

## 4. OTHER ENVIRONMENTAL CONSIDERATIONS

Section 15126 of the CEQA Guidelines identifies the subjects that shall be discussed in an EIR including: effects determined not to be significant, irreversible environmental changes, and growth-inducing effects. Effects determined not to be significant and growth-inducing effects are discussed in the following sections. Irreversible environmental changes are not discussed in this EIR because the Proposed Project is not a plan, policy, or ordinance. This chapter also summarizes significant and unavoidable impacts identified in Chapter 3 and anticipated permits and approvals.

### 4.1. EFFECTS DETERMINED NOT TO BE SIGNIFICANT

Metro has determined that the Proposed Project would not have the potential to cause significant impacts related to the resource areas listed below. Similarly, there is no potential for the Proposed Project to combine with past, present, and reasonably probable future projects to create a cumulative impact to these resources. These resource areas are briefly addressed in in this section. Each resource area was assessed using Appendix G of the CEQA Guidelines.

- Agriculture and Forestry Resources
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

#### 4.1.1. Agriculture and Forestry Resources

- a) **Would the Proposed 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 zoned by the City of Los Angeles for Heavy Manufacturing and Public Facilities.<sup>1</sup> The Project Site has not been designated by the California Department of Conservation (CDC) as Prime Farmland, Unique Farmland, or Farmland of

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<sup>1</sup>City of Los Angeles, *Zoning Information and Map Access System (ZIMAS)*, September 2017.

Statewide Importance.<sup>2</sup> Project implementation would not convert farmland to non-agricultural use. Therefore, no impact would occur.

**b) Would the Proposed Project conflict with existing zoning for agricultural use or a Williamson Act contract?**

**No Impact.** The Project Site and surrounding areas are not zoned by the City of Los Angeles for agricultural use. Neither the Project Site nor nearby lands are enrolled in a Williamson Act contract. Proposed Project implementation would conflict neither with existing zoning for agricultural use nor with a Williamson Act contract. Therefore, no impact would occur.

**c) Would the Proposed Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

**No Impact.** The Project Site is located within a developed industrial area of the City of Los Angeles and is not zoned for forest land according to the City's Zoning Information and Map Access System (ZIMAS). Proposed Project implementation would not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production. Therefore, no impact would occur.

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

**No Impact.** The Project Site is located in a heavily urbanized area of the City of Los Angeles, is not zoned for forest land, and does not include a forest. The Proposed Project would not result in the loss or conversion of forest land. Therefore, no impact would occur.

**e) Would the Proposed 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.** The Project Site is located within an urbanized, industrial/manufacturing area. There is no farmland or forest land located on the Project Site or in its immediate vicinity. The Proposed Project would not involve changes to 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. Therefore, no impact would occur.

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<sup>2</sup>California Department of Conservation, *Farmland Mapping and Monitoring Program, Field Report*, 2016.

#### 4.1.2. Biological Resources

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

**No Impact.** The Project Site is located in a highly urbanized, heavy industrial area in downtown Los Angeles. No natural habitats have been identified on the Project Site. The fully channelized Los Angeles River is approximately 200 feet east of the Project Site. However, there are no natural streams or waterways in the vicinity that would be considered ecologically sensitive or potentially harbor/support threatened or endangered species.

Neither the California Department of Fish and Wildlife (CDFW) nor the United States Fish and Wildlife Service (USFWS) have identified the Project Site as a critical habitat for threatened, endangered, candidate, sensitive, or special status species.<sup>3</sup> In addition, the Project Site is not located within an existing or proposed Significant Ecological Area (SEA), as designated by the County of Los Angeles.<sup>4</sup> The Southwestern Willow Flycatcher (*Empidonax traillii extimus*) and the Least Bell's Vireo (*Vireo bellii pusillus*) are federally designated and State-designated endangered species that were identified within one- and five-mile radii, respectively, of the Project Site using the California Natural Diversity Database (CNDDDB) RareFind 5 web application.<sup>5</sup> Neither species is anticipated to be found within or near the Project Site as the area has been heavily developed and does not contain habitat for these species. Therefore, no impact would occur.

