking Required ^a		Parking Provided
		Rate	Spaces	
Commercial				
Administrative Trailer	2,160 sf	2 spaces per 1,000 sf	3	3 ^b
Medical Offices / Learning Center	60,000 sf	2 spaces per 1,000 sf	120	230 ^c
<i>Notes:</i> <i>du = dwelling unit, sf = square feet</i> ^a LAMC 12.21 A.4.(x)(3). Two spaces for each 1,000 square of floor area of combined gross floor area. ^b Although four spaces are required, the Proposed Project would provide 4 on-site bicycle parking stalls in order to reduce one space of the required spaces. ^c These parking spaces would be provided in the subterranean parking garage of the medical office building/learning center. Thirty-five of the 230 provided spaces would be allocated by City staff of the fire station building. Source: Parker Environmental Consultants, 2017.				

CONSTRUCTION

Construction Schedule/Phasing

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 23 months, with final buildout occurring in 2021 for the Learning Center and Health Pavilion. Construction activities associated with the Proposed Project would be undertaken in the

following sequential stages for the new medical office / counseling and learning center: (1) demolition/site clearing, (2) excavation/grading (3) building construction, and (4) architectural finishing.

Fire Station Tenant Improvement

The fire station tenant improvement would occur for approximately five months with operation by early 2019. Since this phase would be limited to interior improvements and installation of a trailer, the construction activities would include hand tools and small equipment during the demolition of the small ancillary structure and renovation of the interior of the fire station. It is anticipated that heavy-duty construction equipment would not be required. The demolition of the detached kitchen and construction debris is estimated to generate approximately eight to ten haul trips.²

New Learning Center and Health Pavilion

Demolition/Site Clearing Phase

This phase would include the demolition of the existing learning center, library, and surface parking lots. In addition, this phase would include the removal of street trees, walls, fences, and associated debris. It is anticipated that the demolition/site clearing phase would necessitate the removal of approximately 15,000 square feet of building debris and 440 cubic yards of asphalt debris. The demolition/site clearing would be completed in approximately two months.

Excavation, Grading and Foundation Phase

After the completion of demolition/site clearing, the excavation phase for the Proposed Project would occur for approximately two months and would involve the cut and fill of land to ensure the proper base and slope for the building foundations. Preparation of the proposed building footings and structural foundation would require the excavation and export of up to 40,500 cy of soil to be hauled off-site in order to build the three level subterranean parking garage. Haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the Department of Building and Safety.

Building Construction Phase

The building construction phase consists of below grade and above grade structures and is expected to occur for approximately 16 months. The building construction phase includes the construction of the proposed building and subterranean parking levels, connection of utilities to the building, building foundations, basement walls, parking structure, laying irrigation for landscaping, and landscaping the Project Site.

² *The renovation of the Fire Station is estimated to generate 77 tons of construction and demolition debris. Based on conversion of 2,400 lbs per cubic yard, the fire station improvement would generate approximately 64 cubic yards of waste.*

Finishing/Architectural Coating Phase

The finishing/architectural coating phase is expected to occur over approximately three months. During this phase, interior cabinets and lighting fixtures would be installed, interior and exterior wall finishing's and paint would be applied, and the installation of windows, doors, cabinetry, and appliances.

Temporary Right-of-Way Encroachment

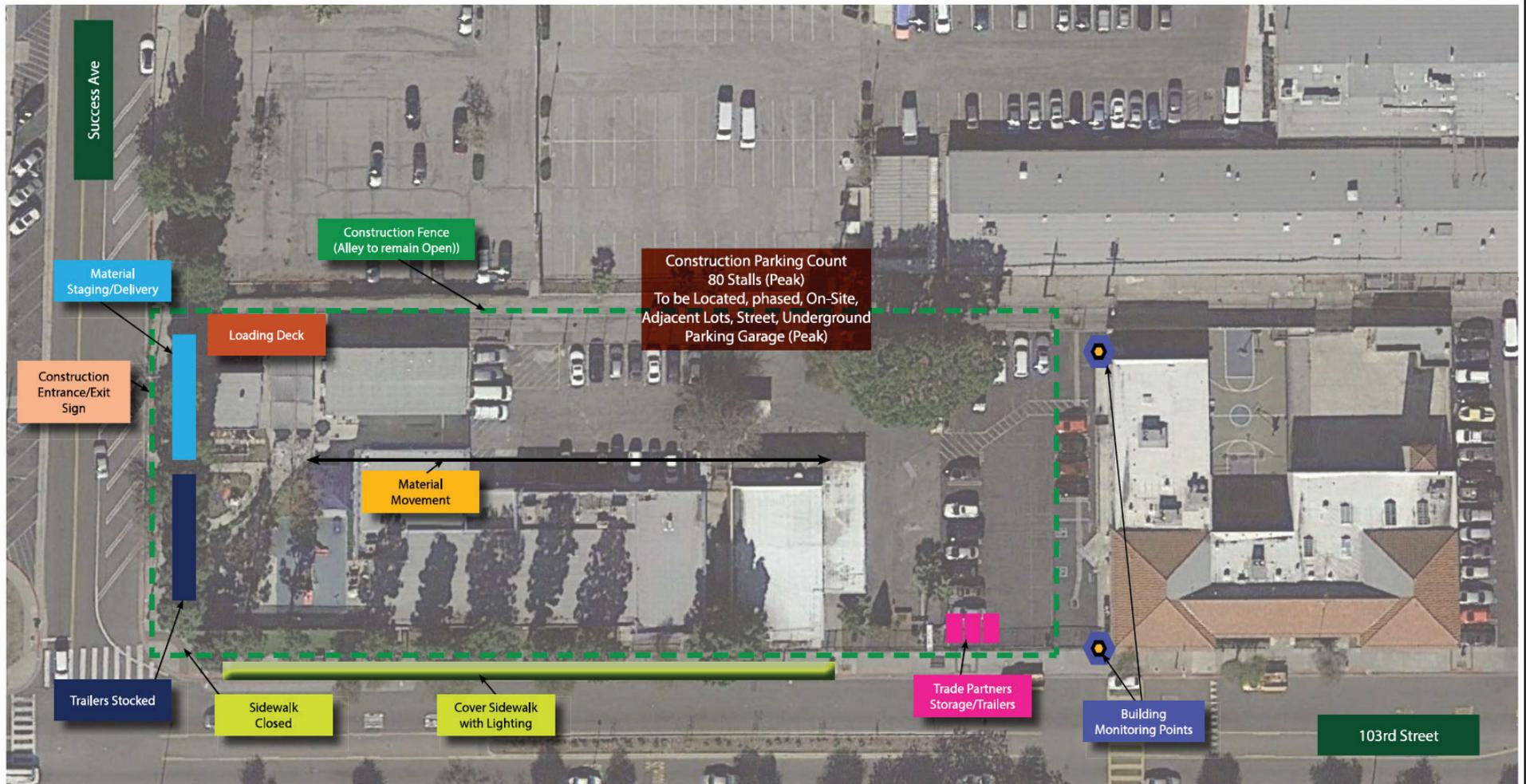
Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on-site for the duration of construction activities. Traffic lane and right-of-way closures, if required, would be properly permitted by the City agencies and would conform to City standards.

As discussed further in Section XVI. Transportation and Traffic (See Mitigation Measure T-1 and T-2) the Proposed Project would require a Construction Management Plan, which shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties, and if applicable, the location of off-site staging areas for haul trucks and construction vehicles. All construction related traffic shall be restricted to off-peak hours. With respect to pedestrian access in the project area during construction of the Proposed Project, implementation of Mitigation Measure T-3 would ensure adequate and safe pedestrian circulation during construction. The Construction Site Logistics Plan is illustrated in Figure II-9, below.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. The Department of City Planning further restricts the hours of construction in residential areas to 6:00 P.M. on weekdays. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Haul Route

For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve trucks with applicable hauling capacity. All truck staging would either occur on-site or at designated off-site locations and radioed into the Project Site to be filled. All construction and demolition debris would be recycled, but demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon Landfill, which accepts



Source: Turner Construction Company, 2017.

construction and demolition debris and inert waste from areas within the City of Los Angeles. The Sunshine Canyon Landfill is approximately 37 miles north of the Project Site (approx. 74 miles round trip). For recycling efforts, California Waste Services, located at 621 W. 152nd Street, accepts construction waste for recycling and is located approximately 6 miles south from the Project Site (approx. 12 miles round trip). All on-site soil export would be dropped off at a deposit site to be determined by the City.

Traveling to and from the deposit sites would utilize 103rd Street, Wilmington Avenue, the Imperial Highway ramp to the 105 Freeway (when traveling westbound), and the Wilmington Avenue ramp to the 105 Freeway (when traveling eastbound). The haul route specified above may be modified in compliance with applicable City policies, provided DOT and/or Street Services approves any such modification.

RELATED PROJECTS

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

“(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.

(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular

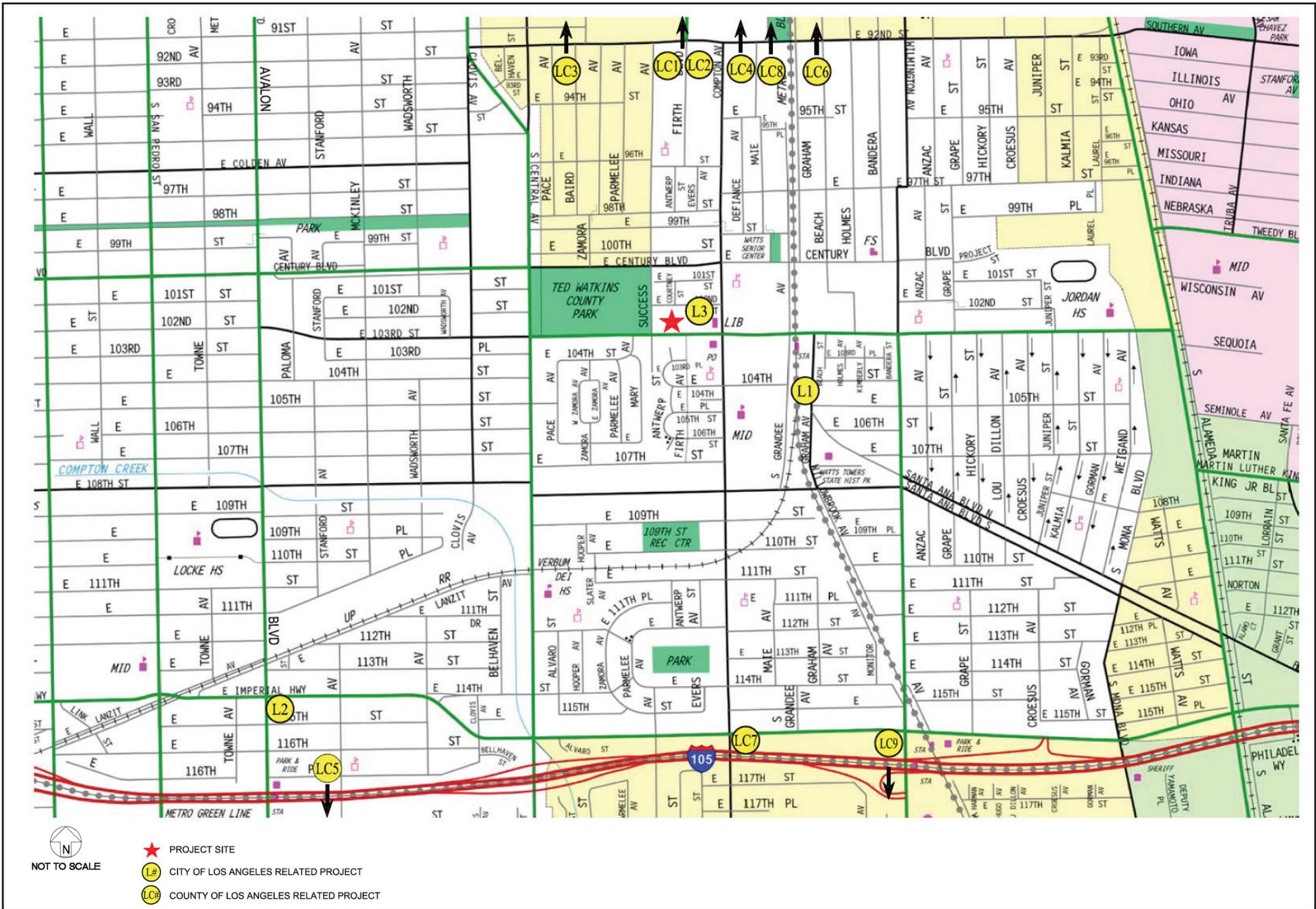
requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B).) The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation. The related projects identified are included in Table II-4, Related Projects List, below. A total of 12 related projects were identified within the affected Project area. Three of the related projects are located within the City of Los Angeles, and nine of the related projects are located within the County of Los Angeles. An analysis of the cumulative impacts associated with these related projects and the Proposed Project are provided under each individual environmental impact category in Section III of this IS/MND. The locations of the related projects are shown in Figure II-10, Related Projects Location Map.

**Table II-4
Related Projects List**

#	Project Name	Location/Address	Project Description	Number	Units
City of Los Angeles					
L1	Wattstar Theater	10341 Graham Avenue	Theater Education Center	1,000 12,417	seats sf
L2	7-Eleven	600 E. Imperial Highway	Convenience Market	2,600	sf
L3	Children's Institute, Inc.	1522 E. 102 nd Street	Education Center	50,000	sf
County of Los Angeles					
LC1	--	8301-8307 Compton Avenue	Retail/Laundry	5,539	sf
LC2	--	8272 Compton Avenue	Laundromat	5,366	sf
LC3	--	1200 Nadeau Street	Retail	6,466	sf
LC4	--	1600-1622 E. Florence Avenue	Senior Housing Community Room/Gym Library	117 2,430 10,000	du sf sf
LC5	Earvin Magic Johnson Park Master Plan	905 E. El Segundo Boulevard	Outdoor Stadium Athletic Fields Indoor Gym Equestrian Center Amphitheater Community Center Aquatics Center South Agency Headquarters Other Park Amenities	3,000 3 21,000 105 1,500 20,000 25,400 120 94.5	seat fields sf stables seats sf sf emp acres
LC6	Green Dot Charter Middle School	8145-8205 Beach Street	Middle School	650	stu
LC7	R2015-0102	1606 Imperial Highway	Office	1,224	sf
LC8	--	1600-1616 E. Florence Avenue	Senior Apartments Library	117 10,000	du sf
LC9	R2014-01830	11737 Wilmington Avenue, 11732-11756 Bandera Avenue	Library Senior Apartments	8,939 105	sf du
<p><i>Notes: du = dwelling unit, sf = square feet, emp = employee, stu = student</i> <i>Source: Linscott, Law & Greenspan Engineers, Traffic Impact Study, Kaiser Permanente Watts Learning Center and Health Pavilion Project, August 2, 2017.</i></p>					



Source: Linscott, Law & Greenspan, Engineers, August 2017.



Figure II-10
Related Projects Location Map

II. PROJECT DESCRIPTION

C. ENTITLEMENT REQUESTS

The Applicant, Kaiser Foundation Health Plan, Inc., is seeking approval of the following entitlement requests:

Fire Station Tenant Improvement:

1. Pursuant To Los Angeles Municipal Code Section 12.27,
 - i. A Variance from LAMC Sections 12.04.09 B and 12.23 B.7 (A), to allow the change in use of a leased space within an existing building in the Public Facility Zone to a privately operated community services center on a temporary basis.
 - ii. A Variance from LAMC 12.26.E.5 to allow for off-site parking within 750 feet of the Project Site by lease agreement in lieu of a recorded covenant.

Learning Center and Health Pavilion:

1. Approval of Conditional Use Permit (CUP) for a Commercial Corner Development;
2. A General Plan Amendment and Zone Change for the library parcel from Public Facility (PF-1) to Commercial (C4-1) to accommodate the new Watts Counseling and Learning Center and medical office space; and
3. A Site Plan Review to allow new construction of over 50,000 sf of non-residential floor area.

Pursuant to various sections of the Los Angeles Municipal Code, the Applicant will request approvals and permits from the Department of Building and Safety (and other municipal agencies) for Project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route (for the export of approximately 40,500 cy of soil), removal of existing street trees, and building and tenant improvements.

III. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study addresses the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, C.C.R. Title 14, Chapter 3, § 15000-15387). The analytical methodology and thresholds of significance are based on the City of Los Angeles' *L.A. CEQA Thresholds Guide (2006)* unless otherwise noted.

ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

No Impact. The *L.A. CEQA Thresholds Guide* provide that a significant impact may occur if the Proposed Project includes a proposal to develop or allow development in an existing natural open space area, or has the potential to introduce features that would block or detract from the existing valued aesthetic quality of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

The Proposed Project would not block or detract from the existing valued aesthetic quality of a scenic vista. The design and construction of the Proposed Project would be consistent with the LAMC policies and City design guidelines that apply to the Project Site. The western portion of the Project Site currently contains a one-story vacant library and a single-story counseling and learning center. The Proposed Project would demolish the existing buildings and construct a 3 ½ story building with medical offices and a counseling and learning center with a maximum height of 50 feet above grade. Therefore, the Proposed Project's views would be similar to the existing views along 103rd Street. Additionally, the single-story fire station building would be limited to interior renovation and would maintain its exterior facades and building height (25 feet above grade). The back-of-house storage room would be demolished and replaced with a one-story trailer reaching approximately 16 feet above grade. The Proposed Project would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhood. The Project Site is surrounded by institutional, commercial, civic, and residential uses ranging from one- to two-stories above grade. Views in the vicinity of the Project Site are largely constrained by adjacent structures and the area's relatively flat topography. No scenic views are provided from or through the Project Site. The Project Site is an infill lot within a developed area of Southeast Los Angeles Community Plan area in the City of Los Angeles and does not possess any unique aesthetic characteristics. Further, the Project Site is not located within or along a designated scenic corridor and no scenic views exist from or through the Project Site. Therefore, development of the Proposed Project would not have an impact on a scenic vista, and no impact would occur.

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

Less Than Significant Impact. The *L.A. CEQA Thresholds Guide* provides that a significant impact may occur if scenic resources would be damaged and/or removed by development of a project within a City designated scenic highway. The Project Site is located on 103rd Street, which is designated by the Mobility Plan 2035 as a Collector Street in the vicinity of the Project Site. 103rd Street is not a City designated scenic highway. Nevertheless, the on-site former fire station, known as Engine Company 65, is determined to be eligible for historic listing in the National and California Registers and as a Los Angeles Historic-Cultural Monument.¹ The Proposed Project would consist of interior renovations of the former fire station building. Any alterations to the existing building would be done in conformance with the Secretary of Interiors Standards for the Rehabilitation of Historic Buildings. Therefore, the Proposed Project would not alter setbacks, facades, or exterior character defining architectural features. As discussed in more detail in Section V. Cultural Resources, the Proposed Project would retain the historic character of the building and impacts upon Fire Station No. 65's historic designation would be less than significant. Consequently, the Proposed Project would not damage and/or remove any scenic resources within a State or City designated scenic highway, and impacts would be less than significant.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. The *L.A. CEQA Thresholds Guide* provide that a significant impact may occur if the Proposed Project were to introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines. The Proposed Project would be required to comply with all applicable building code requirements. Pursuant to Municipal Code Section 91.8104, every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material. Pursuant to Municipal Code Section 91.8104.15, the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley. With respect to signage, the Proposed Project shall comply with the Los Angeles Municipal Code Section 91.6205, including on-site signage maximums and multiple temporary sign restrictions, as applicable. Additionally, the Proposed Project shall comply with the Los Angeles Municipal Code Section 91.6205, including but not limited to the following provisions: (1) The Applicant shall affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS."; (2) Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier; and (3) The Applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence. Thus, with adherence to the following regulatory code compliance measures, impacts related

¹ *SurveyLA Findings and Reports, Southeast Los Angeles Individual Resources*, pg. 13. March 2012. Website: <http://preservation.lacity.org/files/SELAAppendixAFinal3-12.pdf>, accessed May 2017.

to the general aesthetic appearance, upkeep, and character of the Project Site would be less than significant.

Building Height and Massing

The Proposed Project includes the renovation of an existing fire station and the demolition of the existing vacant library and learning center on site for the construction of a new 60,000 square-foot building with 36,500 medical office space and 23,500 square feet of counseling and learning center space. The Proposed Project would be up to 3 ½ stories high (½ level of above grade parking podium and 3 levels of office/learning center space) with 1 ½ levels of parking below grade. The building's maximum height would reach 50 feet above grade. With respect to building mass and height, the surrounding neighborhood is characterized by a mix of low-rise institutional, commercial/retail, civic, and residential uses. As shown in Figure II-5 of the Project Description, Properties located around the Project Site range from one to two stories above grade. The Proposed Project's proposed height would be consistent with the surrounding area. The Proposed Project's impacts with respect to building height and massing would therefore be less than significant.

Shade/Shadow

Building shadow is a general condition of the urbanized environment, and is considered an aesthetic issue by the City of Los Angeles, which has established shadow impact standards. In accordance with the *L.A. CEQA Thresholds Guide*, "facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors." These land uses are termed "shadow-sensitive" because sunlight is important to function, physical comfort of commerce. Pursuant to the *L.A. CEQA Thresholds Guide*, a shading impact would normally be considered significant if the Proposed Project's structures cast shadows on a shadow sensitive land use for more than three hours each day between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time between early April and late October.

The Proposed Project's new counseling and learning center proposes up to 3 ½ stories above grade. The proposed trailer adjacent to the fire station would be one-story and approximately 16 feet above grade. Pursuant to the *L.A. CEQA Thresholds Guide*, detailed shade and shadow analysis is warranted if a proposed structure is over 60 feet in height and is located within the vicinity of shadow sensitive land uses. Because the height of the proposed structures would be well below 60 feet, the shade and shadow impacts of the Proposed Project would be minimal. As a result of the relatively short shadow lengths, and the orientation and setbacks of structure and yards within each developed lot, no shade sensitive land uses would be adversely impacted by the Proposed Project's projected shadow patterns to the immediate north, east, south, or west of the Project Site. Therefore, with respect to shade/shadow, a less than significant impact would occur.

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

Less Than Significant Impact. The *L.A. CEQA Thresholds Guide* provide that a significant impact may occur if the Proposed Project introduces new sources of light or glare on or from the Project Site which would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the Proposed Project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of Proposed Project sources; and (b) the extent to which Proposed Project lighting would spill off the Project Site and affect adjacent light-sensitive areas.

Lighting

Lighting for the Proposed Project would be provided in order to illuminate the building entrances, outdoor play area, public plaza, and parking areas, largely to provide adequate night visibility for visitors and to provide a measure of security. All outdoor lighting would be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way. The Proposed Project's lighting fixtures would be installed and operated in accordance with Section 99.05.106.8 (Light Pollution Reduction) of the City of Los Angeles Green Building Code, which requires outdoor lighting systems to be designed and installed to comply with the minimum requirements in the California Energy Code, or comply with a local ordinance, whichever is more stringent. A moderate degree of illumination already exists in the Project vicinity in the form of streetlights, building lighting, and car headlights along 103rd Street, Compton Avenue, and Success Avenue. Thus, with code compliance, the Proposed Project would not generate a substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses. Vehicular access for the subterranean parking garage would be provided along the east side of Success Avenue. The property to the west of the Project Site across Success Avenue includes the Ted Watkins Memorial Park. Headlights from vehicles entering or exiting the proposed driveways would not adversely impact surrounding land use, since the park closes at sunset.² Additionally, it is anticipated that the Proposed Project's office uses and counseling and learning center would be operational during the daytime hours only. The Proposed Project would not introduce any new sources of substantial light that are incompatible with the surrounding areas. Therefore, the Proposed Project's impacts would be less than significant.

Glare

Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Proposed Project's

² County of Los Angeles, Department of Parks and Recreation, *Ted Watkins Memorial Park*, http://parks.lacounty.gov/wps/portal/dpr/Parks/Ted_Watkins_Memorial_Park, accessed July 2017.

architectural materials and landscaping would prevent unnecessary glare. The exterior of the proposed structure would be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat. The landscaped courtyards and green areas would serve to reduce heat gain and reflective glare potential. The Proposed Project's building height proposes a maximum height of 3 ½ stories. Thus, the Proposed Project is located in a highly urbanized and developed area, and would not introduce any new substantial sources of glare that are incompatible with the surrounding areas. Therefore, the Proposed Project's impacts with respect to light and glare would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 12 related projects would result in an intensification of existing prevailing land uses in the Project Site area. Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, some related projects would be subject to site plan review by the City of Los Angeles Department of City Planning or the County of Los Angeles Department of Regional Planning (whichever is applicable) for review and approval. The site plan review process would ensure each project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. Therefore, cumulative aesthetic impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. The Project Site is located within a highly developed area of Southeast Los Angeles Community Plan area in the City of Los Angeles. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the "Los Angeles County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.³ Therefore, no impact to agricultural lands would occur.

³ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed November 2017.*

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

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC). The Project Site is currently zoned PF-1 with the General Plan land use designation of Public Facilities and C4-1 with a General Plan land use designation of Community Commercial. The Project Site is not zoned for agricultural production, and no farmland activities exist on-site. In addition, no Williamson Act Contracts are in effect for the Project Site.⁴ Therefore, no impact would occur.

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

No Impact. The Project Site is zoned PF-1 which has a General Plan land use designation of Public Facilities and C4-1 with a General Plan land use designation of Community Commercial in the Southeast Los Angeles Community Plan area. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

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

No Impact. The Project Site is fully developed and currently contains two vacant municipal buildings owned by the Watts Civic Center and a counseling and learning center owned by Kaiser Permanente. The Project Site is located in a highly developed area of the City of Los Angeles. The Project Site is limited to some ornamental trees and shrubs on site and along the public right-of-way of 103rd Street. No forested lands or protected vegetation exist on or in the vicinity of the Project Site. Therefore, no impact would occur.

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 to non-forest use?

No Impact. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any “Farmland” category designated by the State of California. According to the “Los Angeles County Important Farmland 2016” map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the

⁴ California Department of Conservation, *State of California Williamson Act Contract Land Map 2015-2016*, website: <http://www.conservation.ca.gov/dlrp/lca>, accessed March 2017.

soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.⁵ Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the Proposed Project in combination with the 12 related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2016 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.⁶ The Project Site is located in an urbanized area in the Southeast Los Angeles Community within the City of Los Angeles and does not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

III. AIR QUALITY

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

Less Than Significant Impact. A significant air quality impact could occur if the Proposed Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District (SCAQMD) on March 3, 2017 (“2016 AQMP”). The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gasses and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy. In addition, the Southern California Association of Governments (SCAG) recently approved their 2016 RTP/SCS that include transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the 2016 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and SIP for the South Coast Air Basin, are based on SCAG’s 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). For purposes of assessing a project’s consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered

⁵ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed November 2017.*

⁶ *Ibid.*

consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP.

As discussed in Question XIII(a), Population and Housing, the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2016 RTP/SCS to increase housing density within close proximity to High-Quality Transit Areas (HQTA). An HQTA is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project Site is located in an urbanized community approximately 11 miles south of Downtown Los Angeles, which is part of the regional transit network in the Los Angeles area. The Proposed Project would concentrate new development and jobs within half a mile (walking distance) from the 103rd Street/Watts Towers Station and numerous bus routes with peak commute service intervals of 15 minutes or less. Thus, the Project's location provides opportunities for employees and visitors to use public transit to reduce vehicle trips. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency and the Metropolitan Transportation Commission have also found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption. The Proposed Project's close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. Thus, because the Proposed Project would be consistent with the employment growth projections and regional land use planning policies of the 2016 RTP/SCS (discussed in Section XIII. Population and Housing), the Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP, and Proposed Project impacts would be less than significant.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.

Construction Emissions

The fire station tenant improvement would occur for approximately five months with operation by early 2019. Since this phase would be limited to interior improvements and construction of a trailer, the construction activities would include hand tools and small equipment during the demolition and renovation. It is anticipated that heavy-duty diesel-powered construction equipment would not be required. The demolition of the detached kitchen and construction debris is estimated to generate approximately eight to ten haul trips based on a haul truck capacity of 16 cubic yards.⁷ Air pollution

⁷ *The renovation of the Fire Station is estimated to generate 77 tons of construction and demolition debris. Based on conversion of 2,400 lbs per cubic yard, the fire station improvement would generate approximately 64 cubic yards of waste.*

emissions from the fire tenant improvement would be temporary and minimal and would not require the use of any heavy duty diesel fueled equipment beyond highway operated delivery and haul trucks.

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 23 months, with a final buildout year in 2021 for the medical office/counseling and learning center. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in the following sequential stages: (1) demolition/site clearing, (2) excavation/grading (3) building construction, and (4) architectural finishing. The construction phase includes demolishing the existing structures, the construction of the proposed counseling and learning center, connection of utilities to the building, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate PM_{2.5} and PM₁₀ emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

For purposes of this analysis, the following regulatory compliance measures have been identified as being applicable to the Proposed Project's construction activities:

- **Site Clearing, Grading and Construction Activities:** Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
 - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
 - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
 - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
 - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
 - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
 - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
 - Trucks having no current hauling activity shall not idle but be turned off.
- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

As required by CEQA, the Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*) as recommended by the SCAQMD. Table III-1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project construction. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required and regulated by SCAQMD.

**Table III-1
Estimated Peak Daily Construction Emissions**

Emission Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition/Site Clearing						
On-Site Fugitive Dust	--	--	--	--	0.15	0.02
On-Site Off-Road (Diesel Equipment)	2.30	22.68	14.89	0.02	1.29	1.20
Off Site (Hauling, Vendor, Worker)	0.09	0.66	0.65	<0.01	0.19	0.05
Total Emissions	2.39	23.34	15.54	0.02	1.63	1.27
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Grading/Excavation						
On-Site Fugitive Dust	--	--	--	--	2.77	1.50
On-Site Off-Road (Diesel Equipment)	2.38	26.36	14.95	0.03	1.21	1.12
Off Site (Hauling, Vendor, Worker)	1.40	45.37	9.97	0.13	3.35	1.04
Total Emissions	3.78	71.73	24.92	0.16	7.33	3.66
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Building Construction						
On-Site Off-Road Diesel Equipment	3.59	26.44	24.67	0.04	1.54	1.51
Off Site (Hauling, Vendor, Worker)	0.41	3.08	3.12	0.01	0.83	0.24
Total Emissions	4.00	29.52	27.79	0.05	2.37	1.75
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Architectural Coating						
On-Site Architectural Coating	8.95	--	--	--	--	--
On-Site Off-Road Diesel Equipment	1.05	8.02	9.51	0.02	0.47	0.47
Off-Site Hauling/Vendor/Worker Trips	0.06	0.04	0.44	<0.01	0.14	0.04
Total Emissions	10.06	8.06	9.95	0.02	0.61	0.51
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. Calculation sheets are provided in Appendix A to this IS/MND.</i>						

As shown in Table III-1, above, construction-related daily emissions associated with the Proposed Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, construction impacts are considered to be less than significant.

Operational Emissions

Air pollutant emissions are currently generated at the Project Site by the existing Watts Counseling and Learning Center. These uses generate air pollutant emissions from stationary sources, such as space and water heating, architectural coatings (paint), and mobile vehicle traffic traveling to and from the Project Site. The average daily emissions generated by the existing uses at the Project Site have been estimated utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*) recommended by the SCAQMD. As shown in Table III-2, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site.