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

**No Impact.** The fully channelized Los Angeles River is approximately 200 feet to the east of the Project Site. However, there are no natural streams or waterways in the vicinity that would be considered ecologically sensitive or potentially harbor/support threatened or endangered species. A review of local and regional plans determined that no riparian habitats or sensitive natural communities are located on-site or in the adjacent surrounding area. Riparian habitats and/or sensitive natural communities have also not been identified in City or regional plans or policies, or regulations of the CDFW, USFWS, or the County of Los Angeles as being on-site or in the adjacent surrounding area. Therefore, no impact would occur.

<sup>3</sup>U.S. Fish and Wildlife Service, *Environmental Conservation Online System (ECOS)*, September 2017.

<sup>4</sup>Los Angeles County Department of Regional Planning, *Significant Ecological Area (SEA) Program*, September 2017.

<sup>5</sup>California Department of Fish and Wildlife, *CNDDDB Rarefind 5*, September 2017.

- c) **Would the Proposed 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.** The Los Angeles River is entirely concrete-lined adjacent to the Project Site. The Project Site is not located within or near an area that would be considered a wetland as defined by Section 404 of the Clean Water Act, according to the California Wetlands Information System, and no wetlands have been identified at this location. Therefore, no impact would occur.

- d) **Would the Proposed 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?**

**Less-than-Significant Impact with Regulatory Compliance.** The Project Site is occupied by industrial uses in an urbanized expanse that has been previously disturbed by past activities and does not provide wilderness habitats. The CNDDDB RareFind 5 web application identifies ten species that are native to the area within a one- to five-mile radius of the Project Site. Six species were identified as still inhabiting the area, one species was determined to have been eradicated or displaced from the area, and three species were identified as possibly having been eradicated or displaced from the area.<sup>6</sup> No native species have been observed on the Project Site. There are no migratory fish or wildlife species, or migratory wildlife corridors on-site or within the area, and the Proposed Project would not impede any use of native wildlife nursery sites.<sup>7,8</sup> No migratory birds have been identified on the Project Site and no bats have been identified underneath the 1<sup>st</sup> Street Bridge. One palm tree has been identified on the Project Site and no bird nests have been observed. Furthermore, the Los Angeles River is not considered to be a SEA or a critical habitat around the Project Site. Metro's past practices required the survey of potential nesting sites if construction commenced during nesting season (March through August). As part of Metro's standard practices, such surveys are required to be completed by a qualified biologist during the construction process. Identified nests would be protected in place to ensure compliance with all applicable laws and regulations, including the Migratory Bird Treaty Act and California Fish and Wildlife Code's Protection of birds' nests (Section 3503 and 3503.5) and Taking Migratory Bird Treaty Act birds (Section 3513). Therefore, a less-than-significant impact would occur with regulatory compliance.

<sup>6</sup>California Department of Fish and Wildlife, *CNDDDB Rarefind 5*, September 2017.

<sup>7</sup>U.S. Fish and Wildlife Service, *Environmental Conservation Online System (ECOS)*, September 2017.

<sup>8</sup>Los Angeles County Department of Regional Planning, *Significant Ecological Area (SEA) Program*, September 2017.

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

**Less-than-Significant Impact.** One palm tree, which is not of a protected species, has been identified on the Project Site. The Project Site does not contain locally protected biological resources such as oak trees, Southern California black walnut trees, western sycamore trees, or California bay trees. Approximately five mature street trees are located on the west side of Center Street between the proposed MOW building and the Citizens Warehouse/Lysle Storage Company building. None of the trees have been identified as locally protected biological resources (e.g., western sycamore). The Proposed Project does not include tree removal at this location and the existing street trees would not be impacted. Therefore, impacts would be less than significant.

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

**No Impact.** The Project Site is located in a highly urbanized, heavy industrial area in downtown Los Angeles. No natural habitats have been identified on the Project Site. The Proposed Project is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.<sup>9</sup> Therefore, no impact would occur.

#### 4.1.3. Geology and Soils

**a) Would the Proposed Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

*i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

**Less-than-Significant Impact with Regulatory Compliance.** The Alquist-Priolo Earthquake Fault Zoning Act is intended to mitigate the hazard of surface fault rupture on structures for human occupancy. The Project Site is not within an Alquist-Priolo Fault Zone and there is no substantial evidence of another fault that could create surface rupture hazards.<sup>10</sup> The Upper Elysian Park Fault is the nearest fault to the Project Site, approximately one mile away.<sup>11</sup> The Proposed Project would be required to comply with the California Department of Conservation, Division of Mines and Geology Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety

<sup>9</sup>California Department of Fish and Wildlife, *California Regional Conservation Plans Map*, September 2017.

<sup>10</sup>California Department of Conservation, *Seismic Hazard Zones Map*, September 2017.

<sup>11</sup>City of Los Angeles, *Zoning Information and Map Access System (ZIMAS)*, September 2017.

requirements in the International Building Code (IBC), California Building Code, and the Los Angeles Building Code (LABC).<sup>12,13,14,15</sup> Therefore, a less-than-significant impact would occur with regulatory compliance.

*ii) Strong seismic ground shaking?*

**Less-than-Significant Impact with Regulatory Compliance.** The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Seismic activities associated with a number of nearby faults (e.g., Hollywood, Raymond, Newport, Sierra Madre, and San Andreas Faults), as well as blind thrust faults (e.g., Elysian Park, Puente Hills, and Compton), can generate seismic shaking. Consequently, development of the Proposed Project could expose people and structures to strong seismic ground shaking. However, the Proposed Project would be designed and constructed in accordance with building codes to reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. The Proposed Project would be required to comply with the California Department of Conservation, Division of Mines and Geology Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provide guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety requirements in the IBC. In addition, it is standard Metro practice to require geotechnical reports prior to construction activities. Therefore, a less-than-significant impact would occur with regulatory compliance.

*iii) Seismic-related ground failure, including liquefaction?*

**Less-than-Significant Impact with Regulatory Compliance.** Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle. The northern portion of the Project Site near Jackson Street is located within an earthquake-induced liquefaction zone.<sup>16</sup>

The Proposed Project would not directly increase liquefaction hazards because it would not affect seismic conditions or alter underlying soil or groundwater characteristics that govern liquefaction potential. The water table is approximately 30 to 35 feet below grade

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<sup>12</sup>International Code Council, *International Building Code*, 2018.

<sup>13</sup>California Building Standards Commission, *2016 California Building Code - Title 24, Part 2*, 2016.

<sup>14</sup>California Building Standards Commission, *Errata to the 2016 California Building Code - Title 24, Part 2*, January 1, 2017.

<sup>15</sup>City of Los Angeles, *LAMC - Article 1 (Building Code)*, January 3, 2014.

<sup>16</sup>California Department of Conservation, *Seismic Hazard Zones Map*, September 2017.

and the soils below the groundwater are dense to very dense.<sup>17</sup> Under the provisions of State law and the LABC, construction projects in liquefaction-prone areas are required to prepare a geotechnical report prior to construction. Additionally, for properties with mapped maximum considered earthquake spectral response, as determined by Section 1613 of the California Building Code, a study is required to assess liquefaction potential. The recommendations (including structural and foundation design features) that are contained in the liquefaction potential study must be incorporated in grading and construction plans. Required compliance with the recommendations identified in the project-specific geotechnical evaluation and the LABC would ensure that future development would not be exposed to substantial risks associated with liquefaction. Therefore, the Proposed Project would not increase risks associated with liquefaction. Therefore, a less-than-significant impact would occur with regulatory compliance.

*iv) Landslides?*

**No Impact.** The Project Site and surrounding areas are fully developed and generally characterized by flat topography, and thus, would not be susceptible to landslides. The Project Site is not located within an earthquake-induced landslide area.<sup>18</sup> Therefore, no impact would occur.