Table III-2
Existing Daily Operational Emissions from the Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summertime (Smog Season) Emissions						
Area	0.24	<0.01	<0.01	0.00	<0.01	<0.01
Energy	<0.01	0.03	0.02	<0.01	<0.01	<0.01
Mobile Sources	0.20	0.75	1.81	<0.01	0.30	0.09
Total Emissions	0.44	0.78	1.83	<0.01	0.30	0.09
Wintertime (Non-Smog Season) Emissions						
Area	0.24	<0.01	<0.01	0.00	<0.01	<0.01
Energy	<0.01	0.03	0.02	<0.01	<0.01	<0.01
Mobile Sources	0.19	0.76	1.78	<0.01	0.30	0.09
Total Emissions	0.43	0.79	1.80	<0.01	0.30	0.09
<i>Note: Calculation worksheets are provided in Appendix A to this IS/MND.</i>						

The Proposed Project would result in the interior renovation of the fire station and the demolition of the existing library and counseling and learning center for the development and operation of a new building medical office space and an expansion of the Watts Counseling and Learning Center. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod (*Version 2016.3.2*) recommended by the SCAQMD. The results of these calculations are presented in Table III-3, Proposed Project Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

**Table III-3
Proposed Project Estimated Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summertime (Smog Season) Emissions						
Area	1.38	<0.01	0.03	0.00	<0.01	<0.01
Energy	0.02	0.17	0.14	<0.01	0.01	0.01
Mobile Sources	2.94	14.20	34.50	0.12	9.56	2.62
Total Project Emissions	4.34	14.37	34.67	0.12	9.57	2.63
<i>Less Existing Project Site Emissions</i>	<i>-0.44</i>	<i>-0.78</i>	<i>-1.83</i>	<i>-(<0.01)</i>	<i>-0.30</i>	<i>-0.09</i>
NET Project Emissions	3.90	13.59	32.84	0.12	9.27	2.54
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area	1.38	<0.01	0.03	0.00	<0.01	<0.01
Energy	0.02	0.17	0.14	<0.01	0.01	0.01
Mobile Sources	2.79	14.41	32.72	0.11	9.56	2.62
Total Project Emissions	4.19	14.58	32.89	0.11	9.57	2.63
<i>Less Existing Project Site Emissions</i>	<i>-0.43</i>	<i>-0.79</i>	<i>-1.80</i>	<i>-(<0.01)</i>	<i>-0.30</i>	<i>-0.09</i>
NET Project Emissions	3.76	13.79	31.09	0.11	9.27	2.54
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	No	No	No	No	No	No
<i>Note: Calculation worksheets are provided in Appendix A to this IS/MND.</i>						

- c) **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?**

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in State non-attainment for ozone, PM₁₀ and PM_{2.5}, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. In regards to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor

provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As discussed under Question III(b) above, the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. Therefore, the Proposed Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in non-attainment, and impacts would be less than significant.

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

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.⁸

Localized Significance Thresholds

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,⁹ apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA. For PM₁₀, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For PM_{2.5}, the LSTs were derived based on a general ratio of PM_{2.5} to PM₁₀ for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 source receptor areas (SRA) at various distances from the source of emissions. The Project Site is located within SRA 12, which covers the South Central Los

⁸ *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.*

⁹ *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

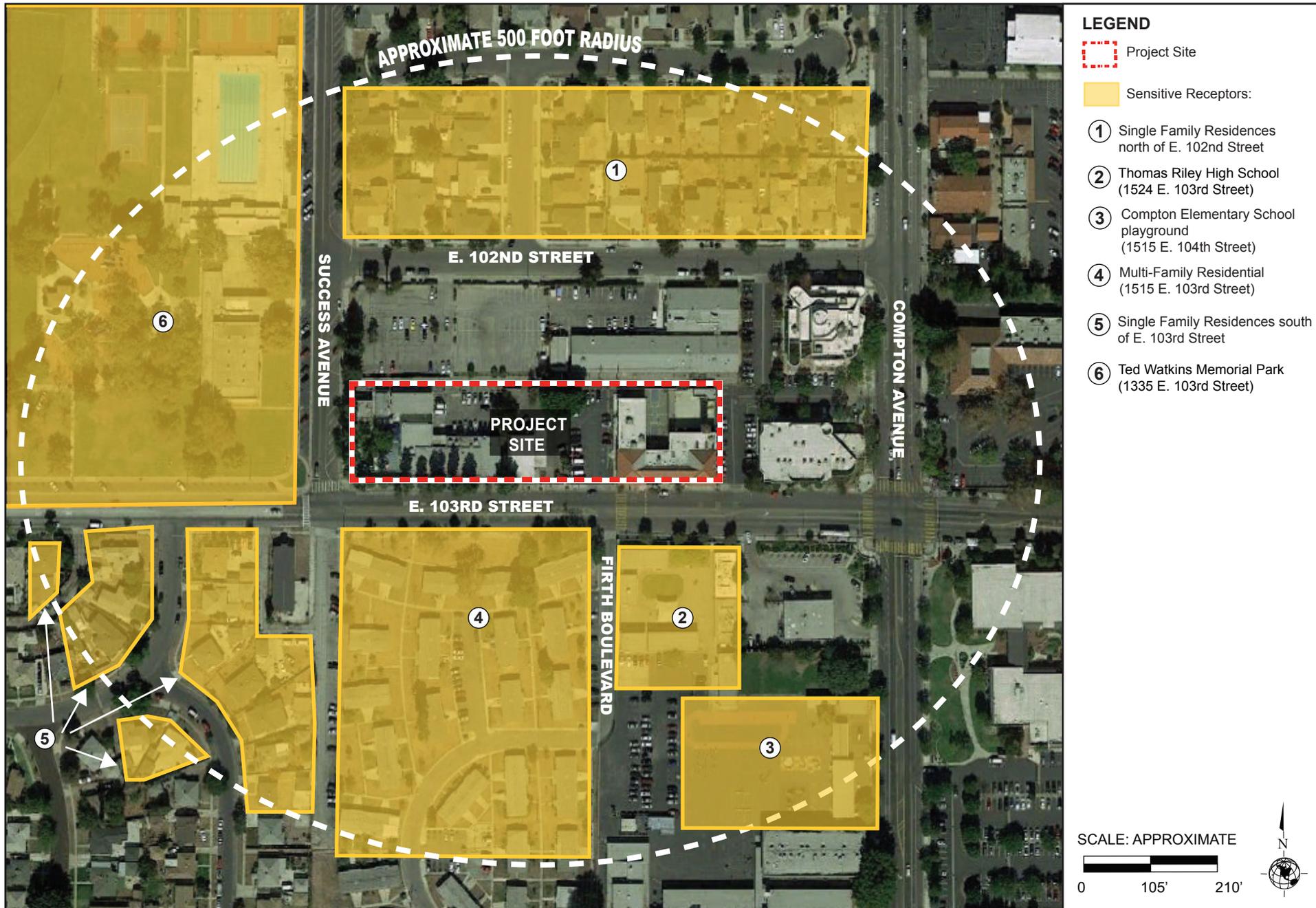
Angeles County area. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project include a park, schools, single-family residential, and multi-family residential neighborhoods. Figure III-1, Air Quality Sensitive Receptors, identifies the surrounding sensitive receptors within 500 feet of the Project Site. Given the proximity of these sensitive receptors to the Project Site, the LSTs with receptors located within 25 meters (82 feet) are used to address the potential localized air quality impacts associated with the construction-related NO_x , CO, PM_{10} , and $\text{PM}_{2.5}$ emissions for each construction phase.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations especially during the demolition and grading phases. However, as shown in Table III-4, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate one-acre site in SRA 12. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

**Table III-4
Localized On-Site Peak Daily Construction Emissions**

Construction Phase ^a	Total On-site Emissions (Pounds per Day)			
	NO_x ^b	CO	PM_{10}	$\text{PM}_{2.5}$
Learning Center and Health Pavilion:				
Demolition/Site Clearing	22.68	14.89	1.44	1.22
Grading/Excavation	26.36	14.95	3.98	2.62
Building Construction	26.44	24.67	1.54	1.51
Architectural Coatings	8.02	9.51	0.47	0.47
SCAQMD Localized Thresholds ^c	46	231	4	3
Potentially Significant Impact?	No	No	No	No
^a The localized thresholds for all phases are based on a receptor distance of 82 feet in SCAQMD's SRA 12 for a Project Site of one acre. ^b The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2 , and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects. ^c SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009, and Sample Construction Scenarios for Projects Less than Five Acres in Size, Appendix K. Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.				



Source: Google Earth, Aerial View, 2016

Localized Operational Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate high levels of localized carbon monoxide (CO). Because the Basin is currently in attainment and existing congested intersections do not exceed state thresholds, CO hotspots are less than significant under extreme conditions. Therefore, no further analysis for CO hotspots is warranted and localized operational emissions would be less than significant.

Toxic Air Contaminants (TAC)

Construction Emissions

The Proposed Project's construction activities would generate toxic air contaminants in the form of diesel particulate emissions associated with the use of heavy trucks and construction equipment. The SCAQMD has not published guidance directly related to quantitatively assessing health risk impacts associated with construction activities. The dose to which receptors are exposed is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substances. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. Thus, the risks estimated for a maximally exposed individual are higher when exposure occurs over a long duration. For example, according to the Office of Environmental Health Hazard Assessment, estimating the cancer risk from toxic air contaminants should be based on a lifetime (i.e., 70-year) exposure period. The construction period would occur over an approximately 23-month period. Therefore, it is not meaningful to evaluate long-term cancer impacts from construction activities that occur on an intermittent basis (i.e., 5 days a week during permissible hours of construction) over a relatively short duration. Additionally, not all phases of construction would emit the same level of emissions. The most intensive diesel emissions would occur during the excavation phase, which is expected to occur over approximately three months. The Proposed Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location. In addition, as discussed above, the Proposed Project would not result in a localized significant impact. Therefore, the Proposed Project would result in a less than significant impact related to construction TACs.

Operational Emissions

The Proposed Project would consist of medical office space and a counseling and learning center. These uses would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such, no significant toxic airborne emissions would result from Proposed Project implementation. In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Garbage collection areas for the Project Site would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations phase. Further, the Proposed Project would be required to install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138 to control odors from any operational activities within the proposed commercial uses. With compliance with SCAQMD Rules 402 and 1138, described above, potential objectionable odor impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects in the Project Site vicinity would result in an increase in construction and operational emissions in the already urbanized area of the City of Los Angeles.

Cumulative development can affect implementation of the 2016 AQMP. The 2016 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2016 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2016 AQMP would not be obstructed by such growth and cumulative impacts would be less than significant. Since the Proposed Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2016 AQMP would be less than significant.

Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in Question III(c) above, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended

thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rule 1108 and 1113 limits the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rules 402 (Nuisance) and Rule 1138 (Odor Reducing Equipment) would regulate any objectionable odor impacts from the related projects and the Proposed Project's long-term operations phase. Thus, cumulative odor impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

- 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 regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in a highly urbanized area in the City of Los Angeles and is improved with a vacant fire station, a vacant library, and a learning center. The Project Site does not contain any critical habitat or support 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. According to the Proposed Project's Tree Report, prepared by the Carlberg Associates (see Appendix B of this IS/MND), vegetation on the Project Site contains 26 trees on site and six City-owned trees in the public right-of-way: four along 103rd Street and two along Success Avenue. The types of trees on-site are identified as two Chinese flames, 17 Canary Island pine trees, one Chinese elm, three lemon bottlebrush trees, and three Indian Laurel fig trees. All 26 on-site trees are proposed to be removed. However, none of the on-site property trees are considered protected trees by the City of Los Angeles Tree Preservation Ordinance No. 177,044. The six street trees consist of two flowering pear trees, three lemon bottlebrush trees, and a Chinese flame. All six trees in the public right-of-way are proposed to be reserved and would be protected. Therefore, impacts resulting from the removal of any on-site or public street trees would be less than significant.

With respect to the proposed removal of non-protected trees currently located on site and in the public right-of-way, the removal of trees has the potential to impact nesting bird species if they are present at the time of tree removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (*Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20*) and Section 3503 of the California Department of Fish and Game Code. To ensure compliance with the MBTA, the City of Los Angeles Department of City Planning advises applicants to avoid tree removal activities during the breeding season. If avoidance is not feasible, the Department recommends weekly bird surveys be conducted to ensure that the trees proposed for removal are not occupied by nesting birds. Thus, with implementation of Mitigation Measure BIO-1, listed below, the Proposed Project would reduce impacts to sensitive biological species or habitat to less than significant.

Mitigation Measures:

BIO-1 (Habitat Modification (Nesting Native Birds)):

- Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) shall take place outside of the breeding bird season which runs from March 1-August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).
- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
 - Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
 - If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
 - Alternatively, the Qualified Biologist shall continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
 - The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

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?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alternation of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is occupied by a vacant fire station, a vacant library, a counseling and learning center, and associated surface parking areas. No riparian or other sensitive natural vegetation communities are located on or adjacent to the Project Site. Therefore, implementation of the Proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities, and no impact would occur.

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?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. The Project Site is entirely developed with impermeable surfaces and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act, and no impacts to riparian or wetland habitats would occur with implementation of the Proposed Project.

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?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally result in a significant impact on biological resources if it results in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in an urbanized area of in the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. Thus, the Proposed Project would not interfere with the movement of any residents or migratory fish or wildlife. Therefore, no impact would occur.

- e) **Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?**

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. As stated above, the Project Site is improved with a vacant fire station, a vacant library, a counseling and learning center, and surface parking. There are 26 trees located on the Project Site and six trees located in the public right-of-way. There are no protected tree species located on the Project Site. Therefore, the Proposed Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. However, the existing on-site trees would be removed as a result of the Proposed Project. According to the Proposed Project's Tree Report, all 26 trees on the Project Site have a diameter of 8 inches or greater. Therefore, all trees on-site are significant. All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project Site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. The six street trees within the public right-of-way adjacent to the Project Site will be protected in place. Thus, the Proposed Project would not conflict with any tree preservation ordinance, and any potential impacts associated with the removal of any on-site trees would be less than significant.

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

No Impact. A significant impact would occur if the Proposed Project would be inconsistent with maps or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project would have a less than significant impact upon biological resources with regulatory compliance and mitigation. Development of the Proposed Project in combination with the 12 related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance Federal Migratory Bird Treaty Act, and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, and any other mitigation measures or regulatory compliance measures applicable to each project site. Thus, cumulative impacts to biological resources would be considered less than significant.

V. CULTURAL RESOURCES

The following section includes information from the Adaptive Reuse Assessment and Memorandum conducted for the Proposed Project. The Watts Engine Company No. 65, 1525 E. 103rd Street, Los Angeles, Adaptive Reuse Assessment, dated January 25, 2017, and Memorandum, dated August 18, 2017, were prepared by Architectural Resources Group (“ARG”) and are included as Appendix C to this IS/MND.

a) **Would the project cause a substantial adverse change in the significance of an historic resource pursuant to CEQA § 15064.5?**

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Proposed Project results in a substantial adverse change in the significance of a historic resource. Section 15064.5 of the State CEQA Guidelines defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain State guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency’s determination is supported by substantial evidence in light of the whole record. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.¹⁰

Section 15064.5(b)(2) of the CEQA Guidelines provides that “[t]he significance of an historical resource is materially impaired when a project:

(a) 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 of Historical Resources; or

(b) 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 Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(c) 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

¹⁰ CEQA Guidelines, Section 15064.5(b)(1).

inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The Project Site is currently developed with three buildings: 1) the Watts Municipal Building located at 1513-1525 E. 103rd Street that contains the Council Office for the 15th Council District in the west half and a decommissioned fire station (formerly Fire Station No. 65) in the east half; 2) a single-story building located at 1501 E. 103rd Street, owned by the City and is a vacant library; and 3) the Watts Counseling and Learning Center, located at 1463-1465 E. 103rd Street, operated by Kaiser Permanente. This building also includes the Preschool Education for Parents and Children, a full day early childhood education program. The vacant library and the counseling and learning center are not designated as historical resources or eligible for local listing. Therefore, the demolition of these buildings would not impact a historical resource. However, the former fire station portion is subject to the Proposed Project, which would be rehabilitated and temporarily adaptively reused as the interior for a clinic. Architectural Resources Group (ARG) prepared an evaluation of the design for the proposed adaptive reuse of the fire station portion of the Watts Municipal Building (Appendix C of this IS/MND).

ARG performed the following tasks for research, documentation, and analysis: 1) conducted a search in California's Historic Resources Inventory (HRI) for previous surveys and evaluations of the subject property; 2) reviewed state and local technical bulletins, ordinances, and other materials related to the evaluation of historical resources; 3) conducted primary and secondary source research related to the history of the subject property; 4) reviewed project plans dated December 29, 2016; and 5) analyzed the Proposed Project's conformance with the Secretary of the Interior's Standards for Rehabilitation (The Standards). In addition to primary and secondary source research, ARG conducted a site visit of the Project Site on January 4, 2017.

Previous Evaluations and Designations

The Watts Municipal Building is not designated as a historic resource under any local, state, or federal registration program. The property is not located within a previously-identified National Register or California Register eligible historic district or Los Angeles Historic Preservation Overlay Zone (HPOZ). The property was surveyed in 2011-2012 as part of the Los Angeles Citywide Survey (SurveyLA) of the Southeast Los Angeles Community Plan Area (CPA) and identified as a potential historic resource. SurveyLA surveyors determined the building was eligible for listing in the National and California Registers and as a Los Angeles Historic-Cultural Monument as an excellent and rare example of an institutional building constructed before World War II in Southeast Los Angeles. ARG concurs with the survey findings.

Architectural Description

The property sits on a rectangular half-acre parcel west of the northwest corner of Compton Avenue and E. 103rd Street. A municipal building and fire station spans the street frontage, and a small ancillary building is located at the rear northeast corner. A hose tower abuts the main building at its north façade, and a parking lot and basketball court comprise the rest of the parcel. The basketball court and parking lot are separated by a chain link fence, which delineates the boundaries of the municipal facility/west wing

and the fire station/east wing. A concrete wall and metal fence surround the perimeter of the property at the north and east property lines. The Proposed Project affects the east half of the site, including the eastern wing of the main building, the ancillary building, hose tower, and parking lot.

Exterior Description

The municipal building and fire station is a one-story, wood-framed structure clad in brick veneer and stucco. It has a roughly L-shaped plan, sits on a concrete foundation, and is capped with a low-pitched hipped roof clad in clay barrel tile (the rear sections of the roof are flat and are covered with a built-up membrane). The west wing of the building houses city offices, and the east wing contains a decommissioned fire station.

The primary (south) façade faces E. 103rd Street. The south façade features a cornice supported by decorative brackets (the cornice and brackets wrap around to the west façade). The walls of the façade are clad in brick veneer with a concrete base. A stringcourse defines the top portion of the façade, above the fenestration. The south façade projects slightly at the east and west ends. The west end of the south façade contains the entrance to the civic center portion of the building. The entrance is recessed and at the center of the projection. It features an entablature, pilasters, and an arch supported by paired columns and pilasters on either side. Steel four-over-four light single- or double-hung sash windows with triangular pediments and classical surrounds flank the entrance. Original cylindrical light sconces flank the entrance.

The projection at the east end of the south façade is distinguished by a large rectangular opening containing two recessed vehicular entrances with non-historic metal roll-up doors. Above the opening is an inscribed sign that reads “ENGINE CO. NO 65 TRUCK CO. NO 65.” The opening has been enclosed with chain link fence. Light sconces seen in early photos here are missing.

The central part of the south façade is slightly set back from the street and is fronted by foundation plantings. At the center of the façade is a stoop consisting of concrete steps bounded by knee walls and a single wood paneled door and fanlight within an arched transom. To the west of the stoop are three four-over-four light steel sash windows with fanlights. To the east of it are two four-over-four light steel sash windows with fanlights and a single metal door with fanlight. The windows are boarded (a photo image of the window behind is applied to the board).

The building’s north façade faces the parking lot and basketball court. The façade is clad with stucco and is devoid of ornamentation. Fenestration includes grouped multi-light steel windows, as well as a vehicular entry enclosed by a metal roll-up door. Most of the windows are boarded up.

The building’s east façade faces a neighboring parking lot and is finished in stucco. It contains no fenestration or decorative elements. The west half of the building, containing city offices, is outside of the scope of the Proposed Project. The west façade faces a parking lot for the building; the north part of the façade is clad with stucco and the south part is finished with brick veneer that continues from the front facade. Fenestration includes multi-light steel windows and two doors.

Interior Description (Fire Station Only)

The interior of the fire station (east wing of the building) is distinguished by a two-vehicle apparatus bay, which comprises the majority of the east wing. The apparatus bay runs the length of the east wing with two vehicular entrances at the front (south) and one vehicular entrance on the north side. The ceiling of the apparatus room is sheathed with tin paneling and contains two large rectangular iron-frame skylights with wireglass. The walls of the room are finished with sand-finish plaster and feature decorative crown molding and a wainscot with shallow gridded groove detailing and a simple dado rail. The flooring of the apparatus bay is concrete scored with a hexagonal pattern. At the center of the floor is a concrete strip tinted with an integrated red coloring and scored with a rectangular pattern.

Along the east wall of the room are storage closets, some of which retain original wood doors. The west wall of the apparatus room contains entrances to the smaller west rooms of the fire station.

The west portion of the firehouse contains dormitories, restrooms, locker rooms, and an assembly room. The ceilings and walls of the rooms are finished with plaster (the women's restroom has a non-historic tile wainscot). The dormitories, assembly room, and one of the locker rooms have linoleum or VAT tile flooring. The men's restroom and other locker room retain concrete flooring, and the women's restroom has non-historic tile flooring. Most of the rooms retain original wood paneled doors, and some of the locker doors in the locker rooms are original.

Ancillary Building

This small one-story building is framed in wood, clad in stucco, and has an L-shaped plan. It originally housed a kitchen for the fire station. The back of the L fits into the northeast corner of the property, with the north side along the alley. The roof is flat and surrounded by a parapet. Three boarded-up doors are located on the south façade (facing the parking yard), each with a square, louvered transom above. One has a later air conditioning unit mounted in the transom. Window openings centered on the short west and south facades (the ends of the L) are boarded up.

Historical Background

Development of the community was spurred by the arrival of the railroad, and Watts incorporated in 1907. Inexpensive land and proximity to a railroad station attracted working-class residents, particularly those employed by the railroads, to settle in Watts. By the 1910s, Watts was home to a diverse mixture of white, African American, Mexican and Mexican American, and Japanese and Japanese American residents. By 1925, the city had transformed into a burgeoning working class residential community, with a population of 45,000. City services included a small business district, high school, four grammar schools, the Farmers' and Merchants' Bank of Watts, the Watts Police Department, and the Watts Fire Department.

In 1926, the City of Watts voted to be annexed by the City of Los Angeles. Upon annexation, Watts' four-man fire department became a branch of the City of Los Angeles Fire Department known as Engine Company No. 65. Engine Company No. 65 continued to operate out of the Watts fire station (built in 1924), located in a building attached to the police station at the northwest corner of E. 103rd Street and Main Avenue (now Grandee Avenue). In 1934, City Council proposed a branch City Hall in Watts that

would house all city departments. The Fire Commission opposed the proposition and expressed the need for larger, more permanent facilities to house its firemen, store a fire apparatus, and provide space for hose drying. The Council and Fire Commission came to an agreement to buy a larger lot near the corner of E. 103rd Street and Compton Avenue that would be adequate for a civic building as well as the necessary facilities for the fire department.

In 1936, a new municipal building and fire station opened at 1513-1525 E. 103rd Street. Engine Company No. 65 occupied the east half of the building, and the Watts branch of Los Angeles City Hall occupied the west half. Engine Company No. 65 continued to inhabit the building until the mid-2000s. In 2004, construction began on a new Fire Station No. 65 at 1801 E. Century Boulevard. The Watts fire department branch moved to its new location in 2006. The west half of the building, which at one point housed the Watts branch of the police department, continues to be used for municipal services and is currently known as the Watts Civic Center Office Building.

Beaux Arts Architecture

The fire station is an excellent example of the Beaux Arts architectural style applied to an institutional building. Beaux Arts style architecture was introduced in the United States in the 1880s after Americans who studied at France's Ecole des Beaux-Arts returned home to practice. Principles of the Ecole des Beaux-Arts were further popularized through the World's Columbia Exposition in Chicago in 1893. Beaux Arts planning influenced America's City Beautiful movement, which was prevalent in the design of planned suburbs in the eastern United States at the turn of the twentieth century. Beaux Arts architecture combines classical elements of Greek and Roman architecture with principles of Renaissance design. Beaux Arts buildings are characterized by their classical ornamentation, symmetry, and strong sense of order. Primarily applied to grandiose residences and institutional buildings, examples of the style in Los Angeles are typically isolated. Beaux Arts architecture declined in popularity in the 1930s, and post-1940 examples are rare.

Project Impacts / Design Review

ARG has reviewed Proposed Project plans to identify potential impacts to historic features and spaces applying the Secretary of the Interior's Standards for Rehabilitation (the "Standards for Rehabilitation" or the "Standards"). The Secretary of the Interior's Standards for the Treatment of Historic Properties were developed by the National Park Service (NPS) and are employed by federal, state, and local authorities as well as architects and other historic preservation professionals to guide the treatment of historic properties. They are employed by the Office of Historic Resources to assess the appropriateness of alterations that are proposed to locally-designated historic properties, known as Historic-Cultural Monuments. The Standards encompass four treatment standards: Preservation, Rehabilitation, Restoration, and Reconstruction. The Proposed Project is most appropriately evaluated using the Standards for Rehabilitation. As NPS describes it, rehabilitation as a treatment approach "acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character." The Proposed Project's consistency with each of the ten Standards for Rehabilitation is addressed in Table III-5, below.

**Table III-5
Proposed Project Consistency with the Standards for Rehabilitation**

Standards of Rehabilitation	Evaluation
<p>1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.</p>	<p>The City intends to convert the building to community uses once Kaiser Permanente’s short- term use terminates. The saw- cut areas of the historic floor are limited to the installation of permanent facilities that will be employed for the City’s future use after Kaiser Permanente has vacated and their other improvements are removed. The more invasive installations (e.g. plumbing) will remain for the long term and are not exclusively for the temporary use.</p>
<p>2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.</p>	<p>A significant amount of the historic metal panel ceiling of the apparatus room will remain visible with the construction of smaller offices and conference rooms within the space, through a combination of unenclosed circulation areas and the limited height of most enclosures (e.g., private offices) inserted throughout the space.</p> <p>The historic ceilings will remain physically undisturbed to a good extent by avoiding attachment of structure, mechanical systems, etc. The changes will be largely reversible or repairable. In the scope of the rehabilitation, many panels may be repaired and the skylight leaks repaired, both of which are a potential net gain for the condition and appearance of the historic ceiling.</p> <p>The skylights are a character-defining feature of the building. The two skylights over the Apparatus Room will remain visible and continue to light the space per current plans. The skylights have clearly been a source of leaks, which have caused damage to the decorative metal ceiling. ARG can provide further conservation guidance if needed upon closer investigation. In any event, the goal is to maintain as much of the original material as possible and to maintain consistency with the Secretary’s Standards.</p>
<p>3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.</p>	<p>The Proposed Project meets this Standard.</p>
<p>4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.</p>	<p>The Proposed Project meets this Standard.</p>
<p>5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.</p>	<p>The Proposed Project meets this Standard.</p>

<p>6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.</p>	<p>The Proposed Project meets this Standard.</p>
<p>7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.</p>	<p>The Proposed Project meets this Standard.</p>
<p>8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.</p>	<p>The Proposed Project meets this Standard.</p>
<p>9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.</p>	<p>See discussion of Standard #10, below.</p>
<p>10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.</p>	<p>The Proposed Project meets these Standards (9 and 10). No exterior additions or major alterations are planned for the exterior of the building.</p>
<p><i>Source: Architectural Resources Group, Adaptive Reuse Assessment for Watts Engine Company No. 65, 1525 E. 103rd Street, Los Angeles, January 25, 2017; and Memorandum, August 18, 2017.</i></p>	

Affected Historic Features and Spaces

In addition to the above discussion of the Standards for Rehabilitation, ARG provided specific comments and recommendations for alterations within the apparatus room and the building exterior. As noted in the Adaptive Reuse Assessment and the accompanying Memorandum included as Appendix C to this IS/MND, ARG is satisfied that the Proposed Project generally meets the Secretary of the Interior’s Standards for Rehabilitation and that as a result, the Proposed Project would not have a significant adverse impact on the historical significance of the Fire Station property provided their recommendations are adhered to. The proposed demolition of the rear structure on the northeast corner of the property does not impact the significance of the property. The Proposed Project would retain the historic building on-site and would involve renovating the vacant Watts Engine Company No. 65 in accordance with the Secretary of the Interior’s Standards for Rehabilitation. Therefore, with implementation of Mitigation Measure CR-1, the Proposed Project’s impacts to historic resources would be mitigated to less than significant levels.

Mitigation Measure:**CR-1 Cultural Resources (Designated Historic-Cultural Resource)**

- The recommendations in the Adaptive Reuse Assessment (dated January 25, 2017) and the Memorandum (dated August 18, 2017), shall be implemented to the satisfaction City of Los Angeles Department of City Planning in order to minimize the damage done to historic finishes and features of the former Watts Engine Company No. 65. As the plans evolve beyond the schematic level, compliance with the Secretary of the Interior's Standards for Rehabilitation shall be reviewed, monitored, and carried out by the Department of City Planning.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA § 15064.5?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources. There is no evidence that suggests any archaeological sites or archaeological resources exist on the Project Site.¹¹ The Project Site has been previously developed. The Proposed Project includes: 1) the renovation of the existing fire station and demolition of the ancillary building into an administrative trailer; and 2) the demolition of the vacant library and counseling and learning center to construct a new building with medical office spaces, an expanded counseling and learning center, and up to three levels of subterranean parking. The Proposed Project also would require the removal of trees, shrubs, walls/fences, and other existing debris on site.

The Proposed Project would include excavation and grading to develop the three subterranean basement levels and ensure the proper base and slope for the proposed building. Thus, there is a potential for the accidental discovery of unknown and unrecorded archaeological materials. Because the presence or absence of such materials cannot be determined until the Project Site is excavated, the Department of City Planning requires adherence to regulatory compliance measures for proper handling of any archaeological resources discovered during construction. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Proposed Project shall not collect or move any archaeological materials and associated materials; however, construction activity may continue unimpeded on other portions of the Project Site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Adherence to regulatory compliance measures would ensure that if any archaeological resources are encountered during construction activities, impacts to such resources would remain less than significant.

¹¹ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

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

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features which presently exist within the project site. The Project Site has been previously graded and is currently improved with a vacant fire station, a vacant library, a counseling and learning center, and surface parking. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resource.¹² Although no paleontological resources are known to exist on-site, there is a potential for paleontological resources to exist at sub-surface levels on the Project Site, which may be uncovered during site excavation. In the event that paleontological resources are encountered during the construction phase, the construction activities would be required to comply with regulatory compliance measures with regards to paleontological resources. Work in the area of the find shall be halted until a qualified paleontologist has evaluated the find and provided recommendations for the proper handling of paleontological resources (Refer to Mitigation Measure CR-2 below). As such, compliance with existing regulations and Mitigation Measure CR-2 would reduce potential impacts upon paleontological resources to less than significant levels.

Mitigation Measure:

CR-2 Paleontological Resources

- If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. Deposits that are deemed by the paleontologist as constituting “unique paleontological resources” shall be treated in accordance with federal, State, and local guidelines, including preservation in place and avoidance, where feasible, or recovery and curation at the credentialed institution.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if grading or excavation activities associated with the Proposed Project would disturb previously interred human remains. No known human burials have been identified on the Project Site or its vicinity. However, it is possible that unknown human remains

¹² *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

could be discovered on the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. If human remains are encountered unexpectedly during construction, demolition, and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:
1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Compliance with regulatory compliance measures would ensure any potential impacts related to the disturbance of unknown human remains would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project, in combination with the other 12 related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following appropriate mitigation measures and regulatory compliance. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

VI. GEOLOGY AND SOILS

The following section summarizes and incorporates the reference information from the Geotechnical Investigation Report prepared by TGR Geotechnical, Inc., Updated Preliminary Geotechnical Investigation Report, Proposed Kaiser Medical Office Building/Learning Center with Subterranean Parking Garage, 1465, 1501, and 1525 East 103rd Street, Los Angeles, California, dated January 17, 2017

(“Geotechnical Investigation Report”). The Geotechnical Investigation Report is included as Appendix D of this IS/MND.

Existing Subsurface Conditions

The Project Site was explored on September 24, 2016 and December 15, 2016 by TGR Geotechnical, Inc. by excavating six exploratory borings to a depth ranging from 36.5 feet to 101.5 feet below grade. At the Project Site, the upper approximately 10 to 15 feet generally consisted of medium dense brown silty sand in a slightly moist to moist condition. Below this, medium stiff to stiff silt to clay with varying amounts of sand present was encountered to a depth of approximately 30 feet. Below this, silty to clayey sand and silty clay was present, to a depth of approximately 40 feet below ground surface. Below this was tan, moist sand to a depth of approximately 60 feet, and clay to silt to a depth of approximately 75 feet. At a depth of 75 feet to a depth of 90 feet, grey medium dense sand and sandy clay was present in a moist to very moist condition. Medium dense to sense sandy silt to silty sand was observed from 90 to 101.5 feet below existing grade. The encountered soils are consistent with the geologic map for the area (CGS, 2010). Detailed descriptions of the earth units encountered in the borings are presented in the log of borings in the Geotechnical Investigation Report (Appendix D of this IS/MND).