**b) Would the Proposed Project result in substantial soil erosion or the loss of topsoil?**

**Less-than-Significant Impact with Regulatory Compliance.** Construction of the Proposed Project would result in ground surface disturbance during site clearance, excavation, and grading, which could create the potential for soil erosion to occur. The Project Site is primarily developed with tracks on ballast, which is permeable groundcover. Significant topsoil is not expected to be present. Construction activities would be performed in accordance with the requirements of the LABC and the Los Angeles Regional Water Quality Control Board (LARWQCB) through the City's Stormwater Management Division. Implementation of Best Management Practices such as scheduling excavation and grading activities during dry weather as feasible and covering stockpiles of excavated soils with tarps or plastic sheeting would help reduce soil erosion due to grading and excavation activities. In addition, the Proposed Project would be required to develop a Stormwater Pollution Prevention Plan (SWPPP) and implement construction-related best management practices and comply with the Clean Water Act. The SWPPP would require implementation of an erosion control plan to reduce the potential for wind or waterborne erosion during the construction process. Therefore, a less-than-significant impact would occur with regulatory compliance.

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<sup>17</sup>T.Y. Lin International, *Division 20 Portal Widening Turnback Geotechnical Report*, 2017.

<sup>18</sup>*Ibid.*

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

**Less-than-Significant Impact with Regulatory Compliance.** The Proposed Project is located on a relatively flat site. Site investigations indicate that the Hanford soil is subsurface.<sup>19</sup> Hanford soils are well-drained soils with moderate permeability found on floodplains and alluvial fans, and are considered stable soils for industrial purposes.<sup>20</sup> The Proposed Project is partially located on ground that would be exposed to liquefaction.<sup>21</sup> However, as discussed in Subsection 4.1.3(a(iii)), required compliance with the recommendations identified in the project-specific geotechnical evaluation and the LABC would ensure that future development would not be exposed to substantial risks associated with liquefaction. The Proposed Project would not be at risk of subsidence, landslide, lateral spreading, or collapse. Therefore, a less-than-significant impact would occur with regulatory compliance.

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

**Less-than-Significant Impact with Regulatory Compliance.** Expansive soils have relatively high clay mineral content and are usually found in areas where underlying formations contain an abundance of clay minerals. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. Hanford soils typically contain 6 to 18 percent clay content.<sup>22</sup> Thus, soils on the Project Site may have the potential to shrink and swell resulting from changes in the moisture content. The Proposed Project would be required to comply with the requirements of the IBC, LAMC, and other applicable building codes. Compliance with such requirements would reduce impacts related to expansive soils. Therefore, a less-than-significant impact would occur with regulatory compliance.

- e) **Would the Proposed Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

**No Impact.** The Project Site is located in a highly urbanized area, where wastewater infrastructure currently exists. The Proposed Project would not use septic tanks or alternative wastewater disposal systems. Therefore, the capability of the soil to support septic tanks or alternative waste water disposal systems is not relevant to the Proposed Project. Therefore, no impact would occur.

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<sup>19</sup> AEI Consultants, *Phase II Subsurface Investigation for 729-737 East Temple Street, 718-736 East Jackson Street and 223 Center Street*, March 14, 2007.

<sup>20</sup> United States Department of Agriculture, *Official Soil Series Descriptions*, September 2017.

<sup>21</sup> California Department of Conservation, *Seismic Hazard Zones Map*, September 2017.

<sup>22</sup> United States Department of Agriculture, *Official Soil Series Descriptions*, September 2017.

#### 4.1.4. Hydrology and Water Quality

##### a) Would the Proposed Project violate any water quality standards or waste discharge requirements?

**Less-than-Significant Impact with Regulatory Compliance.** Construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. Metro standard practices require contractors to control water runoff quality in accordance with the guidance of the California Stormwater Quality Association's Industrial & Commercial and Construction Best Management Practice Handbooks. Example practices include securely covering construction stockpiles and employing fiber filters at storm drain inlets.