- a) Would the project exacerbate existing hazardous environmental conditions by bringing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone.

Based on the information contained in the Geotechnical Investigation Report by TGR Geotechnical, Inc., the Project Site is not included within any Earthquake Fault Zones as created by the Alquist-Priolo Earthquake Fault Zoning Act. There are no known active or potentially active faults located within or immediately adjacent to the Project Site. The nearest known active fault to the Project Site is the Newport-Inglewood Fault, approximately 2.8 miles away. Other faults close to the Project Site are the Puente Hills Blind Thrust Fault (4.3 miles away) and the Upper Elysian Park Blind Thrust Fault (8.6 miles away). Since no known faults are located within the Project Site, surface fault rupture is not anticipated. However, due to the close proximity of known active and potentially active faults, severe ground shaking should be expected during the life of the proposed structures.

The Project Site, like the rest of Southern California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates. The principal source of seismic activity is movement along the northwest-trending regional faults such as the San Andreas, San Jacinto and Elsinore fault zones. These fault systems produce approximately 5 to 35 millimeters per year of slip between the plates. The Project Site could be subjected to strong ground

shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be effectively managed if the proposed structures are designed and constructed in conformance with current building codes and engineering practices, and that the recommendations specified in the Geotechnical Investigation Report are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety, pursuant to Los Angeles Building Code Sections 7006.2 and California Building Code Section 1803. Based on these considerations, the potential for surface ground rupture at the Project Site is considered low, and potential impacts associated with seismic safety would remain less than significant.

b) Would the project exacerbate existing hazardous environmental conditions by bringing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. The Project Site, like the rest of Southern California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates. Since no known faults are located within the Project Site, surface fault rupture is not anticipated. However, due to the close proximity of known active and potentially active faults, severe ground shaking should be expected during the life of the proposed structures.

Parameters for seismic design are required by the Departments of Building and Safety to be set via a site-specific geotechnical assessment. These parameters for the Project Site presented in the Geotechnical Investigation Report, prepared by TGR Geotechnical. TGR Geotechnical concluded that the proposed development is considered suitable from a geotechnical viewpoint, and the recommendations contained in the Geotechnical Investigation Report have been incorporated into the design and construction phases of the Proposed Project. Accordingly, the design and construction of the Proposed Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, which would ensure impacts associated with seismic hazards would remain less than significant.

c) Would the project exacerbate existing hazardous environmental conditions by bringing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction is a seismic phenomenon in which loose, saturated, fine-grained granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when these ground conditions exist: 1) shallow groundwater; 2) low density, fine, clean sandy soils; and 3) high-intensity ground motion. Effects of liquefaction can include sand boils,

settlement, and bearing capacity failures below foundations.

Based on the City of Los Angeles General Plan Safety Element, the Project Site is located in an area designated as “liquefiable”.¹³ Additionally, as concluded in the Geotechnical Investigation Report, according to the State of California “Seismic Hazard Zones” map for the South Gate Quadrangle (CDMG 1999), the Project Site is located within an area where historic occurrences of liquefaction, or local geologic, geotechnical conditions indicate a potential for liquefaction. Groundwater was encountered in three borings at a depth ranging from 65.5 to 70 feet below ground surface. TGR Geotechnical performed a liquefaction analysis at a depth of 50 feet below the bottom of the proposed basement level to test if the soils collected have the potential for liquefaction. According to the liquefaction analysis, the soils were not considered liquefiable and have potential at few isolated thin layers. As such, the potential for liquefaction occurring at the Project Site is considered low, and impacts would be less than significant.

d) Would the project exacerbate existing hazardous environmental conditions by bringing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A project-related significant adverse effect may occur if the Project Site is located in a hillside area with soil conditions that would suggest a high potential for sliding. According to the Geotechnical Investigation Report, the Project Site is would be safe against hazard from landslide, settlement, or slippage. Based on the City of Los Angeles General Plan Safety Element, the Project Site is not located in a landslide inventory and hillside area.¹⁴ Additionally, according to the State of California “Seismic Hazard Zones” map, the Project Site is not within an area with potential for earthquake-induced landslides.¹⁵ The Project Site is relatively level, with no pronounced highs or lows. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. The probability of landslides, including seismically induced landslides, is considered to be very low due to the general lack of elevation difference across or adjacent to the Project Site. Therefore, no impact would occur.

e) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have significant sedimentation or erosion impact if it would: (a) constitute a

¹³ *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit B: Areas Susceptible to Liquefaction In the City of Los Angeles, June 1994.*

¹⁴ *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit C: Landslide Inventory & Hillside Areas In the City of Los Angeles, June 1994.*

¹⁵ *State of California, Department of Conservation, Division of Mines and Geology, South Gate Quadrangle, Seismic Hazard Zones, Los Angeles County, California, March 25, 1999.*

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 which would not be contained or controlled on-site. Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading and excavation. The potential for soil erosion during the ongoing operation of the Proposed Project is extremely low due to the generally level topography of the Project Site, and the fact that the Project Site would be mostly paved-over or built upon so little soil would be exposed. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading, excavation, and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The application of BMPs includes but is not limited to the following regulatory compliance measures: (1) Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity; and (2) stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. Compliance with regulatory measures would ensure a less-than-significant impact would occur with respect to erosion or loss of topsoil.

- f) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A significant impact may occur if the Proposed Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The liquefaction analysis conducted for the Project Site determined that the soils on-site are not liquefiable. Additionally, the Project Site is relatively level, with no pronounced highs or lows. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. The Geotechnical Investigation Report concluded that the proposed development and proposed grading will be safe against hazard from landslide, settlement, or slippage, and the proposed construction would have no adverse effect on the geologic stability of the adjacent properties provided the recommendations in the Geotechnical Investigation Report are followed. Accordingly, the design and construction of the Proposed Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, which would ensure impacts associated with unstable geologic unit or soils remain less than significant.

g) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A significant impact may occur if the Proposed Project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Based on the recommendations of the Geotechnical Investigation Report, TGR Geotechnical should observe the exposed surface soils prior to any fill placement. The site soils may be re-used as engineered fill provided they are free of organic content and particle size greater than 3-inches. Portion of the near-surface site soils were tested to have high moisture content and would require drying to meet the moisture requirements. Fill shall be moisture-conditioned to 120 percent of optimum moisture content for onsite soils and near optimum moisture content for import soils and compacted to a minimum relative compaction of 90 percent in accordance with ASTM D1557. Any import soils shall be non-expansive and approved by TGR Geotechnical Inc. Reinforcing beyond the minimum required by the City of Los Angeles Department of Building and Safety is not required. Accordingly, the design and construction of the Proposed Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, which would ensure impacts associated soil expansion would remain less than significant.

h) Would the project 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?

No Impact. This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Thus, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and any of the 12 related projects. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to adhere to appropriate regulatory compliance measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts concluded that, compliance with the regulatory compliance measures discussed above would ensure potential Proposed Project impacts are less than significant. Therefore, the Proposed Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

VII. GREENHOUSE GAS EMISSIONS

Greenhouse gas (GHG) emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. Scientific studies have concluded that there is a direct link between increased emission of GHGs and long-term global temperature. The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O). CO₂ is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).

California Global Warming Solutions Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.¹⁶ The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

In December 2008, CARB approved a Climate Change Scoping Plan. The Climate Change Scoping Plan calls for a "coordinated set of solutions" to address all major categories of GHG emissions. The Initial Scoping Plan in 2008 presented the first economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California's 2020 GHG emissions cap while ensuring progress in all sectors. The coordinated set of policies in the Initial Scoping Plan employed strategies tailored to specific needs, including market-based compliance mechanisms, performance standards, technology requirements, and voluntary reductions. The Initial Scoping Plan also described a conceptual design for a cap-and-trade program that included eventual linkage to other cap-and-trade programs to form a larger regional trading program.

¹⁶ CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% is the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012. It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In October 2017, CARB published and circulated a revised draft version of “The 2017 Scoping Plan: The Strategy for Achieving California’s 2030 Greenhouse Gas Target” that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The Revised Draft 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor’s Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California’s climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. The 2017 Scoping Plan reflects the direction from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the key existing emissions reductions programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level. A Final Scoping Plan, with all supporting materials, is anticipated to be released by December 2017.

Cap-and-Trade Program

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the greenhouse gas (GHG) emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap will be able to trade permits (allowances) to emit GHGs.

Cap-and-trade is a market-based regulation that is designed to reduce greenhouse gases (GHGs) from multiple sources. Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur

technological innovation and investments in clean energy. The Proposed Project would be exempt from the Cap-and-Trade program, since it only proposes residential uses and does not propose any industrial or high-emitting land uses.

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. Statewide reductions in GHG emissions from construction is being accomplished through continuous updates to the CALGreen Code and other State-mandated laws and regulations. The CALGreen Code encourages sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. Originally adopted in 2008, the CALGreen Code included all voluntary standards that went beyond the basic building code requirements and introduced new standards for reducing water use, provisions for reducing and recycling construction and demolition waste, criteria for site development to locate buildings near public transit, and measures for improving indoor air quality to protect the health of building occupants. In 2010, the CALGreen Code became mandatory on a statewide basis. The Proposed Project would implement the 2016 CALGreen Code (effective January 1, 2017) and any future additional construction activities necessary.

City of Los Angeles Sustainable City pLAN

On April 8, 2015, Mayor Eric Garcetti released the Los Angeles' first ever Sustainable City pLAN (The pLAN). The pLAN sets the course for a cleaner environment and a stronger economy, with commitment to equity as its foundation. The pLAN is made up of short term (by 2017) and long term (2025 and 2035) targets. The pLAN set out an ambitious vision for cutting greenhouse gas emissions, reducing the impact of climate change and building support for national and global initiatives. Los Angeles has moved to the forefront of climate innovation and leadership through bold actions on energy efficiency and electric vehicle as well as renewable energy and greenhouse gas accounting. L.A. has already reduced its greenhouse gas emissions by 20% below 1990 levels as of 2013, nearly halfway to the goal of 45% below by 2025. The City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

LA Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including AB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the

L.A. Green Code requires projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), meet the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code, meet and exceed the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC.

2016 RTP/SCS

On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016 RTP/SCS). Within the RTP, the SCS demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS sets forth a regional plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in High-Quality Transit Areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. By analyzing the performance of land use changes and transportation strategies related to GHG emissions reductions, the 2016 RTP/SCS concluded that GHG emissions per capita relative to 2005 emissions would be reduced by 8% in 2020, 18% in 2035, and 21% in 2040 in the SCAG region, which would exceed CARB's required reduction targets. These future GHG goals and conditions would be met in 2040 if investments and strategies detailed in the 2016 RTP/SCS are fully realized.

SCAQMD

SCAQMD has released draft guidance regarding interim CEQA GHG significance thresholds. In October 2008, SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial projects that emit greater than 3,000 metric tons of CO₂e per year. This target was derived based upon the notion that GHG impacts are exclusively cumulative in nature, and that no individual project can cause global climate change. As per a 2008 California Air Pollution Control Office Associations (CAPCOA) white paper, "the CEQA Guidelines recognize that there may be a point where a project's contribution, although above zero, would not be a considerable contribution to the cumulative impact and therefore, not trigger the need for a significance determination." CAPCOA went on to recommend that an appropriate threshold for residential and commercial developments would be one that captures approximately 90 percent of future development. It determined that using this approach would "set the unit threshold low enough to capture a substantial fraction of future housing and commercial developments that will be constructed to accommodate future statewide population and job growth, while setting the unit thresholds high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative reductions are being achieved across the state." Consistent with

the CAPCOA White Paper, SCAQMD staff recommended that the SCAQMD adopt significance thresholds based on an emission capture rate of 90 percent for all new and modified projects. Specifically SCAQMD determined that the GHG emissions that fell below the 90% threshold “would account for slightly less than one percent of [the] future 2050 statewide GHG emissions target...” and that using the 90% capture rate was appropriate to “implement a ‘fair share’ approach to reducing emission increases” amongst different types of projects (i.e. industrial, residential and commercial). SCAQMD determined that residential/commercial projects only contributed about 9% of GHG emissions in the Basin and that the 90% capture rate would mean that projects generating less than 1% of emissions would fall below a threshold based on the 90% standard. Based on review of over 700 projects within the Basin to determine their level of GHG emissions, SCAQMD staff determined that the 90% emissions capture rate for residential/commercial development in the Basin was between 2,983 and 3,143 MTCO₂e/yr. Based on this and other information, in September 2008, SCAQMD staff recommended that lead agencies in the Basin use the 3,000 MTCO₂e/year threshold for all non-industrial land uses within the Basin. Thus, SCAQMD, the agency with primary responsibility of air emissions in the Basin has determined, based on the evidence that it considered, which included analysis of hundreds of projects, that the 90% capture approach and 3,000 MTCO₂e/year threshold are appropriate for ensuring that the bulk of GHG emissions are captured and that the State’s GHG emissions reduction goals are achieved. While the SCAQMD Board has not officially adopted this methodology since its main jurisdiction is over industrial projects (it has adopted a threshold for industrial projects based on the same exact rationale that staff employed for the non-industrial threshold described above), it remains supported by SCAQMD’s technical analysis and is a useful indicator of the significance of a project’s greenhouse gas emissions.

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

Less Than Significant Impact. Notwithstanding the regulatory plans and building code updates discussed above, there are no federal, state or local adopted thresholds of significance for addressing a commercial project’s GHG emissions pursuant to CEQA. Section 15064.4 of the CEQA Guidelines provides direction to lead agencies in determining the significance of the impacts of GHGs, however, it does not establish a specific threshold of significant. Since the City of Los Angeles has not adopted quantitative thresholds of significance for a non-residential project’s generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines. As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

For the purposes of this analysis, a significant impact would occur if the Proposed Project would exceed SCAQMD's non-industrial target of 3,000 MTCO₂e/year or if the Proposed Project's design features are not substantially consistent with the applicable policies and/or regulations outlined in the Scoping Plan, SB 375, SCAG's 2016 RTP/CSC, and the L.A. Green Building Code.

Construction

Since the fire station phase would be limited to interior improvements and construction of a trailer, the construction activities would include hand tools and small equipment during the demolition and renovation. It is anticipated that heavy-duty diesel-powered construction equipment would not be required. The demolition of the detached kitchen and construction debris is estimated to generate approximately seven haul trips based on a haul truck capacity of eight cubic yards. Therefore, greenhouse gas emissions from the fire tenant improvement would be temporary and minimal and was not quantified in this analysis.

Construction of the Proposed Project's medical office/counseling and learning center would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the approximate 23-month duration of construction activities.

Emissions of GHGs were calculated using CalEEMod (*Version 2016.3.2*) for each year of construction of the Proposed Project and the results of this analysis are presented in Table III-6, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table III-6, the total GHG emissions from construction activities related to the Proposed Project would be 1,243.94 metric tons, with the highest GHG emissions occurring in the year 2020.

Table III-6
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO₂e Emissions (Metric Tons per Year) ^a
2019	695.30
2020	533.57
2021	15.07
Total Construction GHG Emissions	1,243.94
<i>^a Construction CO₂ values were derived using CalEEMod Version 2016.3.2 Calculation data and results are provided in Appendix E, Greenhouse Gas Emissions Calculations Worksheets. Parker Environmental Consultants, 2017.</i>	

Operation

Baseline GHG Emissions

The average daily GHG emissions generated by the existing counseling and learning center on the Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table III-7 Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with existing operations at the Project Site. As shown in Table III-7, the existing operations on the Project Site generate approximately 96.62 CO₂e MTY.

**Table III-7
Existing Project Site Greenhouse Gas Emissions**

Emissions Source	CO₂e Emissions (Metric Tons per Year)
Area	<0.01
Energy	40.96
Mobile	52.33
Waste	2.02
Water	1.31
Total	96.62
<i>Greenhouse gas emissions were estimated using CalEEMod Version 2016.3.2 Calculation data and results provided in Appendix E, Greenhouse Gas Emissions Calculations Worksheets.</i>	

Project GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Proposed Project’s compliance with the Green Building Code and other mitigating features that would be effective in reducing GHG emissions. The Proposed Project’s emissions were estimated using CalEEMod for a base project without the enhanced energy conservation measures mandated by the Green Building Code and with GHG reduction measures to effectively estimate the net benefit of code compliance measures in terms of a reduction in GHG emissions. As shown in Table III-8, below, the net increase in GHG emissions generated by the Proposed Project under the Project Without GHG Reduction Measures would be 2,917.69 CO₂e MTY and the Project With GHG Reduction Measures scenario would result in a net increase of 2,381.38 CO₂e MTY. In either case, the Proposed Project would not exceed the SCAQMD proposed non-industrial emissions target of 3,000 MTCO₂e/year.

Furthermore, for the purposes of this comparison it should be noted that the Proposed Project’s structural and operational features such as installing energy efficient lighting, low flow plumbing fixtures, and implementing an operational recycling program during the life of the Project would reduce the Project’s GHG emissions by approximately 15 percent. When considering the fact that the Proposed Project is an infill development and is recycling land and reutilizing existing structures, which is encouraged through the state, regional and local plans and policies (i.e., SB 32, SB375, and SCAG’s 2016 RTP/SCS growth strategy), the Proposed Project would realize a 18% reduction in GHG emissions as compared to a base project of the same size without replacing an existing land use.

**Table III-8
Proposed Project Operational Greenhouse Gas Emissions**

Emissions Source	Estimated Project Generated CO ₂ e Emissions (Metric Tons per Year)		
	Project Without GHG Reduction Measures	Proposed Project	Percent Reduction
Area	<0.01	<0.01	0%
Energy	751.64	751.64	0%
Mobile	1,750.30 ^a	1,476.72	16%
Waste	304.19	152.10	50%
Water	70.10	56.08	20%
Construction Emissions ^b	41.46	41.46	--
Project Total	2,917.69	2,478.00	15%
<i>Less Existing Project Site</i>	-- ^c	-96.62	--
Project Net Total	2,917.69	2,381.38	18%

Notes:
^a Since the mobile trips already incorporates trip reductions, the GHG emissions for “Project Without GHG Reduction Measures” was calculated by multiplying the ratio of trips prior to reductions with net mitigated trips.
^b The total construction GHG emissions were amortized over 30 years and added to the operation of the Proposed Project.
^c The existing emissions were not deducted from the Project Without GHG Reduction Measures to demonstrate the benefit of developing on an infill lot with active commercial/retail uses.
Calculation data and results provided in Appendix E, Greenhouse Gas Emissions Calculations Worksheets.

Through required implementation of the Green Building Code and because of the Proposed Project’s location on an infill site as well as the Project Site’s walkability and proximity to regional transit systems, the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB’s AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. Based on this and the Proposed Project’s consistency with SCAQMD’s proposed non-industrial emissions target for GHGs, the Proposed Project’s generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.

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

Less Than Significant Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if the Proposed Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. The Proposed Project would comply with the City of Los Angeles’ Green Building Ordinance standards that reduce emissions beyond the “Business-as-Usual” scenario, and are consistent with the SB 32 Scoping Plan’s recommendation for communities to adopt building codes that go beyond the state’s codes. The Proposed Project would incorporate several measures and design elements that reduce the carbon footprint of the development:

- 1. Infill Development.** The Proposed Project is located on an infill site that is currently developed with a vacant fire station, a vacant library, and a counseling and learning center. The Proposed Project would include the demolition of the existing library and counseling and learning center

which would off-set some of the Project's operational emissions. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

2. Transit Priority Area. The Proposed Project is also located in a Transit Priority Area as defined by CEQA Section 21099. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption. The Proposed Project's close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone residential uses that are not located in close proximity to transit.

3. Solid Waste Reduction Efforts. The Proposed Project is subject to construction waste reduction of at least 65 percent per 2016 CalGreen Code. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the Proposed Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

4. Water Conservation. The Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.

As described above and in Question VII(a), the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's SB 32 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

Cumulative Impacts

The GHG emissions from a development with medical office space and a counseling and learning center is relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above analyzes whether the

Proposed Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the Proposed Project's contributing effect on global warming. As concluded above, the Proposed Project's generation of GHG emissions would represent a 18% reduction in GHG emissions with GHG reduction measures in place as compared to the Proposed Project's emissions in the absence of all of the GHG reducing measures and project design features. Furthermore, the Proposed Project would be consistent with all applicable local ordinances, regulations and policies that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions, and cumulative impacts would be less than significant.

VIII. HAZARDS AND HAZARDOUS MATERIALS

The following section summarizes and incorporates the information referenced from the following reports prepared by Stantec Consulting Services, Inc. ("Stantec"):

- Phase I Environmental Site Assessment Report, 1501 E. 103rd Street, Los Angeles, California, dated December 20, 2016 ("Library Phase I ESA");
- Phase I Environmental Site Assessment Report, 1525 E. 103rd Street, Los Angeles, California, dated December 20, 2016 ("Firehouse Phase I ESA");
- Asbestos, Lead-Based Paint, Polychlorinated Biphenyls in Caulk, and Other Hazardous Materials Survey, dated December 23, 2016 ("Hazardous Materials Survey");
- Limited Phase II Environmental Site Assessment Report, 1501 E. 103rd Street, Los Angeles, California, dated March 14, 2017 ("Library Phase II ESA"); and
- Limited Phase II Environmental Site Assessment Report, 1525 E. 103rd Street, Los Angeles, California, dated March 14, 2017 ("Fire Station Phase II ESA").

The Library Phase I ESA, Firehouse Phase I ESA, Hazardous Materials Survey, Library Phase II ESA, and Firehouse Phase II ESA are all included as Appendix F to this IS/MND.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project includes the construction and operation of a building with medical office space and a counseling and learning center.

Construction

Construction could involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept

such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. The Proposed Project's construction activities would not create a significant hazard to the public through routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

Operation

The Proposed Project involves the construction and operation of medical offices, a pre-school, and counseling services and would result in the routine transport, use, or disposal of potentially hazardous cleaning agents and medical materials that are typically associated with medical office facilities and pre-school facilities. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for medical office practices, housekeeping and janitorial purposes would be employed on site. The handling of all materials transported, used, or stored on site would be in compliance with all applicable State Health Codes and Regulations. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and a less than significant impact would occur.

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

Potentially Significant Unless Mitigation Incorporated. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The Project Site is developed with three properties: a vacant fire station with an ancillary building (formerly the Fire Station No. 65), a vacant City-owned library, and the Watts Counseling and Learning Center with the Preschool Education for Parents and Children. According to available historical sources, the property located at 1525 E. 103rd Street is the former L.A. Fire Station No. 65 built circa 1936. The L.A. Fire Station No. 65 is not in operation and currently vacant. The property located at 1501 W. 103rd Street was historically used as public library. This property is gated with a single story building built circa 1960. An asphalt parking lot covers the remainder of this property. The Watts Counseling and Learning Center was built circa 1976.

Findings / Database Search

On December 1, 2016, Stantec conducted a site reconnaissance of the Project Site's properties. The Site reconnaissance focused on observation of current conditions and observable indications of past uses and conditions that may indicate the presence of a Recognized Environmental Condition (REC). A REC refers to the presence or likely presence of hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

Environmental records were reviewed to determine if there are any on- or off-site sources of documented environmental concerns. The former library building was identified in the following databases: RCRA-SQG, FINDS, and ECHO. However, no releases or violations were reported for this property. The fire station property was identified in the following databases: FINDS, ECHO, RGA LUST, HAZNET, RCRA-SQG, SWEEPS UST, HIST UST, LUST, and CA FID UST. The Firehouse Phase I ESA identified one REC in connection with the fire station. A permitted, active UST is currently documented to be on site at the fire station. The property is also listed on the State Water Resources Control Board (SWRCB) GeoTracker database as a leaking Underground Storage Tank (LUST) cleanup site. Although the cleanup status is 'Completed – Case Closed' as of March 19, 2001, the historic release and potential presence of a UST at the property constitutes a potential vapor encroachment condition (VEC) and is considered a REC. The Project Site is also located in an area that was historically populated with automotive maintenance shops, retail petroleum service stations, and laundry service. Although there are no reported releases associated with these sites, due to the proximity to the Project Site, the potential for a mixed-plume VEC is increased. The potential presence of an active UST and the risk of a potential vapor encroachment condition represent a REC for the fire station property and the former library property. It is recommended that verification of the existence of an onsite UST be conducted in coordination with an assessment of current soil vapor conditions to further evaluate the potential for a VEC.

Asbestos-Containing Materials (ACMs)

Commercial use of asbestos containing materials (ACM) as a building material was banned by the federal government in 1989. Since the on-site buildings were built prior to 1989, asbestos-containing materials may be present. Stantec identified the following ACMs at the fire station property: vinyl floor tile, adhesives, and thermal system insulation. Exposure to ACMs during demolition activities would be harmful to construction workers. Based on the planned renovation of the property, Stantec recommends that Corrective Action Option IV be implemented for the ACMs identified throughout the property, which involves complete removal, disposal, and replacement of existing ACMs. It is Stantec's understanding that these materials are scheduled for removal for the Proposed Project. If these materials are not scheduled for removal, Stantec recommends Corrective Action Option I be implemented, which involves an Asbestos Management Plan and Operations and Maintenance Program. With respect to the properties proposed for demolition, which would include the removal of potential ACMs, written notification to employees, tenants, contractors, or purchasers of the property regarding the presence and location of ACMs is required pursuant to the California Health and Safety Code 25915 (formerly known as The Connelly Bill). If identified ACMs will be removed, Stantec additionally recommends that the removal of

the ACMs be completed by an appropriately licensed contractor in accordance with all applicable federal, state, and local regulations. Provided the removal and disposal of ACMs from the Project Site follows the various guidelines required by SCAQMD Rule 1403, as well as all other applicable state and federal rules and regulations, hazardous materials impacts relative to exposure to asbestos would be less than significant.

Lead-Based Paint (LBPs)

The federal government also banned the use of lead in household paints in 1978. Exposure of workers to lead-based paint during demolition of the existing structures would be a hazardous to the health of the construction workers. Based on the findings of the hazardous materials survey conducted by Stantec, one paint type meets the definition of LBP for the fire station property. This LBP and other paints identified at the property with detectable concentrations of lead would require compliance with applicable portions of the Federal OSHA 29 CFR 1926.62 and the DOSH Section 1532.1 (Lead in Construction Standards). Compliance with mandatory state and federal regulations would ensure that the potential lead-based paint on-site would be handled properly and impacts associated with the exposure to lead-based paint would be less than significant.

Subsurface Analysis

As discussed above, Stantec identified one REC in relation to the fire station and the former library. The historic release and potential presence of a UST at the fire station property constitutes a potential vapor encroachment condition (VEC) and is considered a REC. Additionally, the Project Site is located in an area that was historically populated with automotive maintenance shops, retail petroleum service stations, and laundry facility. Although there are no reported releases associated with these sites, due to the proximity to the Project Site, the potential for a mixed plume VEC is increased. Based on the above findings, Stantec prepared limited Phase II ESA's for the fire station property and the former library property to investigate the existence of the on-site UST and assessment for vapor encroachment. The scope of work included soil assessments and soil vapor assessments.

For the fire station property, various VOCs were detected in small concentrations in samples collected from the soil vapor wells including benzene, toluene, ethylbenzene, and xylenes (collectively BTEX) all of which are constituents of gasoline. All detections of VOCs in soil vapor and sub-slab vapor were reported below OEHHA screening levels for residential and commercial/industrial use. Although the fire station property historically had petroleum storage, the lack of detection of BTEX VOCs in soil samples suggests an off-site (or limited on-site) source of these compounds, potentially the automotive maintenance shops and retail petroleum service stations that historically operated in the vicinity of the Project Site.

For the former library property, BTEX VOCs were detected in the soil vapor well samples collected from the parking lot, but were not detected in the sub-slab sample. The OEHHA screening level of benzene for residential use (36 micrograms per liter ($\mu\text{g/L}$)) was exceeded in results obtained from three vapor probes. No other chemical was reported in excess of OEHHA screening levels for residential or commercial/industrial use. The detection of fuel VOCs in soil vapor and lack of detection of fuel VOCs in

soils samples suggests an offsite source of these compounds, potentially the automotive maintenance shops and retail petroleum service stations that historically operated in the vicinity of the Project Site. Given the limited exceedance of benzene in soil vapor samples from the parking lot area, the lack of detection of benzene in the sub-slab vapor sample or any soil sample, and the planned redevelopment of the Project Site, a human health risk assessment is not warranted at this time.

Redevelopment activities can reasonably be expected to adequately remediate shallow impacts to soil and/or soil vapor at the Project Site. Creation and implementation of a Soil Management Plan would assist with management and disposal of hazardous materials as well as work protection, if encountered during grading or other subsurface work. Implementation of Mitigation Measures HAZ-1 and HAZ-2, listed below, would ensure that any on-site soils and hazardous materials would be handled and disposed of properly with approval from the Los Angeles Fire Department. The Proposed Project would be required to comply with SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil), which sets requirements to control the emission of VOCs from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. Additionally, the Proposed Project would comply with mandatory state and federal regulatory compliance measures regarding asbestos-containing materials and lead-based paint. Therefore, with compliance to SCAQMD Rule 1166 and implementation of Mitigation Measures HAZ-1 and HAZ-2, impacts with respect to existing hazardous materials would be mitigated to less than significant levels.

Mitigation Measures:

HAZ-1: Soil Management Plan

- A Soils Management Plan (SMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated soils can be properly handled, segregated, stockpiled and disposed of at a licensed disposal facility. Proper handling of the contaminated media would be required regardless of the contamination source.

HAZ-2: Removal of Hazardous Materials

- Prior to the issuance of any use of land, grading, or building permit, the applicant shall obtain a sign-off from the Fire Department indicating that all on-site hazardous materials, including and soil or groundwater contamination, have been fully remediated to the satisfaction of LAFD pursuant to local, regional, and federal regulations regarding maximum permissible concentration levels for the specific contaminants detected, or that the proposed project will not impede proposed or on-going remediation measures.

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?

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect may occur if the Project Site is

located within 0.25-miles of an existing or proposed school site and would handle hazardous materials that may release hazardous emissions, which would pose a health hazard beyond regulatory thresholds.

There are three Los Angeles Unified School District (LAUSD) schools and a private catholic school that are located within approximately one-quarter mile from the Project Site:

- Thomas Riley High School, located at 1524 E. 103rd Street (less than 100 feet south of the Project Site);
- Compton Avenue Elementary School, located at 1515 E. 104th Street (over 400 feet south of the Project Site);
- Edwin Markham Middle School, located at 1650 E. 104th Street (over 700 feet southeast of the Project Site); and
- St. Lawrence of Brindisi Catholic School, located at 10044 Compton Avenue (over 200 feet northeast of the Project Site).

The Proposed Project has the potential to expose students and staff of the identified schools to potentially hazardous materials, substances, or waste during the construction period. Localized construction impacts associated with noise, dust and localized air quality emissions, and construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. The school that would most likely experience the highest construction impacts is Thomas Riley High School, which is directly across the Project Site on 103rd Street, and Compton Avenue Elementary School, which is just south of Thomas Riley High School. The Proposed Project would provide appropriate construction measures to reduce the Proposed Project's impacts upon the nearby school facility. Further, the Project's proposed haul route would be designed to minimize, to the greatest degree possible, hauling impacts to the identified schools. The proposed haul route traveling to and from the deposit sites would utilize 103rd Street, Wilmington Avenue, the Imperial Highway ramp to the 105 Freeway (when traveling westbound), and the Wilmington Avenue ramp to the 105 Freeway (when traveling eastbound). Hauling activity utilizing 103rd Street would pass the front of Thomas Riley High School when the trucks are leaving and entering the Project Site, and would pass through Florence Griffith Joyner Elementary School, located at 1963 E. 103rd Street and Grape Street Elementary School, located at 1940 E. 111th Street when utilizing Wilmington Avenue. Implementation of Mitigation Measures HAZ-3 and HAZ-4, below, would reduce any construction impacts related to nearby schools to less than significant levels.

Mitigation Measures:

HAZ-3 Construction Activity Near Schools

- The Applicant and contractors shall maintain ongoing contact with the administrators of Thomas Riley High School and Compton Avenue Elementary School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's

Transportation Branch (323) 342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.

- The Applicant shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety during construction.
- There shall be no staging or parking of construction vehicles, including vehicles to transport workers on 103rd Street, adjacent to the schools.
- Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on 103rd Street, adjacent to the schools, during school hours.

HAZ-4 Schools Affected by Haul Route

- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the identified schools during periods when school is in session, and especially when students are arriving or departing from the campus.

During the operation of the Proposed Project, medical facilities would result in the routine transport, use, or disposal of hazardous materials typically associated with medical practices. The implementation of Mitigation Measure HAZ-1, above, would ensure that any hazardous materials shall be properly handled and transferred to a licensed disposal facility. Any operational impacts to nearby schools would be mitigated to less than significant levels.

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 exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

Potentially Significant Unless Mitigation Incorporated. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

Environmental records were reviewed to determine if there are any on- or off-site sources of documented environmental concerns. The former library building was identified in the following databases: RCRA-SQG, FINDS, and ECHO. However, no releases or violations were reported for this property. The fire station property was identified in the following databases: FINDS, ECHO, RGA LUST, HAZNET, RCRA-SQG, SWEEPS UST, HIST UST, LUST, and CA FID UST. As discussed in Question VIII(b) above, the presence of an existing UST and evidence of prior leaky UST, is considered a REC. With compliance to mandatory state and federal regulatory compliance measures and incorporation of Mitigation Measures HAZ-1 through HAZ-4, potential impacts associated with the release of hazardous

materials during the construction and operational phases would be reduced to less than significant levels.

- 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 exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?**

No Impact. A significant project-related impact may occur if the Proposed Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The closest public airport to the Project Site is the Los Angeles International Airport (LAX). However, the airport is not located within two miles of the Project Site. Furthermore, the Project Site is not located in an airport hazard area. Therefore, no impact would occur.

- f) **For a project within the vicinity of a private airstrip, would the project exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?**

No Impact. This question would apply to the Proposed Project only if it were in the vicinity of a private airstrip and would subject area workers to a safety hazard. The closest private airstrip is the Hawthorne Municipal Airport, which is not located within the vicinity of the Project Site. Therefore, no impact would occur.

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

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

Based on the Los Angeles Department of Public Works Disaster Route Map for the City of Los Angeles Central Area, the Project Site is not located on an identified disaster route.¹⁷ In the City of Los Angeles Safety Element Exhibit H, Critical Facilities & Lifeline Systems, the Project Site is located on a selected disaster route along 103rd Street.¹⁸ Development of the Proposed Project may require temporary and/or partial street closures due to construction activities. Implementation of Mitigation Measure T-2 and T-3, as discussed in Section XVI, would mitigate any construction impacts with respect to traffic to less than significant. Nonetheless, while such closures may cause temporary inconvenience, they would not be

¹⁷ *Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008.*

¹⁸ *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and any impacts would be mitigated to less than significant levels.

h) Would the project exacerbate existing hazardous environmental conditions by bringing 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?

No Impact. The Project Site is located in a highly urbanized area in the City of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).¹⁹ Therefore, no impacts from wildland fires are expected to occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the 12 related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles and the County of Los Angeles. However, the potential impact associated with the Proposed Project would be less than significant and, therefore, not cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

IX. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water

¹⁹ *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), website: www.zimas.lacity.org, accessed March 2017.*

quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include compliance with NPDES permitting system, LAMC Article 4.4, and the low impact development requirements, which reduces potential water quality impacts during the construction and operation of a project.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

The SWPPP would incorporate the required implementation of Best Management Practices (BMPs) for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Additionally, City of Los Angeles Ordinance No. 173,494 further sets procedures for stormwater pollution control for the planning and construction of development and redevelopment projects. As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

Operation

The Project Site is currently developed with three buildings: a vacant fire station, a vacant library, and a counseling and learning center. Aside from a few on-site trees and shrubs, the Project Site is completely covered with impervious surfaces. Thus, nearly 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Existing storm drain lines serving the Project Site are located along E. 103rd Street and Success Avenue. Stormwater from the Project Site along 103rd Street flows directly into stormwater inlets south of the Project Site on the northwest corner of the Civic Center/fire station building. Stormwater

along Success Avenue flows south into inlets at the intersection of Success Avenue and 103rd Street.²⁰ These storm drain lines are owned and maintained by the County of Los Angeles. The Proposed Project would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions. The Proposed Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures that would regulate the amount and water quality of stormwater leaving the Project Site.

In November 2012, the Los Angeles adopted Order No. R4-2012-0175 the NPDES Stormwater Permit for the County of Los Angeles and cities within (NPDES No. CAS00G34001). The primary objectives of the stormwater program requirements are to: (1) effectively prohibit non-stormwater discharge and (2) reduce the discharge of pollutants from stormwater conveyance systems to the maximum extent practicable statutory standard.

The Proposed Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was recently amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first 3/4-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.²¹

The Proposed Project falls within the second tier of the LID Ordinance requirements, which state that development projects that involve non-residential use and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Project Site shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). On-site stormwater management techniques must be designed so that no stormwater runoff leaving the Project Site for at least the volume

²⁰ *City of Los Angeles, Bureau of Engineering, Navigate LA, website: <http://navigatea.lacity.org/navigatea/>, accessed March 2017.*

²¹ *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

of water produced by the Stormwater Quality Design Volume (SWQDV). Development and redevelopment projects are required to prepare a LID Plan, which comply with the provisions of the Development Best Management Practices Handbook. Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.²²

In compliance with the LID Plan, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and / or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Proposed Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.²³

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, as the Proposed Project would be subject to the LID requirements and compliance procedures, operational water quality impacts would be less than significant with code compliance.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water

²² *Ibid.*

²³ *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

As discussed in Question IX (a) the Project Site is nearly 100 percent impervious. As such, nearly 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Groundwater was encountered during exploration at approximately 65 feet below existing grade. The historically highest groundwater level has been as high as 8 to 10 feet below ground surface in the general Project area.²⁴ The Proposed Project would excavate soils beneath the Project Site at approximately 35 feet below grade to allow for the construction of the proposed subterranean parking levels. The Geotechnical Investigation Report concluded that static groundwater is not anticipated to impact the Proposed Project during construction. However, in the unlikely event groundwater is encountered during the construction process, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. Additionally, adherence to Article 4.4 of the LAMC would ensure that the Proposed Project would not interfere with groundwater recharge. Therefore, with adherence to regulatory compliance measures, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project Site is located in a highly urbanized area of the City of Los Angeles, and no streams or river courses are located on or within the Project vicinity. The Project Site is nearly 100 percent impervious. Implementation of the Proposed Project would not increase site runoff or result in any changes in the local drainage patterns. Further, the Proposed Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.

²⁴ Updated Preliminary Geotechnical Investigation Report, Proposed Kaiser Medical Office Building/Learning Center with Subterranean Parking Garage, 1465, 1501, and 1525 East 103rd Street, Los Angeles, California (See Appendix D of this IS/MND).

- d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Therefore, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. In addition, the Proposed Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control, and as such, impacts would be less than significant.

- e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. A significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if a project substantially increases the probability that polluted runoff would reach the storm drain system.

Currently, the Project Site is completely developed with impervious surfaces and nearly 100 percent of surface water runoff is directed to adjacent street storm drains. Existing storm drain lines serving the Project Site are located along E. 103rd Street and Success Avenue. Stormwater from the Project Site flows directly into stormwater inlets south of the Project Site on the northwest corner of the Civic Center/fire station building. Stormwater along Success Avenue flows south into inlets at the intersection of Success Avenue and 103rd Street.²⁵ These storm drain lines are owned and maintained by the County of Los Angeles. Pursuant to local practice and City policy, stormwater retention or treatment BMPs would be required as part of the LID requirements. Any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance standards and retain or treat the first 3/4 -inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), which would reduce the Proposed Project's impact to the stormwater infrastructure. Additionally, any contaminants gathered during routine cleaning of construction equipment

²⁵ *City of Los Angeles, Bureau of Engineering, Navigate LA, website: <http://navigatea.lacity.org/navigatea/>, accessed March 2017.*

would be disposed of in compliance with applicable stormwater pollution prevention permits. The Proposed Project would comply with LAMC Chapter VI, Article 4.4 and all applicable laws and regulations pertaining to stormwater runoff and water quality would ensure impacts are less than significant. Therefore, the Proposed Project would not create or contribute to runoff water, which would exceed capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Any impacts to surface water quality would be less than significant.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Stantec Consulting Services, Inc., (“Stantec”) prepared a Water Quality Assessment Report for the fire station property, dated July 17, 2017 (Appendix J to this IS/MND). The scope of the work included collecting potable water samples from a representative water source at the fire station property. The purpose of the potable water testing was to evaluate potential additional treatment that may be necessary to meet drinking water standards.

Based on a review of microbial analyses, none of the viruses or bacteria analyzed were reported in the water samples collected from the tap water from the hose bib or Envirochek filter samples. Based on laboratory analysis of the sample, none of the water quality analytes exceeded drinking water standards. Additionally, the water quality sample was within recent City of Los Angeles Annual Drinking Water Report (2016) ranges for reported analytes, except for calcium, magnesium, and hardness (as calcium carbonate). Calcium, calcium carbonate, and magnesium were detected at higher concentrations than reported at the nearest reporting water supply source (Los Angeles Aqueduct Filtration Plant) to the fire station property. Calcium, calcium carbonate, and magnesium do not have established maximum Primary Drinking Water Maximum Contaminant Levels (MCLs) or Secondary MCLs. However, if hard water is a concern for the planned operations, the Applicant should consider incorporating plans for water softening to reduce concentrations of calcium, calcium carbonate, and magnesium in water supplied to the fire station property. Microbial analysis for enteric viruses, pseudomonas, protozoa including Giardia lamblia and Cryptosporidium, and Legionella bacteria were negative or below laboratory reporting limits. Because the fire station property would be used as an administrative office and based upon the results of sampling, a water quality management plan is not required. Further, the Proposed Project does not include potential sources of contaminants, which could potentially degrade water quality and would comply with all federal, state and local regulations governing stormwater discharge. Therefore, a less than significant impact would occur.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact would occur if the Proposed Project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood which results from a severe rainstorm with a probability of occurring approximately once every 100 years. According to the Federal Emergency Management Agency (FEMA), the Project Site is not located in an area designated as a 100-year flood

hazard area. The Project Site is in a zone designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain.²⁶ Therefore, the Proposed Project would not place housing within a 100-year flood hazard area, and no impact would occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if the Project Site was located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area as mapped by the FEMA's Flood Insurance Rate Map. The Project Site is in a zone designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain.²⁷ The Project Site is located in an urbanized area. As no changes to the local drainage pattern would occur with implementation of the Proposed Project, the Proposed Project would not have the potential to impede or redirect floodwater flows. Therefore, no impact would occur.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. A significant impact may occur if the Proposed Project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. A review of the City of Los Angeles General Plan Safety Element indicates that the Proposed Project lies within a potential inundation area of the Elysian Dam and Silver Lake Reservoir, which are located approximately 9 and 10 miles north of the Project Site, respectively.²⁸ However, the California Division of Safety of Dams regulates all dams in California with the mission to protect people against loss of life and property from dam failure.²⁹ Additionally, the LADWP regulates, monitors, and implements mitigation measures for facilities within the City's borders and facilities owned and operated by the City within other jurisdictions. The Elysian Dam and Silver Lake Reservoir are owned by the City and, therefore, must comply with all LADWP mitigation measures to prevent dam failure. Thus, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. Therefore, impacts related to the failure of a levee or dam would be less than significant.

²⁶ *Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, Panel Number 06037C1805F, September 26, 2008, website: <http://dpw.lacounty.gov/wmd/floodzone/>, accessed March 2017.*

²⁷ *Ibid.*

²⁸ *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994.*

²⁹ *California Department of Water Resources, Division of Safety of Dams, Our Mission, website: <http://www.water.ca.gov/damsafety/>, accessed March 2017.*

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact. A significant impact would occur if the Project Site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. As stated above, seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement. Review of the City of Los Angeles General Plan Safety Element, the Proposed Project lies within a potential inundation area of nearby dams/reservoirs such as the Elysian Dam and the Silver Lake Reservoir located north of the Project Site.³⁰ However, the California Division of Safety of Dams and the LADWP regulate and enforce mitigation measures to prevent inundation from occurring. Furthermore, the Project Site and the surrounding area are highly urbanized and relatively flat. The Proposed Project's potential for landsliding is considered to be low due to the lack of an elevation difference across and adjacent to the Project Site. Additionally, based on the site-specific liquefaction analysis included in the Geotechnical Investigation Report, the Project Site is not prone to liquefaction.³¹ Thus, the occurrence of mudflows on the Project Site is considered low, and no impact would occur with respect to slope instability, tsunamis, and seiches.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the 12 related projects would result in the further infilling of uses in a highly developed area within the City of Los Angeles and the County of Los Angeles. As discussed above, the Project Site and the surrounding areas are served by the existing City and County storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, under the requirements of Article 4.4 of the LAMC, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Proposed Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant.

³⁰ *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994.*

³¹ *Updated Preliminary Geotechnical Investigation Report, Proposed Kaiser Medical Office Building/Learning Center with Subterranean Parking Garage, 1465, 1501, and 1525 East 103rd Street, Los Angeles, California (See Appendix D of this IS/MND).*

X. LAND USE AND PLANNING**a) Would the project physically divide an established community?**

No Impact. A significant impact may occur if the project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Project Site is located in an urbanized area of the Southeast Los Angeles Community Plan Area (CPA) and would be consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. The Project Site is located in a densely developed neighborhood composed of single-family residences, municipal buildings, school campuses, offices, commercial strip malls, and a large recreational facility. No separations of uses or disruption of access between land use types would occur as a result of the Proposed Project. Accordingly, implementation of the Proposed Project would not disrupt or divide the physical arrangement of the established community, and no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning designations are created to avoid or mitigate. The Project Site is located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the Project area. Namely, these plans and policy areas include the following: Southeast Los Angeles Community Plan area, the South Los Angeles Alcohol Sales Specific Plan area, and the Los Angeles State Enterprise Zone (ZI-2374). The Project Site is also within a Transit Priority Area pursuant to SB 743 and noted in the City of Los Angeles' Zoning Information File No. 2452.³² These documents guide development at the Project Site.

³² *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: <http://zimas.lacity.org/>, accessed March 2017.*

Regional Plans***SCAQMD Air Quality Management Plan***

The Proposed Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's Air Quality Management Plan (AQMP) was updated in 2016 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. The most recent AQMP was adopted in March 2017. As noted in Section III, Air Quality, the Proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the Proposed Project. Therefore, the Proposed Project would be consistent with the AQMP.

Congestion Management Plan

The Congestion Management Plan (CMP) for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation and air quality decisions. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements) cities, counties, and other eligible agencies must implement the requirements of the CMP. Within Los Angeles County, the Metropolitan Transportation Authority (MTA) is the designated congestion management agency responsible for coordinating the County's adopted CMP. The Project Traffic Study was prepared in accordance with the County CMP and the City of Los Angeles Department of Transportation (LADOT) Guidelines. Project traffic impacts are analyzed in greater detail in Section XVI, Transportation and Traffic, of this IS/MND.

Transit Priority Area (SB 743)

The Project Site is an infill site within a Transit Priority Area as defined by CEQA and the City of Los Angeles. A transit priority area is defined as an area within one-half mile of a major transit stop that is existing or planned. In 2013, the State of California enacted Senate Bill 743 (SB 743), which 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." An employment center project is defined as a project located on a property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. The Proposed Project would include the rehabilitation of a fire station and the demolition of a vacant library and a counseling and learning center for the development of medical office space and an expanded counseling and learning center. The Project Site is zoned PF-1 on the eastern portion and zoned C4-1 on the western portion of the Project Site. A portion of the Project Site with the vacant library is currently zoned PF-1 and requests a zone change to C4-1 in order to operate the new counseling and learning center. Upon approval, the Project Site would be zoned for commercial land uses and thus meets the criteria of an employment center. For this reason, SB 743 would apply to the Proposed Project, as it

pertains to aesthetics and parking analysis.

Local Plans

City of Los Angeles General Plan

The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements, which include a Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 community plans.³³

The General Plan Element most applicable to the Proposed Project is the Framework Element and the Land Use Element. The Framework Element provides citywide guidelines and a foundation in which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies on. The Proposed Project would promote the Framework Economic Development Chapter's goals and objectives for commercial competitiveness, job creation and retention, and economic prosperity for the City of Los Angeles. The Project Site is currently zoned PF-1 on the eastern portion of the Project Site with a corresponding General Plan land use designation of Public Facilities and zoned C4-1 with a General Plan land use designation of Community Commercial on the western portion of the Project Site. The Land Use Element is comprised of 35 community plans. The Project Site is located in the Southeast Los Angeles Community Plan area. The Community Plan is further discussed below.

Southeast Los Angeles Community Plan

The Project Site is located within the Southeast Los Angeles Community Plan ("Community Plan") area of the City of Los Angeles. All development activity on-site is subject to the land use regulations of the Southeast Los Angeles Community Plan. The Proposed Project would revitalize the area with the rehabilitation of an existing fire station and the development of a new building with medical office uses and a counseling and learning center for Kaiser Permanente. A detailed analysis of the Proposed Project's consistency with the applicable objectives and policies of the Southeast Los Angeles Community Plan for Commercial Land Uses is presented in Table III-9, below.

The Southeast Los Angeles Community Plan addresses planning and land use issues and opportunities in various sectors, such as residential, industrial, commercial, transportation, among others. As discussed in Section XIII, Population and Housing, the Proposed Project's employee generation would be consistent with SCAG's employment growth projections for the City and SCAG region. The Proposed Project would be consistent with the goals, objectives, and policies set forth in the Southeast Los Angeles Community Plan.

³³ *City of Los Angeles Department of City Planning, General Plan Elements, website: <http://cityplanning.lacity.org/>, accessed March 2017.*

**Table III-9
Project Consistency with Applicable Objectives and Policies of the
Southeast Los Angeles Community Plan for Commercial Land Uses**

Objective / Policy	Project Consistency Analysis
<i>Commercial</i>	
Objective 2-1: To conserve and strengthen viable commercial development.	The Proposed Project includes the redevelopment and expansion of the Watts Counseling and Learning Center. As such, the Proposed Project would provide the expansion of an existing business; thus, increasing business opportunities in the Southeast Los Angeles Community. The Proposed Project would conserve and strengthen existing commercial development, which would support this Objective.
Policy 2-1.1: New commercial uses shall be located in existing, established commercial areas or existing shopping centers.	The Proposed Project would expand the existing Watts Counseling and Learning Center with the rehabilitation of the existing fire station and the development of a new building with medical offices and a counseling and learning center. The Proposed Project would revitalize a site that is currently occupied with a vacant fire station, a vacant library, and a learning center. The Project Site is located near commercial uses along 103 rd Street and Compton Avenue. Therefore, the Proposed Project would be consistent with the surrounding commercial land uses. Thus, the Proposed Project would be consistent with this policy.
Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development	The Proposed Project would consist of medical office space and a counseling and learning center. The Proposed Project does not propose any residential components. Therefore, the Proposed Project would not encroach on commercially planned/zoned areas with residential development. Thus, the Proposed Project would be consistent with this policy.
Policy 2-1.3: Commercial areas should be consolidated and deepened to stimulate existing businesses, create opportunities for new development and off-street parking, expand the variety of goods and services, and improve shopping convenience as well as offer local employment.	As discussed previously, the Proposed Project includes the redevelopment and expansion of the Watts Counseling and Learning Center. As such, the Proposed Project would provide the expansion of an existing business; thus, increasing business opportunities in the Southeast Los Angeles Community. The Proposed Project would provide local employment opportunities with the construction of a new building with medical office space and a counseling and learning center. Therefore, the Proposed Project would be consistent with this policy.
Policy 2-1.5: Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.	The Proposed Project would be designed and developed with guidance of City Planning Staff, and other necessary City departments. The Proposed Project is designed to be visually compatible with the surrounding buildings and character of the neighborhood. Compliance with regulatory compliance measures would ensure that the building maintains a safe, clean, attractive and lively environment during the Proposed Project's construction and operation. Thus, the Proposed Project would be consistent with this policy.

Objective / Policy	Project Consistency Analysis
<p>Objective 2-3: To attract uses which strengthen the economic base and expand market opportunities for existing and new businesses.</p>	<p>The Project Site is currently developed with a vacant fire station, a vacant library, and a counseling and learning center. The Proposed Project would renovate the existing fire station and demolish the remaining buildings in order to construct a new building with medical office space and an expanded counseling and learning center. The Proposed Project would provide new opportunities and the expansion of existing businesses. The Proposed Project would not adversely impact other commercial/retail stores in the vicinity of the Project Site. Instead, new employees would likely be new customers that would support nearby local businesses. As such, the Proposed Project would not hinder the goals of this objective.</p>
<p>Policy 2-3.1: Encourage the development of offices in Community and Neighborhood Centers.</p>	<p>The Proposed Project would introduce new medical office space alongside the expanded Watts Counseling and Learning Center into the Southeast Los Angeles area fronting 103rd Street. Thus, the Proposed Project would be consistent with this policy.</p>
<p>Objective 2-4: To enhance the identity of distinctive commercial districts and to identify Pedestrian Oriented Districts (POD's)</p>	<p>The Proposed Project involves the expansion of the existing Watts Counseling and Learning Center. The Project Site is in walking distance from many services, employment opportunities, and retail spaces. Additionally, the Project Site is located in a transit-rich area and is in close proximity to the 103rd Street/Watts Towers Metro Station (0.3 mile walking distance) and numerous bus routes. Thus, the Proposed Project would be consistent with this objective.</p>
<p>Policy 2-4.1: Existing Pedestrian Oriented Districts should be preserved.</p>	<p>The Proposed Project includes the expansion of the existing Watts Counseling and Learning Center. The Project Site is in walking distance from many services, employment opportunities, retail spaces, the 103rd Street/Watts Towers Metro Station, and numerous bus routes. The Proposed Project would promote pedestrian activity and other modes of public transportation. Therefore, the Proposed Project would be consistent with this policy.</p>
<p>Policy 2-4.2: New development should add to and enhance the existing pedestrian street activity.</p>	<p>The Proposed Project includes the renovation of an existing fire station and the development of a new building with medical office space and a learning center. The Project Site is in walking distance from many services, employment opportunities, retail spaces, the 103rd Street/Watts Tower Metro Station, and numerous bus routes. The Project Site is located in a Transit Priority Area which allows the future employees with opportunities for public transportation. This would help to increase pedestrian activity in the Project vicinity. Therefore, the Proposed Project is consistent with this policy.</p>

Objective / Policy	Project Consistency Analysis
<p>Policy 2-4.3: Ensure that commercial infill projects achieve harmony with the best of existing development.</p>	<p>The Proposed Project would be designed and developed with guidance of City Planning Staff, and other necessary City departments. The Proposed Project is designed to be visually compatible with the surrounding buildings and character of the neighborhood. Additionally, the Proposed Project would redevelop and expand the existing Watts Counseling and Learning Center on the existing site. Compliance with regulatory compliance measures would ensure that the building maintains a safe, clean, attractive and lively environment during the Project's construction and operation. Thus, the Proposed Project would be consistent with this policy.</p>
<p>Policy 2-4.4: New development in Pedestrian Oriented Districts shall provide parking at the rear of the property.</p>	<p>The Proposed Project would provide parking in 1 ½ levels of subterranean parking and a ½ level of above grade parking in the new proposed building. Additional parking for the administrative trailer for the fire station property would be provided in the surface parking north of the new building via private leasing agreement. Although the parking would not be provided at the rear of the property, it would be hidden from the public view and line of sight along 103rd Street. Therefore, the Proposed Project would not hinder the goals of this policy.</p>
<p>Objective 2-5: To enhance the appearance of commercial districts.</p>	<p>The Proposed Project would renovate the existing fire station and demolish the remaining buildings. The Proposed Project would revitalize the Project Site with a new building with medical office space and an expanded counseling and learning center that would help to enhance the appearance of the commercial corridors along 103rd Street and Compton Avenue. Additionally, the Proposed Project would include a public plaza fronting 103rd street to enhance the appearance along 103rd Street. Thus, the Proposed Project would be consistent with this objective.</p>
<p>Policy 2-5.1: Improve the appearance and landscaping of commercial properties.</p>	<p>The Proposed Project would provide a landscaped public plaza fronting 103rd Street. This would help enhance the commercial corridors along 103rd Street and Compton Avenue, and would also promote a pedestrian environment. The landscaped public plaza would improve the appearance and landscaping of the adjacent commercial properties. Thus, the Proposed Project would be consistent with this policy.</p>
<p>Policy 2-5.2: Preserve community character, scale and architectural diversity.</p>	<p>The Proposed Project would be designed and developed with guidance of City Planning Staff, and other necessary City departments. Additionally, the Proposed Project would be designed in accordance with plans and design guidelines that have jurisdiction over the Project Site to improve streetscape identity and character and be compatible with the scale of adjacent neighborhoods such as the LAMC. Thus, the Proposed Project is consistent with this policy.</p>

Objective / Policy	Project Consistency Analysis
Policy 2-5.3: Improve safety and aesthetics of parking areas in commercial areas.	The Proposed Project would provide parking for the new building in 1 ½ levels of subterranean parking and a ½ level of an above-grade parking podium. Additional parking for the administrative trailer for the fire station property would be provided in the surface parking north of the new building along 102 nd Street. Therefore, the parking areas would be hidden from the public view and line of sight along 103 rd Street. The internal circulation of the parking areas would require approval by the Los Angeles Fire Department and Department of Building and Safety. Therefore, the safety and aesthetics of the parking areas would be consistent with this policy.
Policy 2-5.4: Landscaped corridors should be created and enhanced along major arterials but especially along pedestrian oriented areas through the planting of street trees along segments with no building setbacks and with median plantings where medians exist.	The Proposed Project would provide a landscaped public plaza fronting 103 rd Street. The Proposed Project would also replace any removal of street trees in the public right-of-way along 103 rd Street and Success Avenue. This would help enhance the commercial corridors along 103 rd Street and would also promote a pedestrian environment. The landscaped public plaza would improve the appearance and landscaping of the adjacent commercial properties. Thus, the Proposed Project would be consistent with this policy.
Objective 2-6: To maintain and increase the commercial employment base for community residents whenever possible.	The Proposed Project would rehabilitate the vacant fire station and develop a new expanded building to replace the Watts Counseling and Learning Center and former library. The Proposed Project would provide local employment opportunities with the expansion of the Watts Counseling and Learning Center. The new medical office building space and expansion of the existing uses would increase the commercial employment base for the community residents. Thus, the Proposed Project would be consistent with the goals of this objective.
Policy 2-6.1: Protect commercial plan designations so that commercial development is encouraged.	Although this policy is directed towards the City, the Proposed Project would expand the existing Watts Counseling and Learning Center and would encourage commercial development in the Project area. Thus, the Proposed Project would be consistent with this policy.
<i>Source: City of Los Angeles, Southeast Los Angeles Community Plan, March 22, 2000. Parker Environmental Consultants, 2017.</i>	

The City is currently in the process of adopting a new Southeast Los Angeles Community Plan. A draft version was circulated for review from November 3, 2016 through February 1, 2017, and the estimated adoption date is scheduled for the end of 2017. Based on the information provided in the draft version of the Community Plan, if a board or governing body of a government agency officially determines that a property zoned PF is a surplus, and no other public agency has indicated an intent to utilize the site, the property may be rezoned to the zone most consistent within 500 feet of the property boundary and still be consistent with the adopted Plan. Until the draft Community Plan is approved, the Proposed Project would require a zone change of the library property. Nevertheless, the Proposed Project would be consistent with the current Community Plan and the draft Community Plan. Additionally, the Proposed

Project would be consistent with the commercial goals listed in the Draft Southeast Los Angeles Community Plan such as increasing local jobs, encourage office uses, and providing a range of health services. The Proposed Project would continue to be consistent with the goals, objectives, and policies set forth in new Southeast Los Angeles Community Plan upon adoption. Therefore, impacts related to the consistency with the applicable land use and planning policies in the Southeast Los Angeles Community Plan would be less than significant.

South Los Angeles Alcohol Sales Specific Plan

The Project Site is located within the South Los Angeles Alcohol Sales Specific Plan area. The Conditional Use Approval for Sale of Alcoholic Beverages Specific Plan (Ordinance No. 171,681) became effective September 13, 1997 as a response to improve the peace, health, safety and general welfare problems in the area. The Specific Plan requires a conditional use approval for establishments dispensing for sale or other consideration alcoholic beverages, including beer and wine, for off-site consumption. The Proposed Project would redevelop a site with medical office uses and an expanded counseling and learning center. Therefore, the Applicant would not request a conditional use approval for dispensing alcohol. The Proposed Project would not hinder the goals of this Specific Plan that aim to promote economic vitality, and the Specific Plan would be inapplicable to the uses proposed on the Project Site.

Los Angeles Municipal Code

Zoning and General Plan Land Use Designations

The Project Site is located within the City of Los Angeles, which is subject to the requirements in the Los Angeles Municipal Code (LAMC). The Project Site is currently improved with a vacant fire station, a vacant library, and a counseling and learning center operated by Kaiser Permanente. The Proposed Project includes the renovation of the fire station to temporarily serve as a counseling center while the new proposed building is under construction. The Proposed Project would also involve the demolition of the vacant library and the existing learning center for the construction of a new building with medical offices, the Watts Counseling and Learning Center and preschool. Therefore, the Proposed Project would expand the existing uses on the Project Site and would utilize the renovated fire station temporarily during the construction of the new proposed building.

For the portion of the Project Site that involves the demolition of existing library and counseling and learning center for the construction of a new building, the eastern portion of the Project Site is zoned PF-1 (the vacant library) and the western portion is zoned C4-1 (Watts Counseling and Learning Center). Pursuant to LAMC Section 12.04.09, private medical buildings are not permitted in a corresponding PF zone. Therefore, the Applicant is requesting a zone change from the current PF-1 zone to C4-1 across the entire site. Upon approval of a zone change, the Proposed Project's medical office uses would be consistent with the proposed zoning and General Plan Land Use designations on-site, which are C4-1 and Community Commercial, respectively. Upon zone change and land use designation approval, the Proposed Project would conform to the allowable land uses pursuant to the LAMC.

Floor Area

The Project Site is located in Height District No. 1. The “1” designation limits FAR on-site to 1.5:1. The portion of the Project Site (the two western parcels) involving the demolition of existing buildings and construction of the new building encompasses a lot area of approximately 54,683 square feet. The Proposed Project would contain 60,000 square feet of building area, which would result in a FAR of 1.1:1. Thus, the Proposed Project would be consistent with the allowed FAR permitted per the C4-1 zone.

Parking

As summarized in Table II-3, in the Project Description Section, the Proposed Project would meet the minimum on-site parking requirements of the LAMC. The Proposed Project would require a total of 123 parking spaces, which includes 120 parking spaces for the new medical office and learning center and 3 additional spaces for the construction of the new administrative trailer adjacent to the fire station. The Proposed Project plans to provide 230 parking spaces within two-level subterranean parking garage and ½ a level of above grading parking in the new building, and three parking spaces would be provided off-site via lease agreement within 750 feet of the Project Site.

The Proposed Project would also provide the required amount of on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (No. 182,386). Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply eight short-term parking spaces and 15 long-term bicycle parking spaces, for a total of 23 parking spaces. The Proposed Project would provide the required bicycle parking stalls within the subterranean parking garage. For the temporary use of the fire station, the required bicycle parking spaces would also be provided pursuant to the LAMC. Thus, the Proposed Project would be consistent with the LAMC requirements for vehicle and bicycle parking.

Regional and Local Plan Consistency

As discussed in the preceding paragraphs, the Proposed Project would not conflict with local and regional plans applicable to the Project Site, and any impacts would be less than significant.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A project-related significant adverse impact could occur if the Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed in Section IV(f) above, no such plans presently exist which govern any portion of the Project Site. Further, the Project Site is located in a highly urbanized area, and the Project Site is currently developed with a vacant fire station, a vacant library, and a counseling and learning center. Therefore, the Proposed Project would not have the potential to cause such effects, and no impact would occur.

Cumulative Impacts

No Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses and would not disrupt or divide the physical arrangement of the established community. In addition, it is reasonable to assume that the related projects under consideration would implement and support local and regional planning goals and policies. Therefore, the Proposed Project's land use impacts would not be cumulatively considerable since the Proposed Project would not conflict with applicable local or regional plans. The Proposed Project's land use would not create any significant impacts.

XI. MINERAL RESOURCES

a) **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance. The Project Site is not located within an oil field, and no oil wells are located on the Project Site. Additionally, the Project Site is not located within a Mineral Resources Zone 2 (MRZ-2). The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. The Project Site is currently developed with a vacant fire station, a vacant library, and a counseling and learning center. Development of the Project Site would not block or hinder access or availability of mineral resources. Therefore, the development of the Proposed Project would not result in the loss of availability of a known mineral resource, and no impact would occur.

b) **Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a MRZ-2 zone and is currently not used for the extraction of mineral resources. Historic research also shows that the Project Site has not been historically used for the extraction of mineral resources. Development of the Project Site would not block or hinder access or

availability of locally important mineral resources. Therefore, no impact to locally important mineral resources would occur.

XII. NOISE

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady “background” noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq} – An L_{eq} , or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- L_{max} – The maximum instantaneous noise level experienced during a given period of time.
- L_{min} – The minimum instantaneous noise level experienced during a given period of time.
- CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA “weighting” during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA “weighting” added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high

above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.³⁴

Ambient Noise Levels

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure III-2, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations fronting the adjacent residential uses, the Children’s Institute, the library, and the high school as the most likely sensitive receptors to experience noise level increases during construction. The detailed noise monitoring data are presented in Appendix G, Noise Monitoring Data and Calculation Worksheets, and are summarized below in Table III-10, Existing Ambient Daytime Noise Levels in Project Site Vicinity. As shown in Table III-10, the ambient noise in the vicinity of the Project Site ranges from 60.9 to 70.8 L_{eq}. The maximum noise level during the four 15-minute recordings was 86.8 dB L_{max} on the southwest corner of Success Avenue and E. 103rd Street, where heavy vehicle traffic along 103rd Street contributed to the higher ambient noise levels. The primary noise sources that contributed most to the measured ambient noise levels at Locations 1 and 2 were light vehicle traffic and pedestrian/commercial activity from the

³⁴ *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

**Table III-10
Existing Ambient Daytime Noise Levels in Project Site Vicinity**

No.	Location	Primary Noise Sources	Noise Level Statistics ^a		
			L _{eq}	L _{min}	L _{max}
1	On the southwest corner of the Watts Branch Library	Parking lot cars entering and exiting, people walking in parking lot, cars alarming/accelerating, helicopter overhead.	60.8	51.8	75.9
2	On the north side of E. 102 nd Street	Residents walking, light vehicle traffic, parking lot sliding gate in Children's Institute.	60.9	52.3	79.3
3	On the southwest corner of E. 103 rd Street and Firth Boulevard	Heavy vehicle traffic, pedestrian activity, buses, vehicles entering/exiting Firth Boulevard.	69.5	52.8	80.6
4	On the southwest corner of Success Avenue and E. 103 rd Street	Heavy vehicle traffic, pedestrian activity, children from park	70.8	53.6	86.8

^a Noise measurements were taken on Tuesday, June 6, 2017 at each location for a duration of 15 minutes. See Appendix G of this IS/MND for noise monitoring data sheets.

nearby bank and library. The primary noise sources that contributed to the measured ambient noise levels at Locations 3 and 4 were pedestrians and heavy vehicle traffic including cars, motorcycles, buses, and delivery trucks along E. 103rd Street.

Sensitive Receptors

Several noise sensitive land uses are located in the vicinity of the Proposed Project. For purposes of assessing noise impacts on sensitive populations, the following sensitive receptors in close proximity (within 500 feet) to the Project Site were identified:

- 1) 10205 S. Compton Avenue – Watts Branch Library, approximately 120 feet northeast of the Project Site;
- 2) 1522 E. 102nd Street – Children's Institute, approximately 20 feet north of the Project Site;
- 3) 1524 E. 103rd Street – Thomas Riley High School, approximately 100 feet south of the Project Site;
- 4) 1515 E. 103rd Street – Ozie B. Gonzaque Village, approximately 120 feet south of the Project Site;
- 5) Single-family residences north of E. 102nd Street, approximately 220 feet north of the Project Site;
- 6) 1430 E. 103rd Street - Slater Street Missionary Baptist Church; approximately 350 feet southwest of the Project Site;
- 7) Single-family residences south of E. 103rd Street and west of Success Avenue, approximately 400 feet southwest of the Project Site;

- 8) 10122 S. Compton Avenue – St. Lawrence Catholic Church, approximately 400 feet northeast of the Project Site; and
- 9) 1515 E. 104th Street – Compton Avenue Elementary School classrooms, approximately 340 feet southeast of the Project Site.

The locations of these land uses relative to the Project Site are depicted in Figure III-2, Noise Monitoring and Sensitive Receptor Location Map.

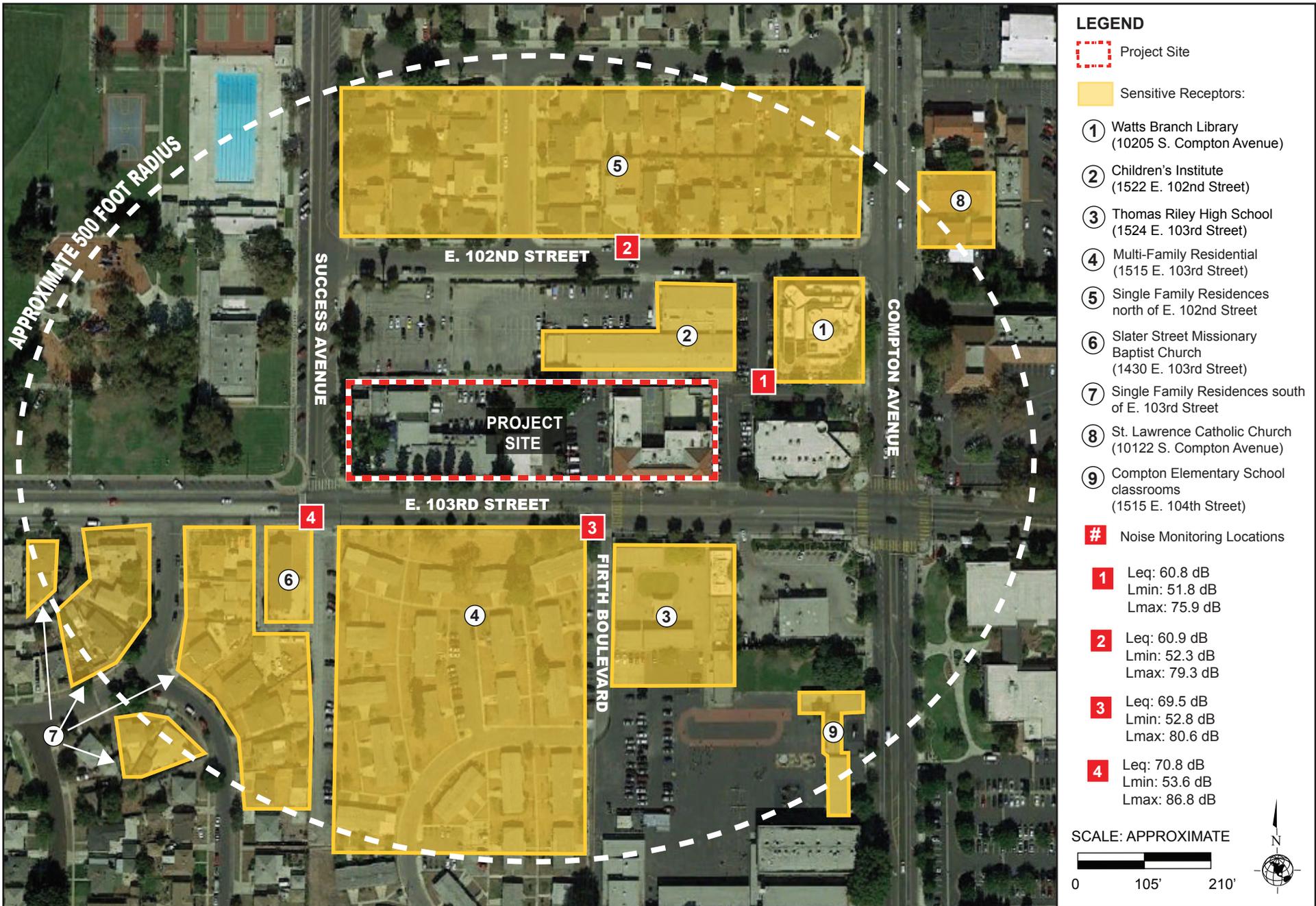
a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail, below.

Construction Noise

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. Additionally, as defined in the *L.A. CEQA Thresholds Guide* for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

Construction of the Proposed Project would require the use of heavy equipment for demolition/site clearing, grading and excavation, the installation of utilities, paving, and building construction. During each construction phase, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table III-11, Typical Outdoor Construction Noise Levels, at a distance of 50 feet from the noise source (i.e., reference distance).



Source: Google Earth, Aerial View, 2016

The noise levels shown in Table III-11 represent expected noise levels typically associated with construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. Construction noise during the heavier initial periods of construction could therefore be expected to be 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of construction activity.³⁵ These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor. Construction activities associated with the Proposed Project would be expected to generate similar noise levels to those shown in Table III-11, below during the approximate 23-month construction period.

Table III-11
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

As set forth in the *L.A. CEQA Thresholds Guide*, a significant construction noise impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact. Since construction activities associated with the proposed development at the Project Site would last for more than ten days in a three-month period, it is possible that the Proposed Project could cause a significant noise impact during construction would occur if the ambient exterior noise levels at the identified off-site and on-site sensitive receptors increase by 5 dBA or more.

Table III-12, below, shows the estimated exterior construction noise levels at the nine identified sensitive receptor locations. The Proposed Project's construction noise levels at Sensitive Receptor No. 6, 7, 8, and 9 would be below the existing ambient noise levels and thus would not be significantly impacted by the Proposed Project. Construction noise levels at Sensitive Receptor No. 1, 2, 3, 4, and 5, however, would

³⁵ *Although the peak noise levels generated by certain construction equipment may be greater than 86 dBA at a distance of 50 feet, the equivalent noise level would be approximately 86 dBA L_{eq} (i.e., the equipment does not operate at the peak noise level over the entire duration).*

potentially be exposed to noise levels that exceed a 5 dBA increase over the ambient noise levels and thus could be significantly impacted. Sensitive receptor locations 1, 2, 3, 4, and 5 currently consist of a library, a children's social services facility, a high school, an affordable housing neighborhood, and single-family residences, respectively. As such, visitors and residents to these land uses would be exposed to daytime noise levels exceeding 5 dBA above ambient noise levels. It is recommended that a temporary noise barrier be installed along the surrounding property lines to block the line-of-sight between the noise sources and the sensitive receptors. The construction of a ¾ inch plywood temporary noise barrier would be capable of attenuating the noise level by approximately 10 dBA, which would reduce construction noise impacts to the maximum extent feasible. Additional mitigation measures are discussed below to reduce noise levels during the construction phase.

**Table III-12
Estimated Unmitigated Exterior Construction Noise at Nearest Sensitive Receptors**

Receptor ^a	Address / Sensitive Land Use	Distance to Project Site (feet)	Thresholds of Significance (dBA L_{eq}) ^b	Estimated Unmitigated Construction Noise Levels (dBA L_{eq})	Noise Level Increase Above Threshold (dBA L_{eq})
1	10205 S. Compton Avenue Watts Branch Library	120	65.8	74.4	8.6
2	1522 E. 102 nd Street Children's Institute	<50	65.8	82.0	16.2
3	1524 E. 103 rd Street Thomas Riley High School	100	74.5	76.0	1.5
4	1515 E. 103 rd Street Ozie B. Gonzaque Village	120	74.5	78.4	3.9
5	Single-family residences north of E. 102 nd Street	220	65.9	73.1	7.2
6	1430 E. 103 rd Street Slater Street Missionary Baptist Church	350	75.8	69.1	0.0
7	Single-family residences south of E. 103 rd Street and west of Success Avenue	400	75.8	67.9	0.0
8	10122 S. Compton Avenue St. Lawrence Catholic Church	400	74.5	67.9	0.0
9	1515 E. 104 th Street Compton Avenue Elementary School classrooms	340	74.5	69.3	0.0

Notes

^a See Figure III-2, *Noise Monitoring and Sensitive Receptor Location Map*.

^b Pursuant to the *LA CEQA Thresholds Guide* a significant noise impact is the ambient noise level at the sensitive receptor location plus 5 dBA for construction activities lasting more than 10 days over a three-month period. (See ambient noise levels in Table III-10)

Source: Calculations based on Federal Transit Administration, *Transit Noise and Vibration Impact Assessment, Final Report, May 2006*. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.

Parker Environmental Consultants, 2017.

The City of Los Angeles Building Regulations Ordinance No. 178,048 requires 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 Project Site, and City telephone numbers where violations can be reported. The notice is required to 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.

As noted in Mitigation Measure N-1 through N-4, noise control efforts to limit the construction activities to permissible hours of construction, incorporate noise shielding devices and sound mufflers and operate machinery in a manner that reduces noise levels (i.e., not operating several pieces of equipment simultaneously if possible) would be effective in reducing noise impacts. The Proposed Project's construction noise levels would occur on a temporary and intermittent basis during the construction period of the Proposed Project. Pursuant to LAMC Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Demolition and construction are prohibited on Sundays or any federal holidays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. Mitigation Measure N-1 would further restrict the permissible hours of construction to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

Further, the Applicant would be required to post informational signage providing contact information to report complaints regarding excessive noise. With implementation of Mitigation Measures N-4 and regulatory compliance measures, affected residents and business owners would be provided advanced notice of potential noise impacts and opportunities to comment on construction noise.

In accordance with LAMC Section 112.05, construction noise levels are exempt from the 75-dBA noise threshold if all technically feasible noise attenuation measures are implemented. Mitigation Measures N-1 through N-4 would help to reduce noise levels to below the 75-dBA noise threshold for the surrounding sensitive receptors. Implementation of Mitigation Measures N-1 through N-4 would reduce the noise levels associated with construction of the Proposed Project to the nearby residents to the maximum extent that is technically feasible. Thus, based on the provisions set forth in LAMC 112.05, implementation of Mitigation Measures N-1 through N-4 would additionally ensure impacts associated with construction-related noise levels are mitigated to the maximum extent feasible, and temporary construction-related noise impacts would be considered less than significant in accordance with City requirements and standards.

Mitigation Measures:

Increased Noise Levels (Demolition, Grading, and Construction Activities)

- N-1** Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.

- N-2** Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- N-3** The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material capable of achieving a 10-dBA reduction in sound level.
- N-4** The Applicant shall provide a courtesy notice of the Project's construction related activities to the Watts Library, Children's Institute, Thomas Riley High School, and homeowner's associations a minimum of two weeks prior to commencement of construction. An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any actionable complaints shall be rectified within 24 hours of their receipt.

Operational Noise

HVAC Equipment Noise

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing buildings on the Project Site and in the Project vicinity. As such, the HVAC equipment associated with the Proposed Project would not represent a new source of noise in the Project Site vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Therefore, impacts from operational noise from the Proposed Project would be less than significant.

- b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

Potentially Significant Unless Mitigation Incorporated. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating

potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction

Excavation and earthwork activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities associated with the Proposed Project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as neither the City of Los Angeles nor the County of Los Angeles have an adopted significance threshold to assess vibration impacts during construction, the FTA and Caltrans adopted vibration standards for buildings which are referenced to evaluate potential impacts related to project construction. This analysis uses the Caltrans adopted vibration standards for buildings. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table III-13, on page III-83.

For purposes of addressing vibration impacts relative to human annoyance, the following analysis relies on the FTA's vibration impact thresholds, which are 80 VdB and above at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB and above at institutional buildings, which includes schools and churches. No thresholds have been adopted or recommended for commercial and office uses.

Table III-13
Vibration Damage Potential Threshold Criteria

Threshold Criteria	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Structure and Condition		
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
<i>Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Chapter 7: Vibration Prediction and Screening Assessment for Construction Equipment, Table 19. September 2013.</i>		

Table III-14, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table III-14, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table III-14
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40
<i>Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.</i>										

Structural Vibration Impacts

The Proposed Project would involve the rehabilitation of the decommissioned fire station, construction of a new trailer north of the fire station, and the demolition of the vacant library and counseling and learning center for the construction of a new building with medical office uses and an expanded counseling and learning center. Based on the distances of surrounding buildings within the Project vicinity, no buildings are directly abutting the buildings that would be demolished. Additionally, a setback would be proposed between the east façade of the new building and the Civic Center's western façade. Based on Figure II-9,

Construction Site Logistics Plan, in the Project Description section, there would be two building monitoring points on the northwest and southwest corner of the Civic Center Building to monitor any construction impacts on this potentially historic resource. Therefore, the Proposed Project would not physically damage the Civic Center structure and any architectural features. The Civic Center building also abuts the fire station. As discussed in Section V, Cultural Resources, the fire station is eligible for historic listing. However, the fire station does not involve exterior demolition and would be limited to interior renovations. The demolition of the ancillary building would not affect the historical significance of the Civic Center and fire station property. All alterations of the existing building would be in conformance with the Secretary of Interiors Standards for the Rehabilitation of Historic Buildings. As such, the use of any construction equipment with the potential to generate groundborne vibration would be conducted with care and under the supervision of experienced contractors that specialize in rehabilitating historic structures. Thus, construction impacts relative to structural damage from groundborne vibration would be considered less than significant.

Vibration Annoyance Impacts

In terms of human annoyance resulting from vibration generated during construction, the nearby residents, library, children's youth center, and high school previously identified and in close proximity to the Project Site would be exposed to increased vibration levels on a temporary and intermittent basis during the construction period, especially the Children's Institute located to the immediate north of the Project Site and the visitors of the Watts Branch Library. Similar to construction noise impacts, all construction activity would be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday. Implementation of the measures identified under Mitigation Measures N-1 through N-5 would serve to reduce construction related vibration levels to the maximum extent feasible, and thus would reduce the annoyance factor to an acceptable level. Because any vibration annoyance impacts experienced by nearby land uses would occur during the acceptable time periods for construction activities, and would only occur on a temporary and intermittent basis during the construction period, impacts associated with groundborne vibration would be mitigated to less than significant levels.

Operation

The Proposed Project would consist of a building with medical offices and a counseling and learning center and would not involve the use of stationary equipment that would result in high vibration levels. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on 103rd Street and Success Avenue, the proposed land uses would not result in a substantial increase in the use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur a few times a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. A significant impact may occur if the Proposed Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As defined in the *L.A. CEQA Thresholds Guide* for operational noise impacts, a project would normally have a significant impact on noise levels from Proposed Project operations if the Proposed Project causes the ambient noise level measured at the property line of affected uses that are shown in Table III-15, Community Noise Exposure (CNEL), on page III-86, to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Operational Noise

Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed for the proposed new building at the Project Site. As discussed in Question XII(a) above, the design of this equipment would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the Proposed Project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. This impact would be less than significant.

**Table III-15
Community Noise Exposure (CNEL)**

Land Use	Normally Acceptable^a	Conditionally Acceptable^b	Normally Unacceptable^c	Clearly Unacceptable^d
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

^a *Normally Acceptable:* Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

^b *Conditionally Acceptable:* New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

^c *Normally Unacceptable:* New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

^d *Clearly Unacceptable:* New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Traffic Noise

The Proposed Project would increase traffic volumes on the surrounding roadways, which in turn has the potential to increase roadway noise. According to the *L.A. CEQA Thresholds Guide*, if a project would result in traffic that is less than double the existing traffic, then the Proposed Project's mobile noise impacts can be assumed to be less than significant. According to the Proposed Project's Traffic Impact Analysis, the proposed development would result in a net increase of 2,121 daily vehicle trips, including 141 AM peak hour trips and 202 PM peak hour trips. Based on a comparison of the Proposed Project's peak hour trips compared to the existing traffic volumes at the eight study intersections, the Proposed Project would not have the potential to double the traffic volumes on any study intersection in the vicinity

of the Project Site. As such, the Proposed Project would not have the potential to increase roadway noise levels by 3 dBA, and thus traffic generated noise impacts would be considered less than significant.

To quantify the increase of the ambient noise levels at the eight study intersections from the Proposed Project, traffic noise was modeled using the California Department of Transportation, Technical Noise Supplement (2009). Traffic noise was modeled under the Existing (2017) “No Project” and “Existing (2017) With Project” scenarios to determine the environmental baseline and Project impact, respectively. The changes in future noise levels associated with the Proposed Project at locations in the surrounding intersections in the Project vicinity where sensitive receptors are located are identified in Table III-16, below, Proposed Project Noise Impacts at Study Intersections.

**Table III-16
Proposed Project Noise Impacts at Study Intersections**

Street Intersection	Peak Hour	Noise Levels in dBA CNEL			
		Existing (2017) Without Project Traffic Volumes	Existing (2017) with Project Traffic Volumes	Increase	Significant Impact?
1. Avalon Boulevard & Century Boulevard	AM	70.80	70.82	0.02	No
	PM	70.80	70.84	0.04	No
2. Avalon Boulevard & 102 nd - 103 rd Street	AM	70.80	70.84	0.04	No
	PM	70.80	70.86	0.06	No
3. Central Avenue & Century Boulevard	AM	70.80	70.83	0.03	No
	PM	70.80	70.84	0.04	No
4. Central Avenue & 103 rd Street	AM	70.80	70.86	0.06	No
	PM	70.80	70.88	0.08	No
5. Compton Avenue and Century Boulevard	AM	70.80	70.81	0.01	No
	PM	70.80	70.82	0.02	No
6. Compton Avenue & 103 rd Street	AM	70.80	70.88	0.08	No
	PM	70.80	70.95	0.15	No
7. Grandee Avenue & 103 rd Street	AM	70.80	70.91	0.11	No
	PM	70.80	70.97	0.17	No
8. Wilmington Avenue & 103 rd Street	AM	70.80	70.87	0.07	No
	PM	70.80	70.90	0.10	No

Source: Calculations based on the California Department of Transportation (Caltrans), Technical Noise Supplement (Nov. 2009) formula for adding and subtracting equal sound pressure levels. Traffic volumes are based on the Project Traffic Impact Study prepared by Linscott, Law & Greenspan, Engineers, for the Kaiser Permanente Watts Learning Center and Health Pavilion Project, City of Los Angeles, dated August 2, 2017.

As shown, the Proposed Project would increase local noise levels by a maximum of 0.17 dBA CNEL at the intersection of Grandee Avenue and 103rd Street during the PM peak hour, which would be inaudible/imperceptible to most people and would not exceed the 3-dBA CNEL threshold of significance. The remaining street intersections analyzed would all experience a 0.15 dBA CNEL increase or less. Thus, the Proposed Project’s mobile noise impacts would not exceed the 3 dBA CNEL threshold, set forth in the *L.A. CEQA Thresholds Guide*, and the Proposed Project’s mobile source noise impact would be less than significant.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As defined in the *L.A. CEQA Thresholds Guide* threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. In addition, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

As discussed above, impacts are expected to be reduced to less than significant levels for construction noise. Implementation of Mitigation Measures N-1 through N-4 would ensure the Proposed Project would not result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity, and these impacts would be reduced to 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 expose people residing or working in the project area to excessive noise levels?

No Impact. A significant impact may occur if the Proposed Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. There are no airports within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. The Proposed Project would not expose people to excessive noise levels associated with airport uses. Therefore, no impact would occur.

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

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located in the vicinity of a private airstrip. As no such facilities are located in the vicinity of the Project Site, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 12 related projects identified in Section II, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles and the County of Los Angeles. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Proposed Project study

area. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction-period noise for the Proposed Project and each related project (that has not yet been built) would be localized. In addition, each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced with feasible mitigation.

With respect to cumulative traffic noise impacts, it should be noted that the Proposed Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Project Traffic Study. Thus, the future predicted noise levels include the traffic volumes from the Proposed Project and future traffic levels associated with ambient growth and the related projects are shown in Table III-17, Cumulative Noise Impacts at Study Intersections. The highest increase in local noise levels shows a maximum of 0.45 dBA CNEL at the intersection of Compton Avenue and 103rd Street during the PM peak hour, which would not exceed the 3 dBA CNEL threshold of significance. As such, the Proposed Project's noise volumes would not be cumulatively considerable, and the cumulative impact associated with construction noise would be less than significant.

**Table III-17
Cumulative Noise Impacts at Study Intersections**

Street Intersection	Peak Hour	Noise Levels in dBA CNEL			Significant Impact?
		Existing (2017) Without Project Traffic Volumes	Future (2020) with Project Traffic Volumes	Increase	
1. Avalon Boulevard & Century Boulevard	AM	70.80	70.99	0.19	No
	PM	70.80	71.04	0.24	No
2. Avalon Boulevard & 102 nd -103 rd Street	AM	70.80	71.02	0.22	No
	PM	70.80	71.12	0.32	No
3. Central Avenue & Century Boulevard	AM	70.80	71.04	0.24	No
	PM	70.80	71.11	0.31	No
4. Central Avenue & 103 rd Street	AM	70.80	71.07	0.27	No
	PM	70.80	71.17	0.37	No
5. Compton Avenue and Century Boulevard	AM	70.80	71.07	0.27	No
	PM	70.80	71.10	0.30	No
6. Compton Avenue & 103 rd Street	AM	70.80	71.13	0.33	No
	PM	70.80	71.24	0.44	No
7. Grandee Avenue & 103 rd Street	AM	70.80	71.08	0.28	No
	PM	70.80	71.20	0.40	No
8. Wilmington Avenue & 103 rd Street	AM	70.80	71.11	0.31	No
	PM	70.80	71.19	0.39	No

Source: Calculations based on the California Department of Transportation (Caltrans), Technical Noise Supplement (Nov. 2009) formula for adding and subtracting equal sound pressure levels. Traffic volumes are based on the Project Traffic Impact Study prepared by Linscott, Law & Greenspan, Engineers, for the Kaiser Permanente Watts Learning Center and Health Pavilion Project, City of Los Angeles, dated August 2, 2017.

XIII. POPULATION AND HOUSING

- a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. A significant impact may occur if the Proposed Project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On April 7, 2016, SCAG's Regional Council adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016 RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals.

Based on the regional growth projections in the 2016 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons, 1,325,500 residences, and 1,696,400 jobs in 2012. By the year 2040, SCAG forecasts that the City of Los Angeles will increase to approximately 4,609,400 persons (20% increase from the year 2012), 1,690,300 residences (28% increase from the year 2012) and 2,169,100 jobs (28% increase from the year 2012). SCAG's population, housing, and employment projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2012 and 2040 are further summarized in Table III-18, below.

The Proposed Project would include the rehabilitation of the existing fire station and the demolition of the former library and the existing counseling and learning center for the development of a new building with medical office space and expansion of the counseling and learning center. The Proposed Project does not intend to demolish any residential housing units and would result in no net change in the number of residents or housing units in the Southeast Los Angeles Community Plan area. As such, the Proposed Project would not cause direct population growth (i.e., new housing) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout or that would result in an adverse physical change in the environment.

**Table III-18
SCAG Population and Housing Projections for the
City of Los Angeles, Los Angeles County, and the SCAG Region**

Population			
Region	2012	2040	% Growth (2012-2040)
Los Angeles City ^a	3,845,500	4,609,400	20%
Los Angeles County ^b	9,923,000	11,514,000	16%
SCAG Region ^b	18,322,000	22,138,000	21%
Households			
Region	2012	2040	% Growth (2012-2040)
Los Angeles City ^a	1,325,500	1,690,300	28%
Los Angeles County ^b	3,257,000	3,946,000	21%
SCAG Region ^b	5,885,000	7,412,000	26%
Employment			
Region	2012	2040	% Growth (2012-2040)
Los Angeles City ^a	1,696,400	2,169,100	28%
Los Angeles County ^b	4,246,000	5,226,000	23%
SCAG Region ^b	7,440,000	9,872,000	33%
<i>Source: SCAG, adopted 2016 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.</i>			

As shown in Table III-19, Estimated Proposed Project Employment Growth, the Proposed Project’s medical office and learning center components would generate the need for approximately 187 new employees. The additional employees generated by the Proposed Project would contribute to a fraction of 1 percent of SCAG’s employment growth forecast for the City of Los Angeles for the year 2040 (472,700 additional employees). Thus, the resulting employment of the Proposed Project would be within SCAG’s employment growth forecast. The Proposed Project’s medical office space and counseling and learning center may result in indirect population growth with new employees relocating to the City of Los Angeles. However, it can be assumed that most of the employees generated by the Proposed Project would already reside within the City of Los Angeles or County of Los Angeles. The new 187 employees would be consistent with SCAG’s growth projections for the Los Angeles region. Therefore, impacts related to direct population growth in the area would be less than significant.

Since it can be assumed that most of the jobs and employees generated by the Proposed Project would already reside within the City of Los Angeles or County of Los Angeles, the potential indirect increase in population caused by the Proposed Project would be minimal and consistent with SCAG’s population forecasts for the City of Los Angeles for the year 2040. As such, the Proposed Project would not cause direct growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout, and that would result in an adverse physical change in the environment; or introduce unplanned infrastructure that was not previously evaluated.

**Table III-19
Estimated Proposed Project Employment Growth**

Use	Amount	Employment Generation Factor ^a	Number of Employees
Existing Conditions			
Counseling and Learning Center	10,604 sf	1 employee / 1,250 sf	8
Total Existing Employment:			8
Proposed Project			
Medical Office	36,500 sf	1 employee / 207 sf	176
Counseling and Learning Center	23,500 sf	1 employee / 1,250 sf	19
Total Proposed Project Employment			195
<i>Less Existing Employment:</i>			<i>-8</i>
NET TOTAL Employment:			187
<i>Notes:</i>			
<i>^a The employee generation factor for existing and future uses were taken from the United States Green Building Code, Building Area per Employee by Business Type, May 13, 2008.</i>			
<i>Source: Parker Environmental Consultants, 2017.</i>			

In addition, the construction of the Proposed Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized so that construction workers remain at the job site only for the time frame in which their specific skills are needed to complete the particular task of the construction process. Project-related construction workers would not be likely to relocate their households near the Project Site, and therefore, no permanent residents would be generated as a result of the construction of the Proposed Project.

Therefore, the Proposed Project would contribute to approximately 187 new employees to the Southeast Los Angeles Community Plan area. The addition of 187 new employees is consistent with SCAG's growth projections for the Los Angeles region. As such, the Proposed Project's population and housing impacts would be less than significant.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if the Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site is developed with a vacant fire station, a vacant library, and a counseling and learning center. No residential units exist on-site. As such, the Proposed Project would not displace any existing housing. Therefore, no impact would occur.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is developed with a vacant fire station, a vacant library, and a counseling and learning center. No residential units exist on-site. Therefore, development of the Proposed Project would not displace any residents, since none exist on-site. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. As discussed in Threshold XIII(a), the Proposed Project's land uses would not cause direct growth in the Southeast Los Angeles Community Plan Area or the City of Los Angeles subregion. Because the Proposed Project does not propose any housing units and would not displace any residents, the Proposed Project's population growth would not be cumulatively considerable. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

With respect to population growth from permanent employment, the anticipated 187 new jobs that would be created by the Proposed Project would not generate substantial population growth within the region. As such, the Proposed Project's potential to result in a significant cumulative impacts associated with indirect population growth or demand for new housing, would be less than significant.

XIV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 objective for any of the following public services:

(i) Fire protection?

Less Than Significant Impact.

Construction

Construction of the Proposed Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of best management practices (BMPs) for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Proposed Project. The BMPs that would be implemented during construction of the Project would include: keeping mechanical equipment in good operating condition, and as required by law, carefully storing flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD, construction impacts are temporary in nature and do not cause

lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flagmen would be used to facilitate the traffic flow until construction is complete.

Operation

Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. Section 15382 of the CEQA guidelines defines “significant effect on the environment” as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.” Thus, the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service would only be considered significant if such activities result in a physical adverse impact upon the environment.

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to Section 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If the distance is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Proposed Project is located beyond the maximum response distance.

The Proposed Project would include a new 60,000 square-foot building with 36,500 square feet of medical office space and a 23,500 square-foot counseling and learning center that would generate approximately 187 employees.³⁶ The Proposed Project would increase the utilization of the Project Site by developing an expansion of the existing counseling and learning center and providing additional medical office space. The Proposed Project would potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 65, located at 1801 E. Century Boulevard, which is approximately 0.6 mile northeast of the Project Site. Based on the response distance criteria specified in LAMC 57.09.07A and the short distance from Fire Station No. 65 to the Project Site, fire protection response would be considered adequate.

The Proposed Project would work with LAFD and incorporate LAFD’s recommendations relative to fire safety into the building plans. As part of the Proposed Project, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where

³⁶ *An employee rate of 1 employee per 207 square feet per medical office space and approximately 1 employee per 1,250 square feet of a counseling and learning center.*

required, shall be a minimum of 20 feet in width, and all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that any impacts upon fire services created by the Proposed Project would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the three related projects within the City of Los Angeles, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Proposed Project and related projects would contribute. Similar to the Proposed Project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur.³⁷ On this basis, the Proposed Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on fire protection would be less than significant.

(ii) Police Protection?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. Section 15382 of the CEQA guidelines defines “significant effect on the environment” as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.” Thus, the addition of a new police station or police substation, if warranted, would only be considered significant if the construction or operation of a new facility results in a physical adverse impact upon the environment. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a

³⁷ *Linscott, Law, & Greenspan, Engineers, Traffic Impact Study for the Kaiser Watts Learning Center and Health Pavilion Project, August 2, 2017.*

significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the Proposed Project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Proposed Project would include a new 60,000 square-foot building with 36,500 square feet of medical office space and a 23,500 square-foot counseling and learning center that would generate approximately 187 employees.³⁸ The Proposed Project would increase the utilization of the Project Site by developing an expansion of the existing counseling and learning center and providing additional medical office space. The Proposed Project would potentially increase the demand for LAPD services. The Project Site is located in the Southeast Area division of the LAPD's South Bureau. The Project Site is served by the Southeast Community Police Station located at 145 W. 108th Street, which is approximately 1.8 miles west of the Project Site.

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. The Proposed Project would incorporate temporary construction fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area (refer to Mitigation Measure PS-1, below).

The development of the Proposed Project would result in an increase of employees and visitors to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons may escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would include adequate and strategically positioned functional and security lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of patients, guests, and employees at all times of the day would provide a sense of security during evening and early morning hours. As such, the Project guests and employees would be able to monitor suspicious activity at the building entry points (refer to Mitigation Measure PS-2, below).

³⁸ *An employee rate of 1 employee per 207 square feet per medical office space and approximately 1 employee per 1,250 square feet of a counseling and learning center.*

With implementation of Mitigation Measure PS-1 and PS-2 provided below, the Proposed Project's impacts upon LAPD services would be less than significant.

Mitigation Measure:

PS-1 Public Services (Police – Demolition/Construction Sites)

- Temporary construction fencing shall be placed along the periphery of the active construction areas to screen construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

PS-2 Public Services (Police)

- The plans shall incorporate design features (outlined in LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design") relative to security, semi-public and private spaces, which may include but is not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the three related projects within the City of Los Angeles, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in

proximity to the Project Site.³⁹ No impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

(iii) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project Site is located in LAUSD Board District 7. The Project Site is currently served by one elementary school, one middle school, and two high schools. Table III-20, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

**Table III-20
Resident Schools Serving the Project Site**

School Name	Grades	Address
96 th Street Elementary	K-5	1471 E. 96 th Street
Edwin Markham Middle School	6-8	1650 E. 104 th Street
Animo College Preparatory Academy	9-12	2265 E. 103 rd Street
David Starr Jordan Senior High School	9-12	2265 E. 103 rd Street
<i>Notes: Some schools are charter schools and require an application process prior to student enrollment. Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed March 2017.</i>		

As shown in Table III-21, Proposed Project Estimated Student Generation, the Proposed Project would generate a net increase of approximately one elementary student, one middle school student, and one high school student, for a total of three students. The Proposed Project's impact on local schools would be minimal. Nevertheless, the Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of School Development Fee, the Proposed Project's would further ensure the impact upon public school services would be less than significant.

³⁹ *Linscott, Law, & Greenspan, Engineers, Traffic Impact Study for the Kaiser Watts Learning Center and Health Pavilion Project, August 2, 2017.*

**Table III-21
Proposed Project Estimated Student Generation**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Existing Project					
Counseling and Learning Center ^a	10,604 sf	0	0	0	0
Total Existing Students:		0	0	0	0
Proposed Project					
Medical Office / Counseling and Learning Center	60,000 sf	1	1	1	3
Total Project Student Generation:		1	1	1	3
<i>Less Existing Students:</i>		<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
NET Student Generation:		1	1	1	3
<i>Notes: sf = square feet</i> ^a <i>Student generation rates are as follows for office uses: .0233 elementary, .0108 middle and .0104 high school students per 1,000 square feet.</i> <i>Source: Los Angeles Unified School District, School Fee Justification Study, September 2002.</i>					

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the 12 related projects is expected to result in a cumulative increase in the demand for school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. This would create an increased cumulative demand on local school districts. However, each of the new housing units would be responsible for paying mandatory school fees to mitigate the increased demand for school services. The Proposed Project includes the renovation and use of an existing fire station and the expansion of an existing counseling and learning center with additional medical office space. The Proposed Project would not result in any new housing units and would not have the potential to contribute to cumulative housing or student generation impacts. As such, the Proposed Project’s cumulative impacts upon schools would be less than significant. Therefore, cumulative impacts on schools would be less than significant.

(iv) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the proposed project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Proposed Project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, 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).

The Proposed Project includes the rehabilitation of an existing fire station and the demolition of a vacant library and existing counseling and learning center for the construction of a new building with medical office space and as an expansion of the counseling and learning center. The Proposed Project does not include any housing units and would therefore not generate new residents in the Southeast Los Angeles Community Plan area. The Proposed Project would also provide a public plaza fronting E. 103rd Street, which would provide publically accessible open space for the Proposed Project's visitors and employees. Therefore, the Proposed Project would not result in a demand on local parks and recreational facilities. As such, a less than significant impact would occur with respect to park services.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects could result in an increase in permanent residents residing in the greater Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with payment of Quimby Fees (for subdivision projects with greater than 50 units) and/or park mitigation fees (for all other residential projects). Each residential related project would also be required to comply with the on-site open space requirements of the LAMC or the Los Angeles County Code. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Proposed Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

(v) Other Public Facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

The Proposed Project includes the rehabilitation of an existing fire station and the demolition of a vacant library and existing counseling and learning center for the construction of a new building with medical office space and as an expansion of the counseling and learning center. The Proposed Project does not include any housing units and would therefore not generate new residents in the Southeast Los Angeles Community Plan area. The operation of the Proposed Project would not cause a demand on local public libraries. As such, a less than significant impact would occur with respect to library or other public facilities services.

Cumulative Impacts

Less Than Significant Impact. Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for \$178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. The LAPL is committed to increase the number of people who use the library services, to increase the number of library cardholders and actively promote the robustly market programs and services to increase residents' overall engagement with the libraries.⁴⁰ Therefore, the cumulative impacts related to library facilities would be less than significant level.

XV. RECREATION

a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

No Impact. A significant impact may occur if the project would include substantial employment or population growth, which would 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the proposed project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, 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).

The Proposed Project includes the rehabilitation of an existing fire station and the demolition of a vacant library and existing counseling and learning center for the construction of a new building with medical office space and as an expansion of the counseling and learning center. The Proposed Project would also provide a public plaza fronting E. 103rd Street. The Proposed Project does not include any residential uses and therefore, would not generate demands for open space and would not substantially 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, and no impacts would occur.

⁴⁰ *Los Angeles Public Library Strategic Plan 2015-2020, June 2015.*

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

No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As previously discussed in Checklist Question XV(a) the Proposed Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site which might have an adverse physical effect on the environment. Thus, there would be no impact.

Cumulative Impacts

Less Than Significant Impact. The related projects that include residential units would be required to pay recreation taxes and/or applicable Quimby fees to mitigate impacts upon park and recreational facilities and to provide additional funds to meet Citywide park goals. Additionally, each related project would be subject to the provisions of the LAMC and the Los Angeles County Code for providing on-site open space, which is proportionately based on the amount of new development. Therefore, development of the Proposed Project and related projects would have a less than significant cumulative impact on recreational resources.

XVI. TRANSPORTATION AND TRAFFIC

The following section summarizes and incorporates by reference the information provided in the *Traffic Impact Study, Kaiser Permanente Watts Learning Center and Health Pavilion Project* (“Traffic Study”), provided by Linscott, Law & Greenspan, Engineers, dated August 2, 2017 and the Traffic Impact Assessment for the Proposed Mixed Use Medical Office/Counseling Center Located at 1463 East 103rd Street (LADOT Case No. HRB17-105790), prepared by Los Angeles Department of Transportation, dated August 23, 2017. The Traffic Study and LADOT Correspondence Letter are included as Appendix H of this IS/MND.

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

Potentially Significant Unless Mitigation Incorporated. The Traffic Study’s analysis follows the City of Los Angeles Department of Transportation’s (LADOT) Transportation Impact Study Guidelines and is consistent with traffic impact assessment guidelines set forth in the Los Angeles County Congestion Management Program. The Traffic Study evaluates potential project-related impacts at eight key intersections in the vicinity of the Project Site. The study intersections were determined in consultation with LADOT staff. The Critical Movement Analysis method was used to determine Volume-to-Capacity (V/C) ratios and corresponding Levels of Service for all eight study intersections. A review also was conducted of Los Angeles County Metropolitan Transportation Authority freeway and intersection monitoring stations to determine if a Congestion Management Program transportation impact assessment

analysis is required for the Proposed Project.

In addition, a screening analysis was also completed as it relates to the State of California Department of Transportation (Caltrans) highway system. The Traffic Study (i) presents Existing (2017) traffic volumes, (ii) includes Existing traffic volumes with the forecast traffic volumes from the Proposed Project, (iii) recommends mitigation measures, where necessary, (iv) forecasts Future (2020) cumulative baseline traffic volumes, (v) forecasts Future (2020) traffic volumes with the Proposed Project, (vi) determines future forecast with project-related impacts, and (vii) recommends mitigation measures, where necessary.

The Proposed Project consists of the construction of a new, 60,000 square-foot building with 36,500 square feet of medical office space and 23,500 square feet of counseling and learning center space.⁴¹ The proposed counseling and learning center space would include the existing Preschool Education for Parents and Children (PEPC), which is planned to accommodate up to 30 students (i.e., eight additional students). The counseling and administrative functions of the existing counseling and learning center would be temporarily relocated to a leased portion of the adjacent existing Fire Station 65 building, while the existing PEPC would be temporarily relocated to the Drew Children’s Development Corporation site during construction of the Proposed Project. The existing counseling/learning center and library buildings would be demolished to accommodate the Proposed Project. A new drop-off/pick-up zone along the north side of 103rd Street as well as a new public plaza is planned to be provided as part of the Proposed Project. A total of 230 parking spaces would be provided on-site within 1 ½ levels of subterranean parking and ½ level of an above-grade parking podium, including 35 parking spaces allocated for use by City staff from the adjacent Fire Station building. It is important to note that the Traffic Study’s analysis is limited to the new building and does not analyze the impacts from the temporary use of the fire station.

Study Area

Upon coordination with LADOT staff, a total of eight study intersections have been identified for evaluation during the weekday morning and afternoon peak hours. These eight study intersections provide local access to the study area and define the extent of the boundaries for this traffic impact analysis. The traffic analysis study area is generally comprised of those locations which have the greatest potential to experience significant traffic impacts due to the Proposed Project. In the traffic engineering practice, the study area generally includes those intersections that are: a) Immediately adjacent or in close proximity to the project site; b) In the vicinity of the project site that are documented to have current or projected future adverse operational issues; and c) In the vicinity of the project site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements.

- | | |
|---|---|
| 1. Avalon Boulevard & Century Boulevard | 5. Compton Avenue & Century Boulevard |
| 2. Avalon Boulevard & 102 nd Street-103 rd Street | 6. Compton Avenue & 103 rd Street |
| 3. Central Avenue & Century Boulevard | 7. Grandee Avenue & 103 rd Street |
| 4. Central Avenue & 103 rd Street | 8. Wilmington Avenue & 103 rd Street |

⁴¹ *The Traffic Study analyzed a bigger project that proposes a 75,000 square-foot building with 51,500 square feet of medical office space and a 23,500 square-foot counseling and learning center. This is a conservative analysis compared to the Proposed Project, which proposes a 60,000 square-foot building with 36,500 square feet of medical office space and a 23,500 square-foot counseling and learning center.*

The locations selected for analysis were based on the above criteria, Proposed Project peak hour vehicle trip generation, the anticipated distribution of Project vehicular trips and existing intersection/corridor operations. Immediate access to the Proposed Project is provided via Success Avenue, 103rd Street and the existing alleyway located north of the Project Site. All eight study intersections selected for analysis are presently controlled by traffic signals. The eight study intersections and existing lane configurations at the study intersections are displayed in Figure III-3, on page III-105.

Traffic Impact Criteria and Thresholds

The study intersections were evaluated using the Critical Movement Analysis (CMA) method of analysis that determines Volume-to-Capacity (V/C) ratios on a critical lane basis. The overall intersection V/C ratio is subsequently assigned a Level of Service (LOS) value to describe intersection operations. Level of Service varies from LOS A (free flow) to LOS F (jammed condition).

The relative impact of the added project traffic volumes to be generated by the Proposed Project during the weekday AM and PM peak hours was evaluated based on analysis of existing and future operating conditions at the study intersections, without and with the Proposed Project. The previously discussed capacity analysis procedures were utilized to evaluate the future V/C relationships and service level characteristics at each study intersection. The significance of the potential impacts of Project-generated traffic was identified using the traffic impact criteria set forth in LADOT’s Transportation Impact Study Guidelines, December 2016. According to the City’s published traffic study guidelines, the impact is considered significant if the Project-related increase in the V/C ratio equals or exceeds the thresholds presented in Table III-22, below.

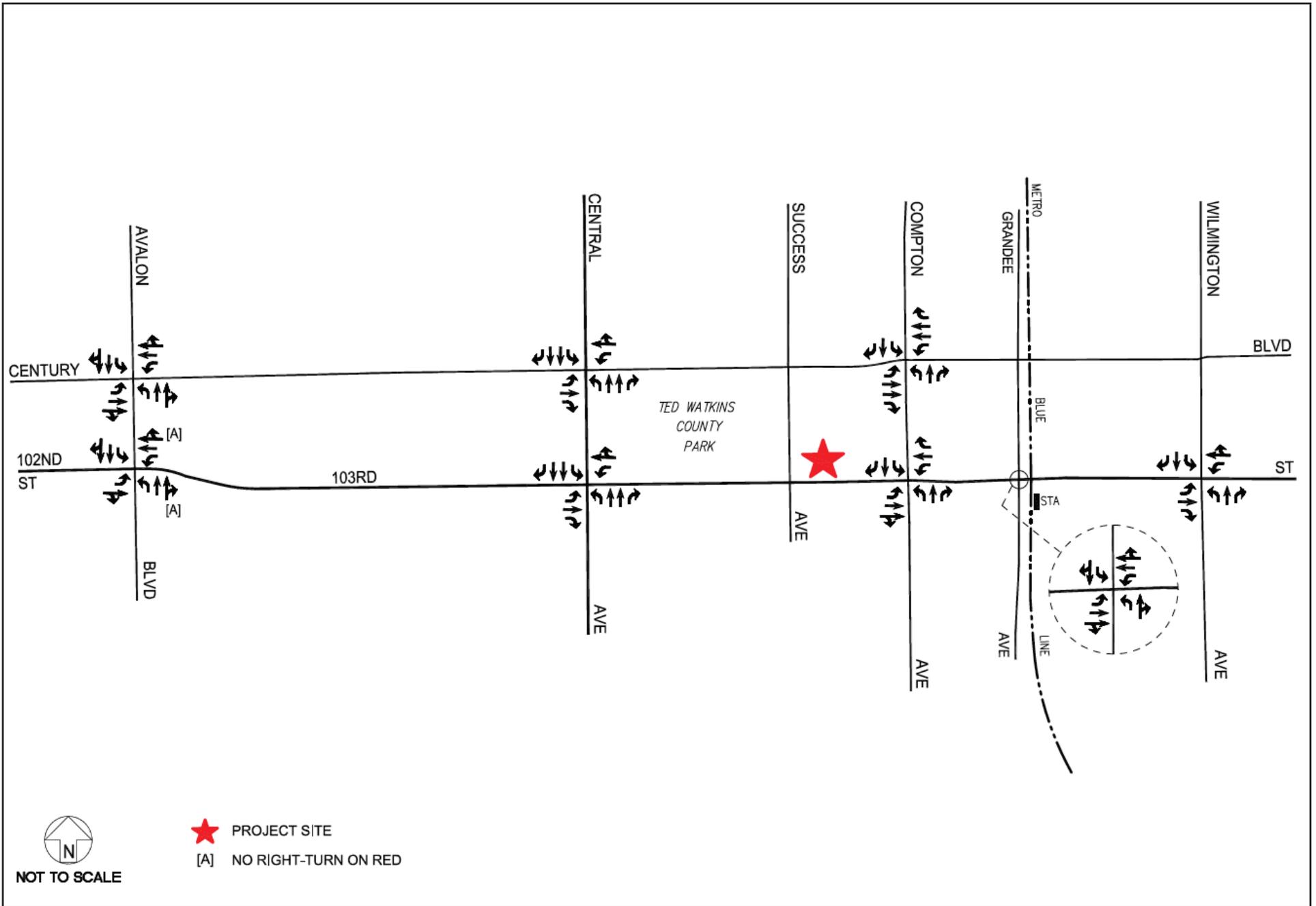
**Table III-22
Definition of Significant Impact at Intersection**

Level of Service	Volume-to-Capacity (V/C)	Project-related Increase in Volume-to-Capacity (V/C) Ratio
C	0.701–0.800	Equal to or greater than 0.04
D	0.801–0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01

Existing Conditions

Site Access and Circulation

Vehicular access to the Project Site is currently provided at five locations: two driveways on 103rd Street and two driveways from the existing alleyway for the existing Library building and one driveway from the existing alleyway for the existing Watts Counseling and Learning Center. The three existing site driveways from the alleyway currently provide full access (i.e., left-turn and right-turn ingress and egress turning movements). The existing easterly 103rd Street driveway currently provides full access while the westerly 103rd Street driveway is currently limited to right-turn ingress and egress traffic movements (i.e., left-turn ingress and egress traffic movements are not allowed).



Source: Linscott, Law & Greenspan, Engineers, August 2017.

Transit Services

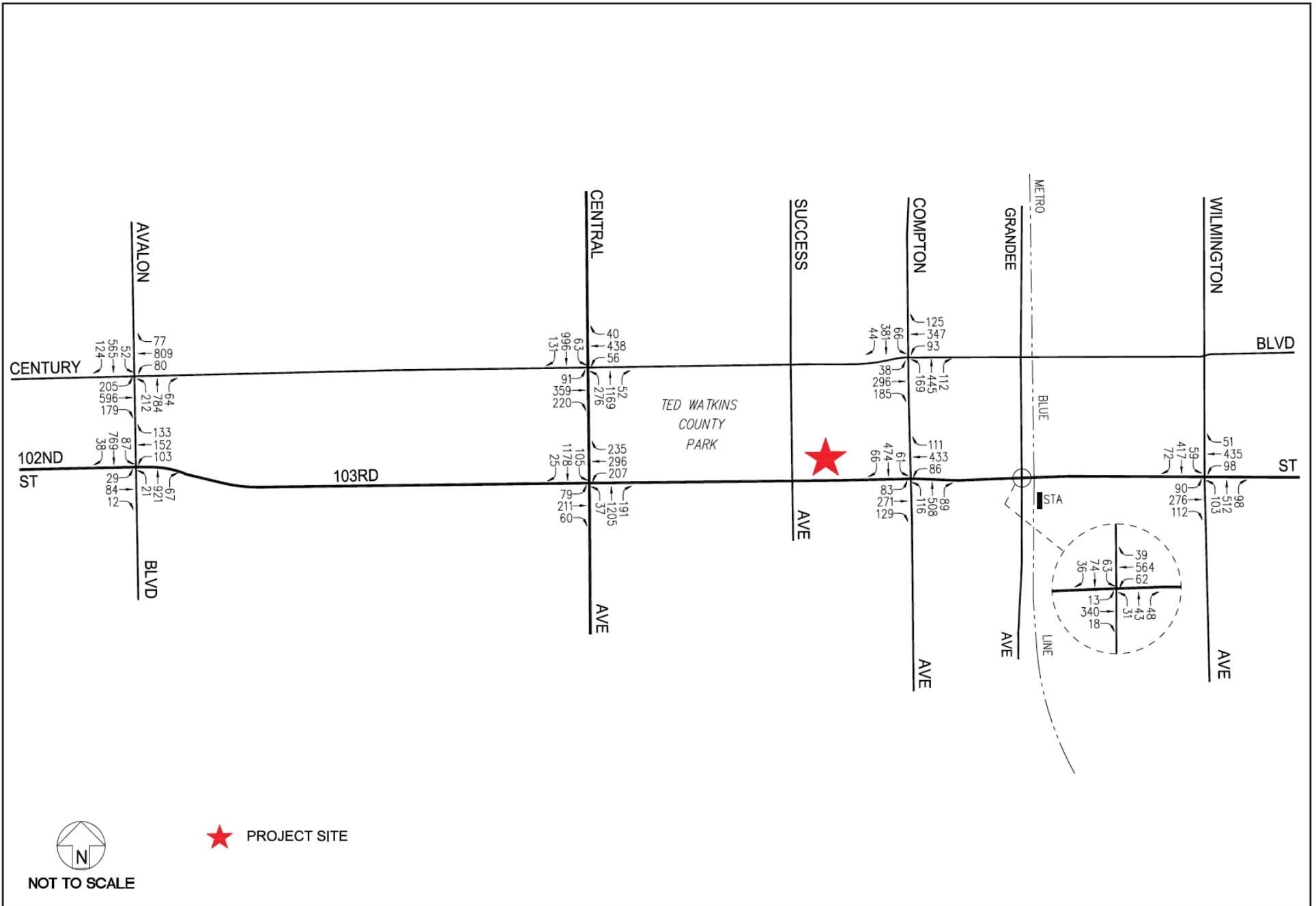
Public transit service within the Project study area is currently provided by Los Angeles County Metropolitan Transportation Authority (Metro) and LADOT DASH. The Project vicinity is served by eight Metro bus lines (48, 51/52/351, 53, 55/355, 117, 202, 254, and 612) and the LADOT DASH Watts Line. The Metro Blue Line is a light rail transit line that provides service from Downtown Los Angeles to the City of Long Beach. The Metro Blue Line 103rd Street/Watts Tower station is located on the south side of 103rd Street between Grandee Avenue and Graham Avenue, east of the Project Site. During the weekday AM and PM peak hours, Metro Blue Line light rail line provides headways of six minutes per train (i.e., approximately 10 Blue Line trains) in the northbound and southbound directions.

Traffic Counts

Manual counts of vehicular turning movements were conducted at each of the eight study intersections during the weekday morning (AM) and afternoon (PM) commuter periods to determine the peak hour traffic volumes. The manual counts were conducted in May 2017 by an independent traffic count subconsultant (The Traffic Solution) at the eight study intersections from 7:00 to 10:00 AM to determine the AM peak commuter hour, and from 3:00 to 6:00 PM to determine the PM peak commuter hour. It is noted that all of the traffic counts were conducted when local schools were in session. Traffic volumes at the study intersections show the typical peak periods between 7:00 to 10:00 AM and 3:00 to 6:00 PM generally associated with metropolitan Los Angeles peak commuter hours. The existing traffic volumes at the study intersections during the weekday AM and PM peak hours are shown in Figure III-4 and Figure III-5, respectively. Summary data worksheets of the manual traffic counts at the study intersections are contained in Appendix A of the Traffic Study.

Related Projects

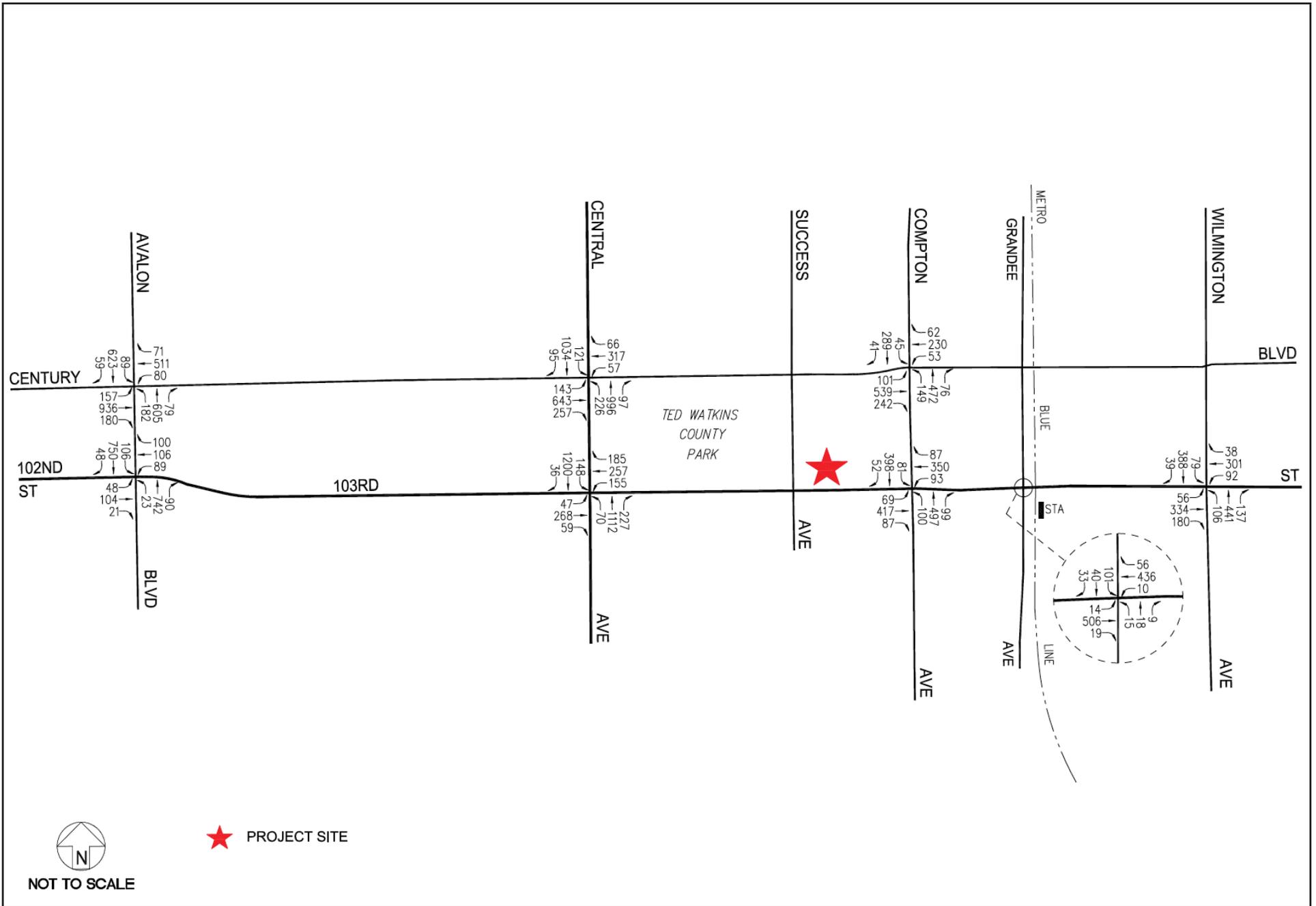
A forecast of on-street traffic conditions prior to occupancy of the Proposed Project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area. With this information, the potential impact of the Proposed Project can be evaluated within the context of the cumulative impact of all ongoing development. The related projects research was based on information on file at the City of Los Angeles Departments of Transportation and Planning. The list of related projects in the Project Site area is presented in Table II-4 in the Project Description Section, and the location of the related projects is shown in Figure II-10. Traffic volumes expected to be generated by the related projects were calculated using rates provided in the Institute of Transportation Engineers' (ITE) Trip Generation Manual. The distribution of the related projects traffic volumes to the study intersections during the weekday AM and PM peak hours are displayed in Figures 6-2 and 6-3 of the Traffic Study.



Source: Linscott, Law & Greenspan, Engineers, August 2017.



Figure III-4
Existing (2017) Traffic Volumes - AM Peak Hour



Source: Linscott, Law & Greenspan, Engineers, August 2017.

Ambient Traffic Growth Factor

In order to account for area-wide regional growth not included in this analysis, the existing traffic volumes were increased at an annual rate of 1.0 percent (1.0%) to the year 2020 (i.e., the anticipated year of project build-out). The ambient growth factor was based on general traffic growth factors provided in the 2010 Congestion Management Program for Los Angeles County (the “CMP manual”) and determined in consultation with LADOT staff. It is noted that the CMP manual’s traffic growth rate is intended to anticipate future traffic generated by development projects in the project vicinity. Thus, the inclusion in the Traffic Study of both a forecast of traffic generated by known related projects plus the use of an ambient growth traffic factor based on CMP traffic model data results in a conservative estimate of future traffic volumes at the study intersections.

Proposed Project Impacts

Proposed Project Site Access

Vehicular access to the Project Site would be provided via a new project driveway on Success Avenue. This Project driveway would be located on the east side of Success Avenue, south of the existing alleyway (i.e., along the westerly property frontage) at the northwest corner of the Project Site. The Success Avenue project driveway would provide access to the new subterranean parking garage to be constructed as part of the Proposed Project. Full access would be provided (i.e., right-turn and left-turn ingress and egress turning movements) at this Project driveway. The Success Avenue driveway would be constructed to City of Los Angeles design standards.

As noted previously, a new drop-off/pick-up zone along the north side of 103rd Street is planned to be provided as part of the Proposed Project. Patrons of the Proposed Project (i.e., both the medical office and learning/counseling center components) as well as the adjacent City buildings would be able to utilize the new drop-off/pick-up zone. The new drop-off/pick-up zone is planned to be 135 feet in length and would accommodate approximately five to six vehicles.

Pedestrian Access / Bicycle Access

The Proposed Project would be designed to encourage pedestrian activity and walking as a transportation mode. The Proposed Project is being designed to provide connections to the adjacent public sidewalks and would include site enhancements to promote walkability. The Project Site is accessible from nearby public bus transit stops and rail line stations as well as other amenities along nearby major corridors. The majority of pedestrian access to the Project Site is envisioned to occur via the existing public sidewalks provided along all roadways in the area.

Proposed bicycle facilities (e.g., Class I Bicycle Path, Class II Bicycle Lanes, Class III Bicycle Routes, Proposed Bicycle Routes, Bicycle Friendly Streets, etc.) in the City’s Mobility Plan 2035 (which includes the City’s 2010 Bicycle Plan) are located within an approximate one-mile radius from the Project Site. Three bicycle facilities in the City’s existing bicycle network are located within the immediate vicinity of the Project Site:

- Central Avenue: Class II (Bicycle Lane)
- Wilmington Avenue: Class II (Bicycle Lane)
- Century Boulevard: Class II (Bicycle Lane)

Use of bicycles as a transportation mode to and from the Project Site should be encouraged by the provision of ample and safe parking. The type of spaces and dimensions would be provided based on City Code requirements (refer to Los Angeles Municipal Code Sections 12.21.A.16 and 12.21.A.4(c)), as well as to meet the needs of a variety of bicycles.

Project Trip Generation

Traffic volumes expected to be generated by the Proposed Project during the weekday AM and PM peak hours, as well as on a daily basis, were estimated using rates published in the ITE Trip Generation Manual. Traffic volumes expected to be generated by the medical office and counseling center uses were based upon rates per 1,000 square feet of floor area. Traffic volumes expected to be generated by the learning center/preschool were based upon rates per number of students. Trip generation average rates for the following uses were used to forecast the traffic volumes expected to be generated by the Proposed Project:

- ITE Land Use Code 495: Recreational Community Center
- ITE Land Use Code 565: Day Care Center
- ITE Land Use Code 720: Medical-Dental Office

In addition to the above Project trip generation forecasts, a forecast was made of likely pass-by trips that could be anticipated at the Project Site for the proposed uses. Pass-by trips are intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from traffic passing the Project Site on an adjacent street or roadway that offers direct access to the Project Site. The pass-by traffic forecast has been estimated based on a review of the existing traffic volumes at the study intersections, the recommended practice in Appendix F of the ITE Trip Generation Handbook and the LADOT Policy on Pass-by Trips. Pass-by adjustments have been applied to the weekday AM and PM peak hour traffic volume forecasts, as well as to the daily traffic volume forecasts for the medical office component only. Additionally, a trip reduction adjustment was employed in the Project trip generation forecast to account for the proximity to the existing nearby Metro Blue Line transit station, as well as the high level of bus transit opportunities in the Project study area. Based on LADOT traffic study guidelines and discussions with LADOT staff, a transit trip reduction factor of 10 percent (10.0%) would be applicable to the medical office building and counseling center components of the Proposed Project based on the Project Site's proximity to the Metro Blue Line 103rd Street/Watts Tower station and other public bus transit routes in the area.

In addition to the Proposed Project trip generation forecasts, forecasts were also made for the existing land uses. ITE Land Use Code 565 (Day Care Center) trip generation average rates were used to forecast the traffic volumes expected to be generated by the existing counseling/learning center located on-site.

The trip generation forecast for the Proposed Project is summarized in Table III-23, Project Trip

**Table III-23
Project Trip Generation^a**

Description	Size	Daily Trip Volumes ^b	AM Peak Hour Volumes ^b			PM Peak Hour Volumes ^b		
			In	Out	Total	In	Out	Total
Proposed Uses								
Medical-Dental Office Building ^c	51,500 sf	1,861	97	26	123	52	132	184
-Less Pass-by Adjustment (10%) ^d		(186)	(10)	(3)	(13)	(5)	(13)	(18)
-Less Transit Adjustment (10%) ^e		(168)	(9)	(2)	(11)	(5)	(12)	(17)
Counseling Center ^f	19,000 sf	643	26	13	39	25	27	52
-Less Transit Adjustment (10%) ^d		(64)	(3)	(1)	(4)	(2)	(3)	(5)
Learning Center ^g	30 students	131	13	11	24	11	13	24
Subtotal Proposed Project:		2,217	114	44	158	76	144	220
Existing Uses								
Day Care Center ^g	22 students	(96)	(10)	(8)	(18)	(8)	(10)	(18)
Subtotal Existing Uses:		(96)	(10)	(8)	(18)	(8)	(10)	(18)
Net Increase in Trips:		2,121	104	36	140	68	134	202

Notes: sf = square feet
^a Source: ITE "Trip Generation Manual", 9th Edition, 2012.
^b Trips are one-way traffic movements, entering or leaving.
^c ITE Land Use Code 720 (Medical-Dental Office Building) trip generation average rates.
 -Daily Trip Rate: 36.13 trips/1,000 SF of floor area; 50% inbound/50% outbound
 -AM Peak Hour Trip Rate: 2.39 trips/1,000 SF of floor area; 79% inbound/21% outbound
 -PM Peak Hour Trip Rate: 3.57 trips/1,000 SF of floor area; 28% inbound/72% outbound
^d A transit trip reduction of 10 percent (10%) is employed based on the site's proximity to the existing bus transit lines and the nearby Metro Blue Line 103rd Street/Watts Tower station.
^e Source: LADOT policy on pass-by trip adjustments. Pass-by trips are made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from the traffic passing the site on an adjacent street or roadway that offers direct access to the site.
^f ITE Land Use Code 495 (Recreational Community Center) trip generation average rates.
 -Daily Trip Rate: 33.82 trips/1,000 SF of floor area; 50% inbound/50% outbound
 -AM Peak Hour Trip Rate: 2.05 trips/1,000 SF of floor area; 66% inbound/34% outbound
 -PM Peak Hour Trip Rate: 2.74 trips/1,000 SF of floor area; 49% inbound/51% outbound
^g ITE Land Use Code 565 (Day Care Center) trip generation average rates.
 -Daily Trip Rate: 4.38 trips/student; 50% inbound/50% outbound
 -AM Peak Hour Trip Rate: 0.80 trips/student; 53% inbound/47% outbound
 -PM Peak Hour Trip Rate: 0.81 trips/student; 47% inbound/53% outbound
 Source: Linscott, Law & Greenspan, Engineers, Traffic Impact Study, Kaiser Permanente Watts Learning Center & Health Pavilion Project, dated August 2, 2017.

Generation. The trip generation forecast for the Proposed Project was submitted for review and approval by LADOT staff. As presented in Table III-23, the Proposed Project is forecast to generate 141 net new vehicle trips (104 inbound trips and 37 outbound trips) during the AM peak hour and 202 net new vehicle trips (68 inbound trips and 134 outbound trips) during the PM peak hour. Over a 24-hour period, the Proposed Project is forecast to generate 2,121 net new daily trips during a typical weekday.

Traffic Impacts

Existing With Project Conditions

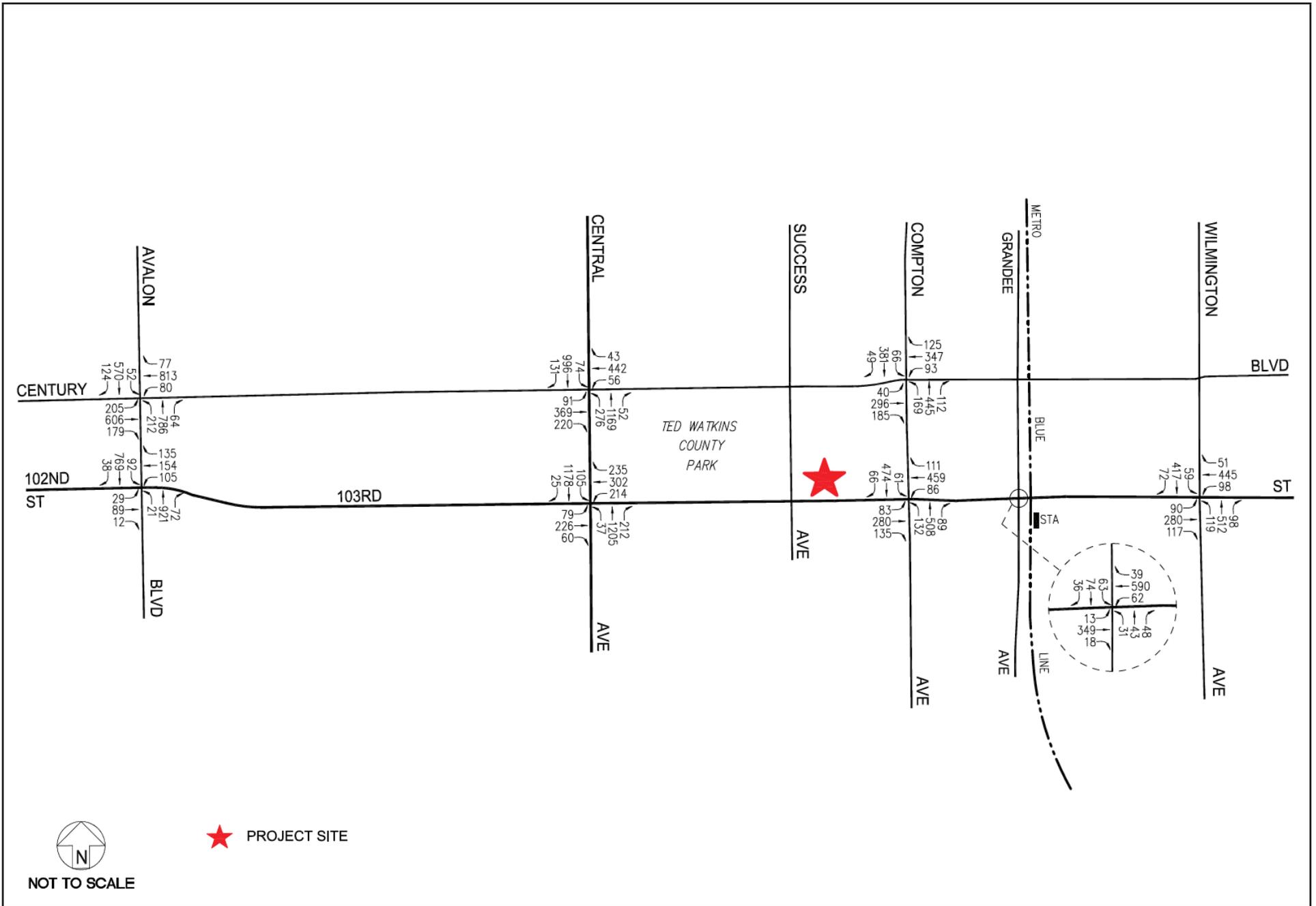
The Traffic Study prepared for the study intersections for the existing conditions using the CMA methodology and application of the City of Los Angeles significant traffic impact criteria is summarized in Table III-24. As indicated in Table III-24, seven of the eight study intersections are presently operating at LOS D or better during the weekday AM and PM peak hours under existing conditions. Study Intersection No. 3, Central Avenue & Century Boulevard is expected to operate at LOS E during the PM Peak Hour, with a V/C ratio of 0.913.

As shown in Table III-24, application of the City’s threshold criteria to the “Existing With Project” scenario indicates that the Proposed Project is not expected to create significant impacts at any of the eight study intersections. Incremental, but not significant, impacts are noted at the study intersections. Because there are no significant impacts, no traffic mitigation measures are required or recommended for the study intersections under the “Existing With Project” conditions. The Existing with Project traffic volumes at the study intersections during the weekday AM and PM peak hours are illustrated in Figure III-6 and Figure III-7, respectively.

Table III-24
Existing (2017) With Project – Summary of Volume to Capacity Ratios and Levels of Service

No.	Intersection	Peak Hour	Existing (2017)		Existing With Project (2017)		Change in V/C	Significant Impact?
			V/C	LOS	V/C	LOS		
1.	Avalon Boulevard & Century Boulevard	AM	0.776	C	0.779	C	0.003	No
		PM	0.744	C	0.749	C	0.005	No
2.	Avalon Boulevard & 102 nd -103 rd Street	AM	0.420	A	0.430	A	0.010	No
		PM	0.391	A	0.401	A	0.010	No
3.	Central Avenue & Century Boulevard	AM	0.842	D	0.847	D	0.005	No
		PM	0.913	E	0.918	E	0.005	No
4.	Central Avenue & 103 rd Street	AM	0.779	C	0.783	C	0.004	No
		PM	0.695	B	0.709	C	0.014	No
5.	Compton Avenue and Century Boulevard	AM	0.427	A	0.427	A	0.000	No
		PM	0.460	A	0.460	A	0.000	No
6.	Compton Avenue & 103 rd Street	AM	0.637	B	0.665	B	0.028	No
		PM	0.565	A	0.576	A	0.011	No
7.	Grandee Avenue & 103 rd Street	AM	0.251	A	0.261	A	0.010	No
		PM	0.212	A	0.224	A	0.012	No
8.	Wilmington Avenue & 103 rd Street	AM	0.665	B	0.671	B	0.006	No
		PM	0.531	A	0.539	A	0.008	No

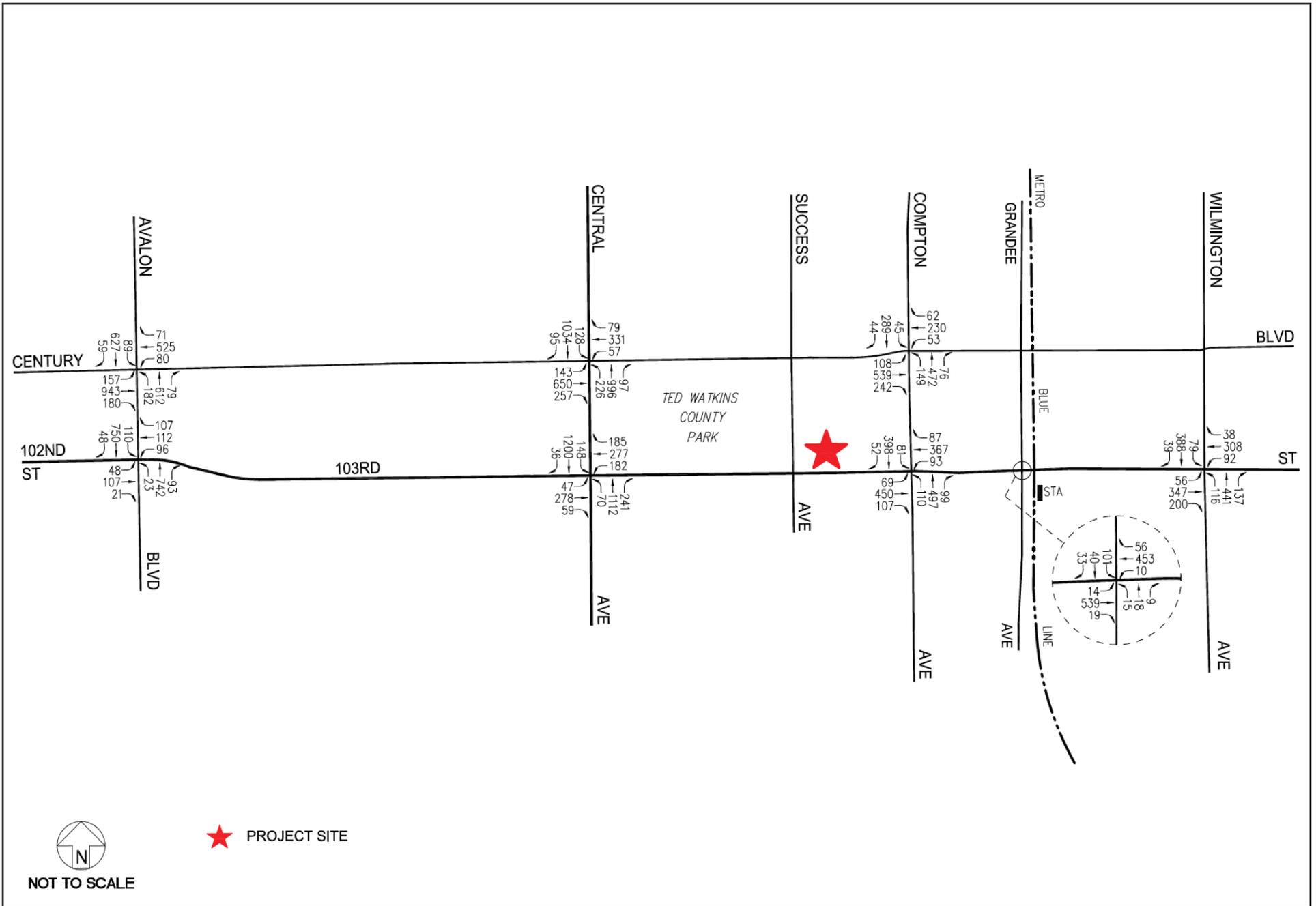
Source: Linscott, Law & Greenspan, Engineers, Traffic Impact Study, Kaiser Permanente Watts Learning Center & Health Pavilion Project, dated August 2, 2017.



Source: Linscott, Law & Greenspan, Engineers, August 2017.



Figure III-6
Existing (2017) with Project Traffic Volumes - AM Peak Hour




 NOT TO SCALE

 PROJECT SITE

Source: Linscott, Law & Greenspan, Engineers, August 2017.



Figure III-7
Existing (2017) with Project Traffic Volumes - PM Peak Hour

Future Conditions

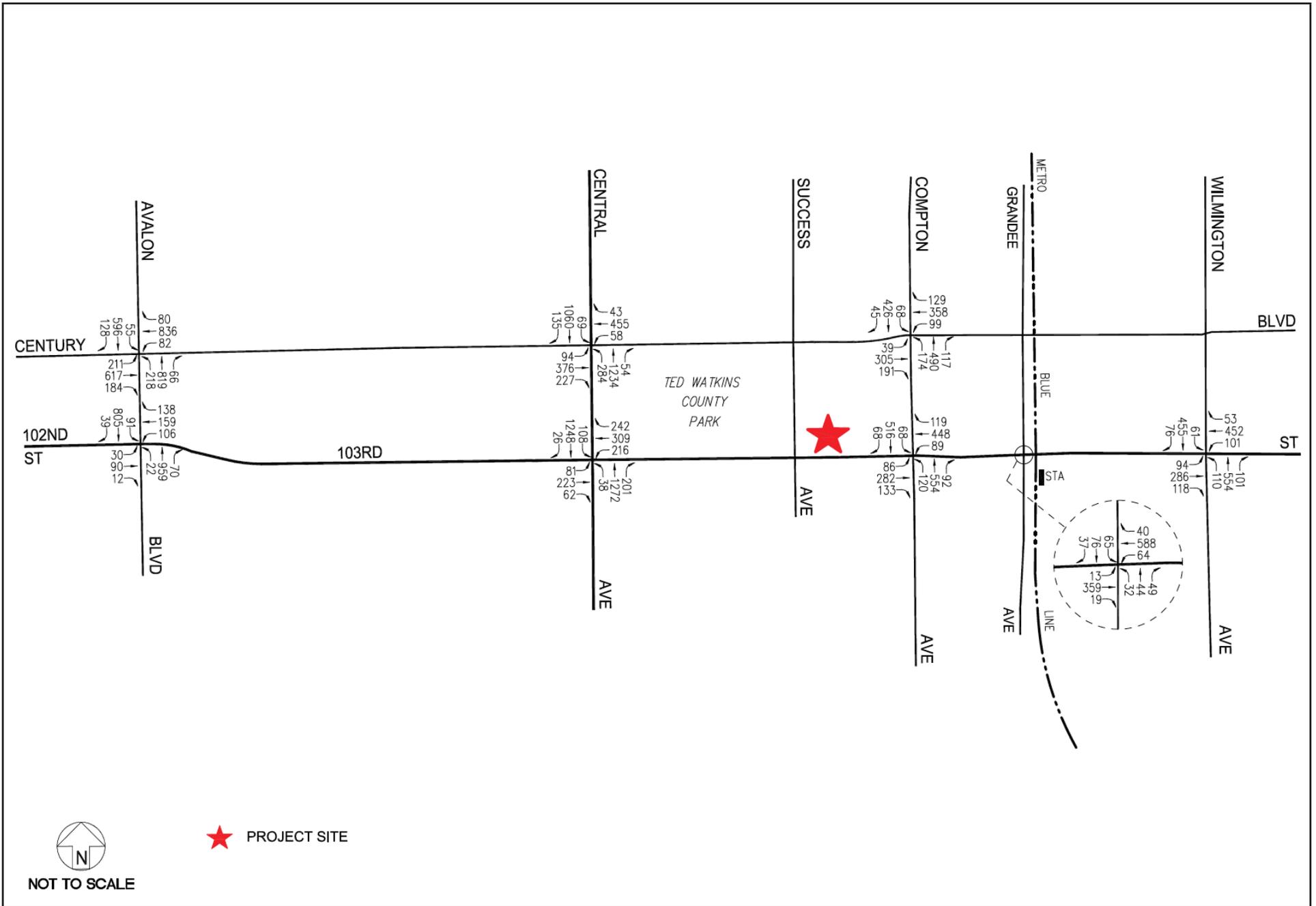
The future cumulative baseline conditions were forecast based on the addition of traffic generated by the completion and occupancy of the related projects, as well as the growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors (i.e., ambient growth). The V/C ratios at all of the study intersections are incrementally increased with the addition of ambient traffic and traffic generated by the related projects. As presented in Table III-25, seven of the eight study intersections are expected to continue to operate at LOS D or better during the weekday AM and PM peak hours with the addition of growth in ambient traffic and related projects traffic under the Future Without Project conditions. Study Intersection No. 3, Central Avenue & Century Boulevard, is expected to operate at LOS E during the PM Peak Hour with the addition of growth in ambient traffic and related projects traffic. The Future Without Project (existing, ambient growth and related projects) traffic volumes at the study intersections during the weekday AM and PM peak hours are presented in Figure III-8 and Figure III-9.

As shown in Table III-25, application of the City’s threshold criteria to the “With Proposed Project” scenario indicates that the Proposed Project is not expected to create significant impacts at the eight study intersections. Incremental, but not significant, impacts are noted at the study intersections. Because there are no significant impacts, no traffic mitigation measures are required or recommended for the study intersections under the “Future With Project” conditions. The Future With Project (existing, ambient growth, related projects and project) traffic volumes at the study intersections during the weekday AM and PM peak hours are illustrated in Figure III-10 and Figure III-11, respectively.

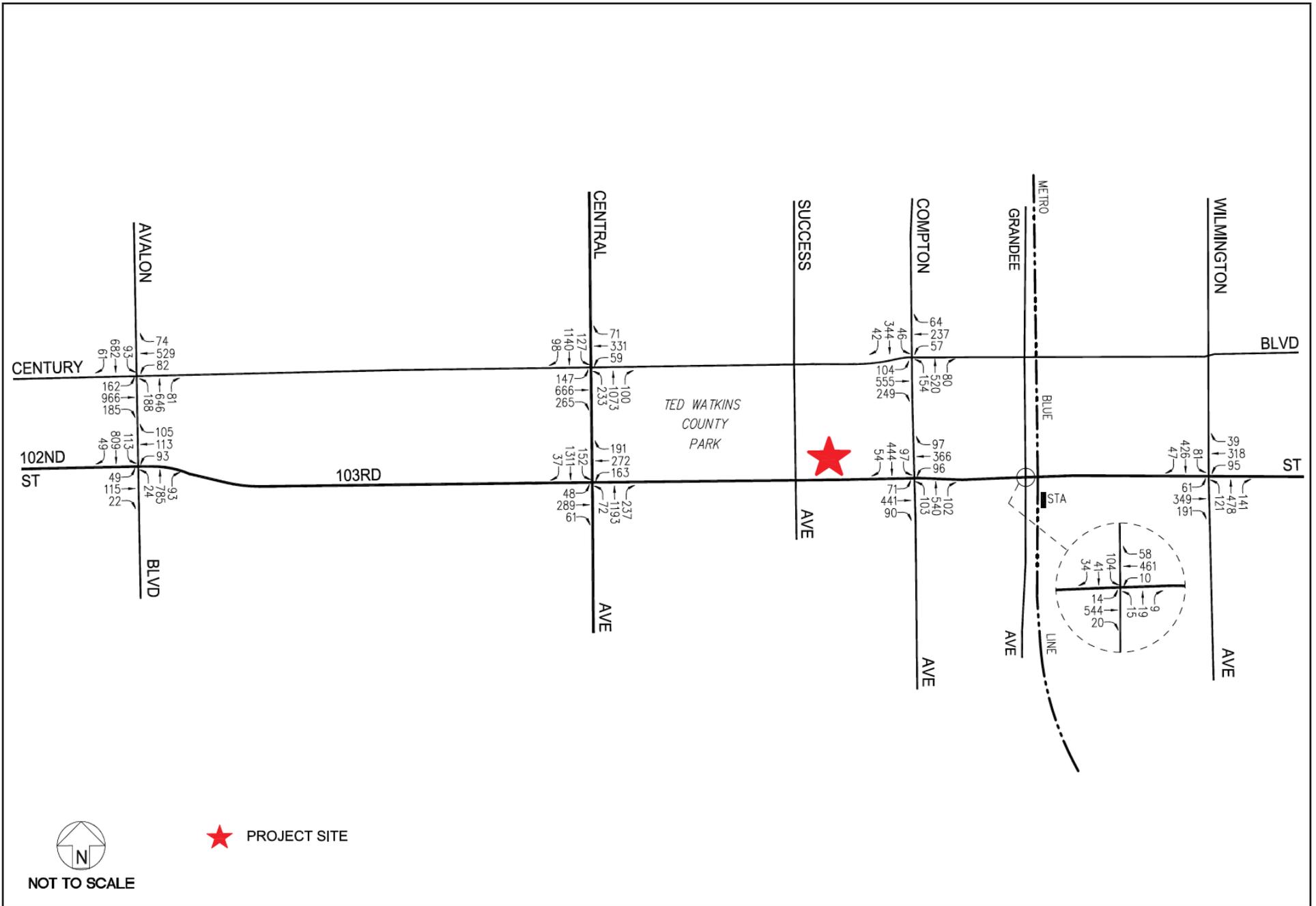
**Table III-25
Future (2020) With Project – Summary of Volume to Capacity Ratios and Levels of Service**

No.	Intersection	Peak Hour	Future w/o Project (2020)		Future with Project (2020)		Change in V/C	Significant Impact?
			V/C	LOS	V/C	LOS		
1.	Avalon Boulevard & Century Boulevard	AM	0.808	D	0.812	D	0.004	No
		PM	0.786	C	0.789	C	0.003	No
2.	Avalon Boulevard & 102 nd -103 rd Street	AM	0.443	A	0.452	A	0.009	No
		PM	0.421	A	0.432	A	0.011	No
3.	Central Avenue & Century Boulevard	AM	0.887	D	0.892	D	0.005	No
		PM	0.972	E	0.977	E	0.005	No
4.	Central Avenue & 103 rd Street	AM	0.817	D	0.821	D	0.004	No
		PM	0.740	C	0.753	C	0.013	No
5.	Compton Avenue and Century Boulevard	AM	0.468	A	0.468	A	0.000	No
		PM	0.501	A	0.501	A	0.000	No
6.	Compton Avenue & 103 rd Street	AM	0.680	B	0.708	C	0.028	No
		PM	0.616	B	0.627	B	0.011	No
7.	Grande Avenue & 103 rd Street	AM	0.264	A	0.273	A	0.009	No
		PM	0.229	A	0.241	A	0.012	No
8.	Wilmington Avenue & 103 rd Street	AM	0.709	C	0.716	C	0.007	No
		PM	0.569	A	0.577	A	0.008	No

Source: Linscott, Law & Greenspan, Engineers, Traffic Impact Study, Kaiser Permanente Watts Learning Center & Health Pavilion Project, dated August 2, 2017.



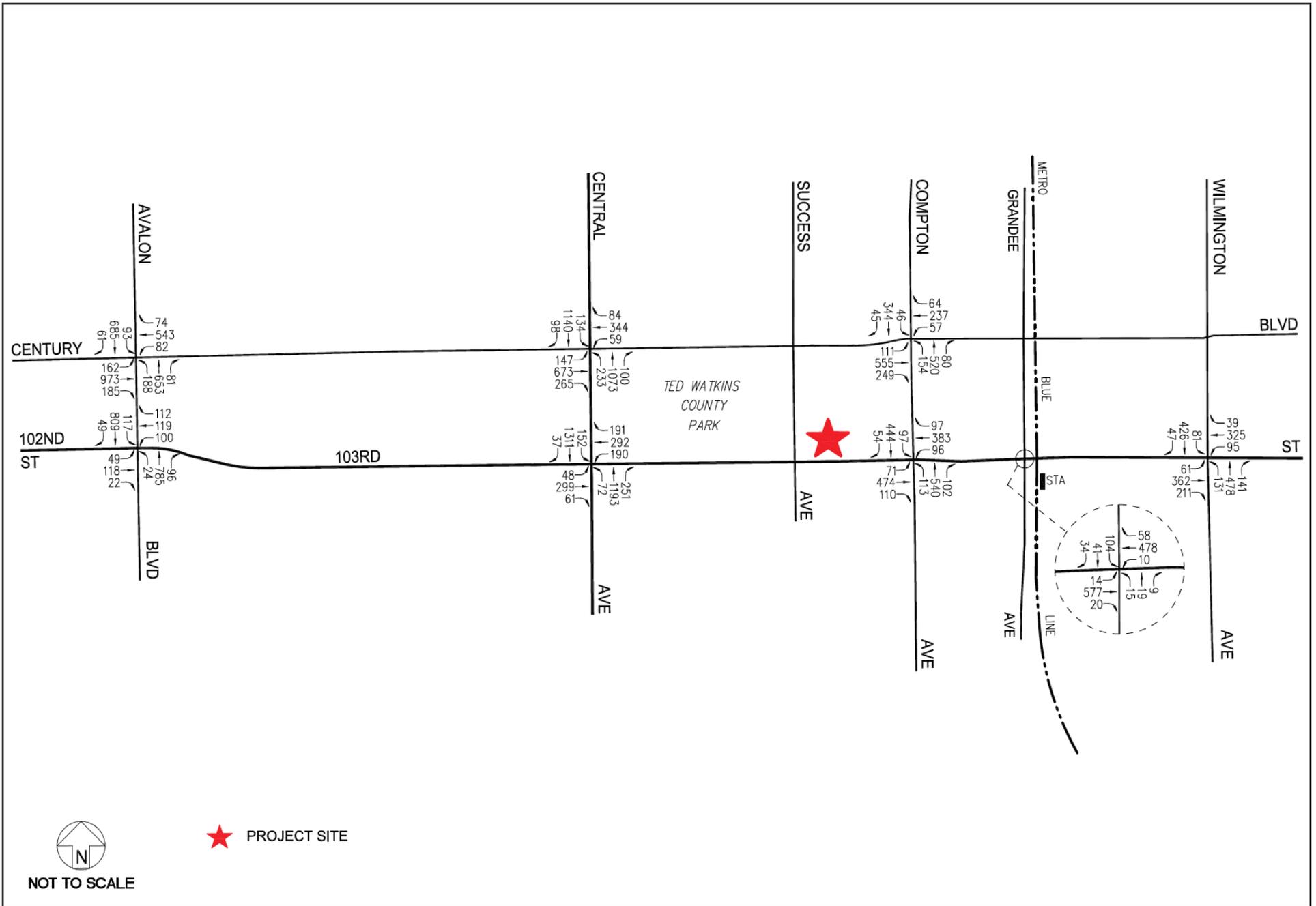
Source: Linscott, Law & Greenspan, Engineers, August 2017.



Source: Linscott, Law & Greenspan, Engineers, August 2017.



Figure III-9
Future (2020) Without Project Traffic Volumes - PM Peak Hour



Source: Linscott, Law & Greenspan, Engineers, August 2017.



Figure III-11
 Future (2020) with Project Traffic Volumes - PM Peak Hour

Construction Traffic

The Applicant would attempt to park and stage for construction on-site as much as possible. During periods of time where off-site street surfaces are needed, such as during garage excavation, the Applicant will submit for review and approval a traffic control plan detailing days, time of day, and safety features. Any off-site construction needs will be minimized and conducted outside of peak traffic times. Deliveries of construction material will be coordinated to non-peak travel periods, to the extent possible. Construction worker vehicles that cannot be accommodated on site will be provided off-street parking and encouraged to use public transit services and/or shuttle service to the site, if needed.

Additionally, the Proposed Project would require the use of haul trucks during the demolition, site clearing, and excavation, and the use of a variety of other construction vehicles throughout the construction of the Proposed Project. The Proposed Project would require approximately 40,500 cy of soil of excavated soil to be exported off site. The local haul route traveling to and from the deposit sites would utilize 103rd Street, Wilmington Avenue, the Imperial Highway ramp to the 105 Freeway (when traveling westbound), and the Wilmington Avenue ramp to the 105 Freeway (when traveling eastbound). The haul route specified above may be modified in compliance with applicable City policies, provided DOT and/or Street Services approves any such modification.

The haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the Department of Building and Safety. The addition of these vehicles onto the street system would contribute to increased traffic in the Project vicinity. However, the Proposed Project's construction trip traffic would be a fraction of the operational traffic that would not cause any significant impacts at the studied intersections. Therefore, it is not anticipated that this would contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction. The Proposed Project would implement all Proposed Project requirements listed in the LADOT Correspondence Letter to ensure any Project impacts with respect to highway dedication/physical street improvements, site access and internal circulation, construction impacts, and development review fees are less than significant (See Mitigation Measure T-1). Due to the temporary nature of the traffic, construction impacts would be less than significant with the incorporation of Mitigation Measure T-2 and T-3, below.

Mitigation Measures:**T-1 Compliance with LADOT**

- Implementing measure(s) detailed in the Department of Transportation's communication to the Planning Department (DOT Case No. HRB17-105790), dated August 23, 2017 and attached shall be complied with. Such report and mitigation measure(s) are incorporated herein by reference.

T-2 Construction Management Plan

A Construction Management Plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The Construction Management Plan would include the following elements:

- All construction related traffic shall be restricted to off-peak hours.
- Construction parking would be located on-site, within adjacent lots, street, and underground parking garage so as not to disrupt on-going traffic along 103rd Street.
- The construction site entrance/exit would be located on Success Avenue.
- All delivery truck loading and unloading shall take place on site or within the boundaries of an approved traffic control plan in order to reduce the effect of traffic flow on surrounding arterial streets.
- The sidewalk along 103rd Street shall be covered with lighting for safe pedestrian access. The pedestrian sidewalk along Success Avenue would be temporarily closed during construction. The Applicant shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.

T-3 Transportation Haul Route

The Transportation Haul Route shall include the following elements:

- The Applicant shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- The loading and staging area shall be located on the Project Site near the proposed construction entrance/exit, and there shall be no staging of hauling trucks on any streets adjacent to the Project Site.
- No hauling shall be done before 9 A.M. and after 3 P.M.
- Trucks shall be spaced so as to discourage a convoy effect.
- A minimum of two flag persons are required. One flag person is required at the entrance to the Project Site and one flag person at the next intersection along the haul route.
- Truck crossing signs are required within 300 feet of the exit of the Project Site in each direction.
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times shall provide reasonable control of dust caused by wind.
- Loads shall be secured by trimming and watering or may be covered to prevent the spilling or blowing of the earth material.
- Trucks and loads are to be cleaned at the export site to prevent blowing dirt and spilling of loose earth.

- A log documenting the dates of hauling and the number of trips (i.e. trucks) per day shall be available on the job site at all times.
- The Applicant shall identify a construction manager and provide a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading and construction.

b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. A significant impact would occur if the Proposed Project conflicts with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. The traffic impact guidelines of the current 2010 Congestion Management Plan (“CMP”) for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed.

The nearest CMP arterial monitoring location to the Project Site is CMP Station No. 51, the intersection of Avalon Boulevard and Manchester Avenue. The Proposed Project would not add 50 or more trips during either the weekday AM or PM peak hours (i.e., of adjacent street traffic) at CMP monitoring intersections, as stated in the CMP manual as the threshold criteria for preparation of a traffic impact assessment. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

The nearest CMP freeway monitoring location to the Project Site is Segment No. 1043, the Interstate 105 Freeway, west of Interstate 710 Freeway. The Proposed Project would not add 150 or more trips (in either direction) during either the weekday AM or PM peak hours to CMP freeway monitoring locations which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required.

As such, the Proposed Project would not conflict with the adopted CMP and impacts would be less than significant.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to the Proposed Project only if it involved an aviation-related use or would influence changes to existing flight paths. The Proposed Project does not include any aviation-related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in Los Angeles. Therefore, no impact would occur.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. A significant impact may occur if the Proposed Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if Project Site access or other features were designed in such a way as to create hazard conditions. The Proposed Project would not include unusual or hazardous design features. Primary access would be provided via Success Avenue. The Proposed Project would eliminate the existing driveways along 103rd Street, which is classified as a Collector Street and would provide a new driveway along Success Avenue, which is classified as a Local Street in the Mobility Plan. The Proposed Project would not introduce new vehicular access driveways that could potentially conflict with pedestrian circulation and traffic. Therefore, the Proposed Project would not substantially increase hazards due to design features or incompatible uses, and a less than significant impact would occur.

e) Would the project result in inadequate emergency access?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses.

As previously discussed in Section VIII(g), the Proposed Project is located on a disaster route along 103rd Street in the City's Safety Element. Development of the Project Site may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Therefore, the impacts to vehicle and pedestrian circulation during construction would be reduced to less than significant with implementation of Mitigation Measure T-1 and T-2.

As described in Section XIV(a), the Proposed Project would satisfy the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. Furthermore, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Therefore, the Proposed Project would not be expected to result in inadequate emergency access, and impacts would be less than significant.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. A significant impact may occur if the Proposed Project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

As required by the 2010 Congestion Management Program, a review has been made of the potential impacts of the Proposed Project on transit service. The Project trip generation was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the Proposed Project is forecast to generate demand for 7 transit trips during the weekday AM peak hour and 10 transit trips during the weekday PM peak hour. Over a 24-hour period, the Proposed Project is forecast to generate demand for 104 weekday daily transit trips.

As provided in the Traffic Study, 11 transit lines and routes are provided adjacent to or in close proximity to the Project Site. These 11 transit lines provide services for an average of (i.e., average of the directional number of buses/trains during the peak hours) roughly 117 and 114 buses/trains during the weekday AM and PM peak hours, respectively. Therefore, based on the above calculated weekday AM and PM peak hour trips, this would correspond to less than one additional transit rider per bus/train. It is anticipated that the existing transit service in the Project area would adequately accommodate the increase of Project-generated transit trips. Thus, given the number of Project-generated transit trips per bus/train, no Project impacts on existing or future transit services in the Project area are expected to occur as a result of the Proposed Project.

The Proposed Project would not require the disruption of public transportation services or the alteration of public transportation routes. The Proposed Project would not interfere with any class I or class II bikeway systems. The Project Site is located in a highly urbanized area within a Transit Priority Area (as defined by CEQA). The Proposed Project would develop new medical office space and a counseling and learning center in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within a ½ mile of the 103rd Street/Watts Towers Station and numerous bus routes with peak commute service intervals of 15 minutes or less. Additionally, the Proposed Project would provide the required bicycle parking spaces on-site. The location of the Proposed Project encourages a variety of transportation options. Furthermore, Mitigation Measure T-2 would reduce to impacts associated with vehicle and pedestrian circulation during construction to a less than significant level. Since the Proposed Project would not modify or conflict with any alternative transportation policies, plans or programs, or safety of such facilities, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 12 related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Southeast Los Angeles Community Plan Area and the County of Los Angeles. As noted in Table III-25,

Future With Project – Summary of Volume to Capacity Ratios and Levels of Service, all increases in V/C ratios in the AM peak hour and PM peak hour would be less than the threshold for a significant impact to occur, and the Proposed Project's contribution to cumulative impacts is less than significant for all of the study intersections analyzed. Therefore, the Proposed Project's cumulative impact is considered less than significant.

XVII. TRIBAL CULTURAL RESOURCES

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

Less Than Significant Impact. Pursuant to AB 52, the Department of City Planning sent pre-consultation request letters to the recognized Native American Tribal Representatives within the Los Angeles region on December 22, 2017. A response for a consultation was received from the Gabrielleno Band of Mission Indians-Kizh Nation (Tribal Group). On January 18, 2018, a request to schedule the consultation was sent to the Tribe, however as of February 22, 2018, no response has been received. The response letter from the Tribal Group did not indicate that there were known resources on the subject site. Therefore, because the Project Site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known cultural resources, adherence to the regulatory compliance measures referenced in Question V (b) and (d) in the Cultural Resources Section for archeological resources and human remains would ensure impacts associated with the accidental discovery of any archaeological resources or human remains, including Native American resources would be avoided or reduced to less than significant levels.

- 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.**

Less Than Significant Impact. As discussed above, pursuant to AB 52, the Department of City Planning sent pre-consultation request letters to the recognized Native American Tribal Representatives within the Los Angeles region on December 22, 2017. A response for a consultation was received from the

Gabrielleno Band of Mission Indians-Kizh Nation (Tribal Group). On January 18, 2018, a request to schedule the consultation was sent to the Tribe, however as of February 22, 2018, no response has been received. The response letter from the Tribal Group did not indicate that there were known resources on the subject site. Therefore, because the Project Site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known cultural resources, adherence to the regulatory compliance measures referenced in Question V (b) and (d) in the Cultural Resources Section for archeological resources and human remains would ensure impacts associated with the accidental discovery of any archaeological resources or human remains, including Native American resources would be avoided or reduced to less than significant levels.

XVIII. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The Los Angeles RWQCB (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the Project area.

Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Water Reclamation Plant (HWRP). The HWRP is a public facility and is subject to the State's wastewater treatment requirements. Wastewater from the Project Site is and would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB. Therefore, impacts associated with wastewater treatment requirements would be less than significant.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project

buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP’s Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).⁴² The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.

As shown in Table III-26 below, the Proposed Project would generate a net increase in water demand of approximately 21,888 gallons per day (gpd) of water, significantly below available capacity. Because the Proposed Project would be consistent with the zoning and General Plan land use designations upon approval, and the Proposed Project’s employment growth would be within SCAG’s forecast, the Proposed Project’s increased water demand would not measurably reduce the LAAFP’s treatment capacity; therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Proposed Project would have a less-than-significant impact.

**Table III-26
Proposed Project Estimated Water Demand**

Type of Use	Size	Water Demand Rate (gpd/unit) ^a	Total Water Demand (gpd)
Proposed Project			
Medical Office / Counseling and Learning Center	72,960 sf ^b	300 gpd / 1,000 sf	21,888
Total Project Water Demand:			21,888
<i>Notes: sf =square feet; gpd: gallons per day</i> ^a Consumption Rates based on 120% of the City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, April 6, 2012. ^b The Sewer Capacity Availability Request (SCAR) requested approval of a 72,960 square-foot building (See Appendix K of this IS/MND). Parker Environmental Consultants, 2017.			

⁴² Los Angeles Department of Water and Power, website: <http://wsoweb.ladwp.com/Aqueduct/historyoflaa/waterquality.htm>, accessed July 2017.

The LADWP should be able to provide the commercial needs of the Proposed Project from the existing water system. Although no system upgrades are anticipated at this time, the water system would be verified again at the time of construction. In the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer’s capacity is already constrained or that would cause a sewer’s capacity to become constrained; or (b) the project’s additional wastewater flows would or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

The Los Angeles Bureau of Sanitation (BOS) provides sewer service to the Proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.⁴³ This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. As shown in Table III-27, the Proposed Project would generate a net increase of approximately 18,240 gpd of wastewater, representing a fraction of one percent of the available capacity.

**Table III-27
Proposed Project Estimated Wastewater Generation**

Type of Use	Size	Wastewater Generation Rate (gpd/unit) ^a	Total Wastewater Generation (gpd)
Proposed Project			
Medical Office / Counseling and Learning Center	72,960 sf ^b	250 gpd / 1,000 sf	18,240
Total Project Wastewater Generation:			18,240
<i>Notes: sf =square feet; gpd=gallons per day</i> ^a City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, April 6, 2012. ^b The Sewer Capacity Availability Request (SCAR) requested approval of a 72,960 square-foot building (See Appendix K of this IS/MND). Parker Environmental Consultants, 2017.			

⁴³ City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: <https://www.lacitysan.org/>, accessed July 2017.

The Project Site is currently served by an 8-inch sewer pipe along the adjacent alleyway, which is owned and operated by the City of Los Angeles.⁴⁴ The Proposed Project's operation would divert all sewage generation to this sewer pipeline. Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the Bureau of Sanitation will verify the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. If it is later determined that the local sewer system has insufficient capacity to serve the Proposed Project, the Applicant would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate the Proposed Project's increased flows. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right-of way. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities. As described in Question IX(c), the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Proposed Project would be required to demonstrate compliance with Low Impact Development Ordinance standards and retain or treat the first ¼-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. The Project Site is currently developed with a vacant fire station, a vacant library, a counseling and learning center, and surface parking. Aside from a few on-site trees, the Project Site is almost completely covered with impervious surfaces. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in response to Checklist Question IX(a), the Proposed Project shall comply with NPDES requirements and the LID regulations, and implement BMPs during the construction and operation of the Proposed Project.

The appropriate design and application of Best Management Practices (BMP) devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. Thus, development of the Proposed Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, Project impacts would be considered less than significant.

⁴⁴ *City of Los Angeles, Department of Public Works, Bureau of Engineering, NavigateLA, website: <http://navigate.lacity.org/navigate/>, accessed July 2017.*

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table III-26, the Proposed Project's net increase in water demand would be 21,888 gallons per day. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040, with implementation of conservation strategies and proper supply management. Accordingly, the Proposed Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2015 UWMP. Thus, the Proposed Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, water saving showerheads, and low flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184248, Los Angeles Ordinance No. 184,692, the 2017 Los Angeles Plumbing Code, the 2016 California Green Building Standards Code (CAL Green), and the 2017 Los Angeles Green Building Code. With respect to landscaping, the Proposed Project would be required to comply with Los Angeles City Ordinance No. 170978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

The City of Los Angeles has enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance. Compliance with the regulatory compliance measures identified above would reduce the Proposed Project's demands for potable water resources to a less than significant level.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project, related projects and the cumulative growth throughout the City of Los Angeles and County of Los Angeles, would further increase the demand for potable water within the City and County regions. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. As discussed previously in Section XIII, Population and Housing, the Proposed Project's employment growth is consistent with SCAG's growth projections for the City of Los Angeles subregion. Upon approval of a zone change and land use designation change, the Proposed Project would be consistent with the underlying allowable uses per the Southeast Los Angeles Community Plan and the LAMC and would not exceed the allowable density for the Project Site. As such, the additional water demands generated by the Proposed Project are accounted for in the 2015 Urban Water Management Plan, and cumulative impacts would be less than significant.

- e) **Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As stated in Checklist Question XVIII(b), above, the sewage flow would ultimately be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Proposed Project. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase local and regional demands on the HWRP's capacity.

Local Wastewater Generation

Each related project within the City of Los Angeles would be required to submit a Sewer Capacity Availability Request (SCAR) and obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. With approval of adequate sewer capacity from the Bureau of Sanitation, the Proposed Project would not be expected to contribute to a local cumulative impact. Locally, the Proposed Project would not be cumulatively considerable.

Regional Wastewater Generation

The Integrated Resources Plan, adopted in 2006, incorporates a new City-prepared Wastewater Facilities Plan to address demand and capacity through 2020. The Integrated Resources Plan serves to update the information prepared in the 1991 Wastewater Facilities Plan, while also considering the needs of the City's recycled water and urban runoff systems. Specifically, the Integrated Resources Plan was developed to accommodate the projected increase in wastewater flow over the next 20 years while maximizing the beneficial reuse of recycled water and urban runoff and, as a result, optimizing the use of the City's existing facilities and water resources. Growth projections and data sources used in the Integrated Resources Plan were based on the Southern California Association of Governments (SCAG) 2001 Regional Transportation Plan, which estimated that the population of Los Angeles would reach almost 4.3 million people by 2020. Implementation of the Integrated Resources Plan will enable the City to adequately convey wastewater to the treatment plants with minimal potential for sewage spills. It will also enable the City to treat future wastewater flows while protecting public health and safety and meeting regulatory requirements, thereby protecting the environment and surface waters. As discussed in Section XIII, Population and Housing, the cumulative growth impacts for the Proposed Project and related projects would be consistent with the SCAG's growth projections.

Based on continued implementation of the Integrated Resources Plan and the anticipated cumulative wastewater generation forecasted for the region, the demands of the Proposed Project and related projects in relation to wastewater treatment, when considered cumulatively, would result in less than significant impacts.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction,

and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030.⁴⁵ State law (AB 341) currently requires at least 50% solid waste diversion and establishes a state-wide goal of not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.⁴⁶

Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of

⁴⁵ *City of Los Angeles, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015.*

⁴⁶ *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

72.6 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 22 years. The Chiquita Canyon Landfill has a remaining capacity of 758,146 tons.⁴⁷ For the past decade, Chiquita Canyon Landfill has been working with the County of Los Angeles on an Environmental Impact Report (EIR) and a new Conditional Use Permit (CUP) application. During this period, the Chiquita Canyon Landfill reached the permitted disposal limit of 23 millions tons that was approved in 1997. The Director of Regional Planning granted Chiquita Canyon Landfill a limited waiver to continue operation of the landfill until necessary public hearings for the EIR and new CUP are completed. If the new CUP is not approved, then the landfill would close. The Proposed Project would be allowed to dispose solid waste at the Chiquita Canyon Landfill during the EIR and CUP process given that the landfill would not be required to close.⁴⁸ An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 48,114,000 tons (a 45-year life expectancy based on 2015 average daily disposal of 3,446 tons per day or 15 years based on the maximum permitted rate of disposal of 10,000 tons per day).⁴⁹

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. Based on the demolition of existing structures (approximately 15,000 square feet) and the development size of 60,000 square feet of the new building, 5,046 square feet of rehabilitated space in the fire station, and a 2,160 square-foot administrative trailer, it is estimated that the demolition and construction for the Proposed Project would generate approximately 1,294 tons of debris during the demolition and construction process (see Table III-28). In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the Bureau of Sanitation.

As shown in Table III-29, Proposed Project Estimated Operational Solid Waste Generation, the Proposed Project's net generation during operation would be 333 pounds per day. However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste collection services. The amount of solid waste generated

⁴⁷ *County of Los Angeles Department of Public Works, 2015 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, December 2016.*

⁴⁸ *Chiquita Canyons, "Chiquita Canyon Granted Waiver, Continues Operations" August 5, 2016. Website: <http://chiquitacanyon.com/chiquita-canyon-granted-waiver-continues-operations/>, accessed May 2017.*

⁴⁹ *Ibid.*

**Table III-28
Estimated Construction and Demolition Debris**

Construction Activity	Size	Rate ^a (lbs./sf)	Generated Waste (tons)
Demolition (Approximate)			
Existing Uses (Non Residential)	15,000 sf	155 lbs/sf	1,163
Total Project Demolition Debris Generation:			1,163
Construction ^b			
Medical Office / Counseling and Learning Center	60,000 sf	3.89 lbs/sf	117
Fire Station Tenant Improvement	5,046 sf	3.89 lbs/sf	10
Administrative Trailer	2,160 sf	3.89 lbs/sf	4
Total Project Construction Debris Generation:			131
Proposed Project NET TOTAL:			1,294
<p><i>Notes:</i> ^a <i>USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.</i> ^b <i>For a conservative analysis, the entirety of the Proposed Project's square footage was used to calculate construction debris. The calculations do not take into account the existing square footage that would be rehabilitated as part of the Proposed Project.</i> <i>Source: Parker Environmental Consultants, 2017.</i></p>			

**Table III-29
Proposed Project Estimated Operational Solid Waste Generation**

Type of Use	Size	Solid Waste Generation Rate ^a (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses			
Counseling and Learning Center	10,604 sf	0.006 lbs/sf/day	64
Proposed Project			
Medical Office	36,500 sf	0.007 lbs/sf/day	256
Counseling and Learning Center	23,500 sf	0.006 lbs/sf/day	141
Total Project Solid Waste Generation:			397
<i>Less Existing Uses:</i>			<i>-64</i>
NET TOTAL Solid Waste Generation:			333
<p><i>Notes:</i> ^a <i>L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.</i> <i>Source: Parker Environmental Consultants, 2017.</i></p>			

by the Proposed Project is within the available capacities at area landfills and project impacts to regional landfill capacity would be less than significant. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services. Mandatory recycling of organic waste is the next step toward achieving California's recycling and greenhouse gas emission goals. Organic waste such as green materials and food materials are recyclable through composting and mulching, and through anaerobic digestion, which can produce renewable energy and fuel. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

The Proposed Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Proposed Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development

projects include an on-site recycling area or room of specified size. The Proposed Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. Based on the 2015 CIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2030 will not exceed the 2015 remaining permitted Class III landfill capacity of 114 million tons.⁵⁰ However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the Countywide Integrated Waste Management Plan – Los Angeles County – Countywide Summary Plan and Citing Element (adopted December 2016) demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

Furthermore, it should be noted that the City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with Proposed Project is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's SRRE.

As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.⁵¹ Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. These programs include Green Mulching and Composting workshops, back yard

⁵⁰ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.

⁵¹ City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.

trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Proposed Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Therefore, the Proposed Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

No Impact. A significant impact may occur only if the Proposed Project would have an identified potentially significant impact for any of the above issues. The Proposed Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources and less-than-significant cultural resource impacts with implementation of regulatory compliance measures as identified within this expanded Initial Study / Mitigated Negative Declaration analysis. The Proposed Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, no impact would occur.

- 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)?**

Less Than Significant Impact. A significant impact may occur if the Proposed Project, in conjunction with the related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

As concluded in this analysis, the Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural quality, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. As such, the Proposed Project's contribution to cumulative impacts would be less than significant.

c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less-than-significant levels through the implementation of the applicable mitigation measures identified within this expanded Initial Study / Mitigated Negative Declaration analysis.

APPENDIX F: ENERGY CONSERVATION

Appendix F: Energy Conservation of the State CEQA Guidelines states the goal of conserving energy implies the wise and efficient use of energy. The State CEQA Guidelines outlines three means to achieve this goal:

1. Decreasing overall per capita energy consumption,
2. Decreasing reliance on fossil fuels such as coal, natural gas and oil, and
3. Increasing reliance on renewable energy sources.

The Proposed Project would develop a mixed-use building on an infill site, which would contribute to the revitalization of the Central City Community Plan area. As a mixed-use project, with both residential and commercial land uses, the Proposed Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards for Residential and Nonresidential Buildings located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," which was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2016 Standards will continue to improve upon the 2013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The effective date of the 2016 Standards is January 1, 2017.⁵² The Energy Efficiency Standards are a specific response to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Proposed Project includes energy efficiency components to conserve energy, which are detailed below.

⁵² *California Energy Commission, 2016 Building Energy Efficiency Standards, website: <http://www.energy.ca.gov/title24/2016standards/>, accessed May 2017.*

Existing Infrastructure

The Project Site is located in an urbanized area in Southeast Los Angeles area. The surrounding area is served by underground and aboveground circuits. Since the Proposed Project would revitalize the Project Site by rehabilitating the vacant fire station, replacing the vacant library, and expanding the on-site counseling and learning center, the Proposed Project would require on-site transformation and would require line extensions on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant.

Electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system.

Energy Consumption

a) Construction

Energy would be consumed during the demolition, site clearing, excavation, and construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction of the Proposed Project would require the export of soil, asphalt, and construction debris from the Project Site during the demolition, site clearing, and excavation phases. The excavation phase of the Proposed Project would generate additional haul trips and diesel fuel would be consumed by heavy equipment during the excavation, grading, and construction process. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period. In addition to diesel fuel and vehicular fuel, an unquantifiable amount of electricity and natural gas would be consumed as a result of the temporary construction process.

Based on carbon dioxide emission factors for transportation fuels published by the U.S. Energy Information Administration, the amount of diesel and petroleum-based gasoline (E10)⁵³ consumed can be estimated based on CO₂ emissions.⁵⁴ Burning one gallon of diesel fuel generates approximately 22.38 pounds of CO₂. Burning one gallon of petroleum-based gasoline with 10 percent ethanol content (E10)

⁵³ *Blends of petroleum-based gasoline with 10% ethanol, commonly referred to as E10, account for more than 95% of the fuel consumed in motor vehicles with gasoline engines, U.S. Energy Information Administration, website: <http://www.eia.gov/todayinenergy/detail.php?id=26092>, accessed May 2017.*

⁵⁴ *U.S. Energy Information Administration, website: <http://www.eia.gov/tools/faqs/faq.cfm?id=307&t=11>, accessed May 2017.*

produces approximately 17.68 pounds of CO₂ emissions. Based on the U.S. Energy Information Administration fuel consumption factors identified above, and the Proposed Project's estimated "Total CO₂" emissions presented in Appendix E of this IS/MND, Greenhouse Gas Emissions Worksheets, it is estimated that the construction of the Proposed Project would consume approximately 135,422 gallons of fuel, including approximately 73,287 gallons of diesel fuel and 62,135 gallons of gasoline.⁵⁵

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure. Accordingly, energy demands during construction would be less than significant.

b) Operation

i) Electricity

As shown in Table III-30, below, the estimated net increase in electricity consumption by the Proposed Project would be approximately 639,678 kWh per year. As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the *L.A. Green Building Code* requires projects to achieve a 20 percent reduction in wastewater generation. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption. Additionally, as discussed above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the panned growth of the City's power system.

The Proposed Project would include energy conservation features. Specifically, the new building would include energy efficient lighting fixtures, low-flow water features, and energy efficient mechanical heating and ventilation systems. Thus, the Proposed Project would incorporate energy conservation features.

⁵⁵ Refer to Fuel Consumption Calculations included as Appendix I in this IS/MND.

**Table III-30
Estimated Electricity Consumption by the Proposed Project**

Land Use	Size	Generation Rate^a	Total (kilowatt hours/year)
Existing Conditions			
Counseling and Learning Center	10,604 sf	12.95 kWh/sf/year	137,322
Total Existing Electricity Demand:			137,322
Proposed Project			
Medical Office / Counseling and Learning Center	60,000 sf	12.95 kWh/sf/year	777,000
Total Proposed Project Electricity Demand:			777,000
<i>Less Existing Electricity:</i>			<i>-137,322</i>
Total Net Electricity Demand:			639,678
<i>Notes:</i>			
<i>sf: square feet; kWh = kilowatt-hour</i>			
<i>^a SCAQMD CEQA Air Quality Handbook, 1993.</i>			
<i>Source: Parker Environmental Consultants, 2017.</i>			

ii) Natural Gas

Natural gas for the Project Site is provided by Southern California Gas Company (“SCG”). Gas supply available to SCG from California sources averaged 122 million cf/day in 2015. SCG projects total natural gas demand to decrease at an annual rate of 0.6 percent per year from 2016 to 2035. This decrease is due to more efficient power plants, pursuing demand-side reductions, and the acquisition of preferred power generation resources that produce little or no carbon emissions. Thus, with the natural gas consumption becoming more efficient and decreasing, the SCG’s projection for natural gas also decreases. Interstate pipeline delivery capability into SCG on any given day is theoretically approximately 6,725 million cf/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SCG’s estimated physical capacity of upstream pipelines. SCG’s storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cubic feet; of that, 83 billion cubic feet is allocated to residential, small industrial and commercial customers.⁵⁶ As shown in Table III-31, below, the natural gas consumption as a result of the operation of the Proposed Project, approximately 98,792 cubic feet per month, would represent a very small fraction of one percent of the SCG’s existing natural gas storage capacity and therefore, would be within the SCG’s existing natural gas storage capacity of 83 billion cubic feet as of 2016.

⁵⁶ California Gas and Electric Utilities, 2016 California Gas Report, website: <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>, accessed May 2017.

**Table III-31
Estimated Natural Gas Consumption by the Proposed Project**

Land Use	Size	Generation Rate^a	Total (cubic feet/month)
Existing Conditions			
Counseling and Learning Center	10,604 sf	2 cf/sf/month	21,208
Total Existing Natural Gas Consumption:			21,208
Proposed Project			
Medical Office / Counseling and Learning Center	60,000 sf	2 cf/sf/month	120,000
Total Proposed Project Natural Gas Consumption:			120,000
<i>Less Natural Gas Consumption:</i>			<i>-21,208</i>
Proposed Project Total Net Increase in Natural Gas Consumption			98,792
<i>Notes:</i>			
<i>cf = cubic feet; sf = square feet</i>			
<i>^a SCAQMD CEQA Air Quality Handbook, 1993.</i>			
<i>Source: Parker Environmental Consultants, 2017.</i>			

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption.

Fossil Fuels

Approximately 183,902 gallons of gasoline fuel would be utilized by mobile sources annually during operation of the Proposed Project.⁵⁷ However, the Proposed Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas and oil. The Project Site is located in the City of Los Angeles, which connects to the regional transit network in the Los Angeles area. The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority ("Metro"), LADOT DASH). Metro also operates two rail line in the Project area: the Metro Blue Line and the Green Line. The Metro Blue Line stops at the 103rd Street/Watts Towers Station, approximately 0.3 mile (walking distance) east of the Project Site. The Metro Blue Line connects from Downtown Los Angeles to Long Beach. The Metro Green Line runs from Norwalk to Redondo Beach with the closest stop at the Avalon Station. The Project vicinity is served by eleven Metro bus lines (48, 51/52/351, 53, 55/355, 117,

⁵⁷ Refer to Fuel Consumption Calculations included as Appendix I in this IS/MND.

202, 254, and 612) and the LADOT DASH Watts Line.⁵⁸ Due to its proximity to the bus stops and Metro stations aforementioned, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

Additionally, as an infill development, Proposed Project would incorporate a mix of residential, retail, and restaurant uses. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some residents and/or visitors would take transit to their destinations, or would walk to destinations nearby. As discussed in the Traffic Study (see Appendix H of this IS/MND), because the commercial component of the Proposed Project would be primarily serving to the proposed development and surrounding project area, some of the trips might be expected to be walk-ins either from the Proposed Project or the surrounding area. Certain adjustments to the trip generation were therefore made, with LADOT approval, to reflect these conditions. For the trips generated by the medical office uses, a reduction of 10% for use of transit and walk-ins from the surrounding area and a pass-by rate of 10% were applied. For the trips generated by the counseling center, a reduction of 10% for use of transit and walk-ins from the surrounding area was applied. The reduction in vehicle trips, due to the Project Site's location in a transit-oriented district, would therefore decrease the Proposed Project's reliance on fossil fuels.

Renewable Energy

The LADWP's 2015 Power Integrated Resource Plan (IRP) serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost effective manner. The 2015 IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The 2015 IRP outlines an aggressive strategy for LADWP to accomplish its goals and provide sufficient resources over the next 20 years given the information presently available, including the following major strategic initiatives: (1) Eliminate Coal from LADWP's Power Supply, (2) Reach 33 percent renewable portfolio standard by 2020 and 50 percent by 2030, including a goal of 800 MW Local Solar, (3) Achieve 15 percent energy efficiency by 2020, (4) Eliminate the use of Once-through Cooling by Repowering Coastal Units by 2029, (5) Invest in the Power System Reliability Program, and (6) Promote a high scenario of Transportation Electrification. As the project will derive its electricity from the LADWP, the project's energy demands will primarily be derived from renewable energy sources. On a project specific level, the Proposed Project includes the following features which will further reduce energy demands:

- *Proximity to mass transit:* The Project Site is an infill site within a Transit Priority Area as defined by CEQA. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less.
- *In-Fill Smart Growth:* The Proposed Project is located on an existing infill site that is currently developed with a vacant fire station, vacant library, and a counseling and learning center, which is

⁵⁸ *Linscott, Law & Greenspan, Engineers, Traffic Impact Study for Kaiser Permanente Watts Learning Center and Health Pavilion Project, City of Los Angeles, California, August 2, 2017. See Appendix H of this IS/MND.*

located in a highly developed area of the Southeast Los Angeles area. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

- *Trip Reduction:* In addition to its location in a Transit Priority Area, the Proposed Project would also provide on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (Ord. 182,386). Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply six short-term bicycle parking spaces and 12 long-term bicycle parking spaces, for a total of 18 bicycle parking spaces. The Proposed Project proposes to provide the required bicycle parking spaces within the ground level and subterranean parking garage.
- *Resource Conservation:* As mandated by the *L.A. Green Building Code*, the Proposed Project would be required to meet Title 24 2016 standards. The Proposed Project would incorporate energy conservation features in the proposed building such as low-flow water fixtures and energy conservation appliances.

With incorporation of the features identified above, the Proposed Project would not result in any significant environmental effects with respect to renewable energy.

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V. REFERENCES AND ACRONYMS

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2. ACRONYMS AND ABBREVIATIONS

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
Cal/EPA	California Environmental Protection Agency

CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH ₄	Methane
CHMIRS	California Hazardous Material Incident Report System
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
City Zoning Code	City of Los Angeles Planning and Zoning Code
CIWMA	California Integrated Waste Management Act
CLARTS	Central Los Angeles Refuse Transfer Station
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
CPA	Community Plan Area
CPC	City Planning Commission
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA/LA	Community Redevelopment Agency of the City of Los Angeles
CUP	conditional use permit
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level

DHS	California Department of Health and Services
DOGGR	California Department of Conservation Division of Oil, Gas, and Geothermal Resources
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
EZ	Los Angeles State Enterprise Zone
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTIP	Federal Transportation Improvement Program
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HQTA	High-Quality Transit Areas
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-101	Hollywood Freeway
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
LAAFP	Los Angeles Aqueduct Filtration Plant
LABC	City of Los Angeles Building Code
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department

LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L _{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L _{eq}	equivalent energy noise level/ambient noise level
LID	Low Impact Development
LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
MERV	Minimum Efficiency Reporting Value
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M _{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N ₂ O	nitrous oxide
NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commission
NFRAP	No Further Remedial Action Planned Sites
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O ₃	Ozone
OAL	California Office of Administrative Law

OPA	Owner Participation Agreement
OPR	Office of Planning and Research
Pb	lead
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM ₁₀	respirable particulate matter
PM _{2.5}	fine particulate matter
ppd	pounds per day
ppm	parts per million
PRC	Public Resources Code
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act
RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases
ROWD	Report of Waste Discharge
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas Company
SCH	State Clearinghouse
sf	square feet
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SO ₂	sulfur dioxide
SO ₄	sulfates
SOx	sulfur oxides
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test

SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Storm Water Mitigation Plan
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	Stormwater Management Plan
SWMPP	Solid Waste Management Policy Plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TCM	transportation control measures
TDM	Transportation Demand Management Plan
TFAR	Transfer of Floor Area Rights
TIA	Traffic Impact Assessment
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal
TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
USEPA/ U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRF	Variable Refrigerant Flow Air-conditioning
WE	Water Efficiency
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m ³	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System