The Clean Water Act and associated federal regulations (Title 40 of the Code of Federal Regulations [CFR] 123.25(a)(9), 122.26(a), 122.26(b)(14)(x) and 122.26(b)(15)) require nearly all construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more, including smaller sites in a larger common plan of development or sale, to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit for their stormwater discharges. In addition, the fully channelized Los Angeles River is approximately 200 feet east of the Project Site. Metro will prepare a SWPPP consistent with NPDES requirements. Refer to the State Water Resources Control Board Storm Water Program and California Stormwater Quality Association for additional information.<sup>23,24,25</sup> The SWPPP would specify erosion control, sediment control, non-stormwater management, and materials management. The SWPPP would address requirements throughout the operational life of the Proposed Project through source and treatment control. Source control would be used to prevent pollutants from entering into stormwater discharges and may include effective site design, storm drain signage, properly managed maintenance bays and docks, properly managed trash storage areas, proper design and maintenance of outdoor materials storage areas, and proper maintenance of structural/treatment control. Similarly, a Standard Urban Stormwater Mitigation Plan (SUSMP) would be prepared in accordance with requirements established by the LARWQCB.<sup>26</sup>

The Proposed Project would also be consistent with the guidelines and standards outlined in the City of Los Angeles' Low Impact Development ordinance.<sup>27</sup> The main purpose of this ordinance is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater at its source, while utilizing natural resources.

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<sup>23</sup>State Water Resources Control Board, *Construction General Permit Fact Sheet*, January 23, 2013.

<sup>24</sup>California Stormwater Quality Association, *Stormwater Best Management Practice Handbook Portal: Construction*, August 2011.

<sup>25</sup>California Stormwater Quality Association, *Stormwater Best Management Practice Handbook Portal: Industrial and Commercial*, September 2014.

<sup>26</sup>County of Los Angeles, *Standard Urban Stormwater Mitigation Plan (SUSMP) Review Sheet*, January 9, 2008.

<sup>27</sup>City of Los Angeles, *Low Impact Development Ordinance*, September 27, 2011.

The Proposed Project would not violate any water quality standards or waste discharge requirements. Therefore, a less-than-significant impact would occur with regulatory compliance.

- b) Would the Proposed 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 preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

**No Impact.** The Proposed Project would use water for construction (e.g., for dust control) and operational activities (e.g., cleaning activities), as discussed below in Subsection 4.1.11 (d). These activities would not require the use of groundwater at the Project Site. Potable water would be supplied by the LADWP, which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. In addition, the Project Site is predominantly permeable because of the ballast, except for the paved maintenance roads. There would be a slight increase in permeability in the expansion area as ballast would be added to properties that are currently almost entirely impermeable. Consequently, the Proposed Project would not reduce any existing percolation of surface water into the groundwater table and may even increase it. The Proposed Project would not directly result in a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, no impact would occur.

- c) Would the Proposed 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 with Regulatory Compliance.** The Project Site is located in a highly urbanized area and is mostly permeable due to its ballast groundcover. The Proposed Project includes the establishment of two storage yards on currently developed properties. The introduction of the storage yards would slightly increase the permeable land surface area and the Proposed Project would maintain viable drainage patterns currently existing at the Project Site. In addition, Metro would prepare an SWPPP prior to starting construction. The Proposed Project would not alter the course of the Los Angeles River and urban runoff would be collected by the existing stormwater drainage system. Refer to Subsection 4.1.11 (c) for additional storm drain details. As previously discussed, the SWPPP would control and minimize erosion and siltation. Therefore, a less-than-significant impact would occur with regulatory compliance.

- d) **Would the Proposed 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 with Regulatory Compliance.** As previously discussed, the SWPPP would control and minimize the potential for flooding. During project operations, stormwater and any irrigation runoff water would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. In addition, prior to starting construction, a drainage plan would be finalized by Metro to ensure that drainage would be consistent with SWPPP requirements.<sup>28</sup> Therefore, a less-than-significant impact would occur with regulatory compliance.

- e) **Would the Proposed 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 with Regulatory Compliance.** The SWPPP would ensure that surface water runoff would continue to flow to the City's storm drain system. The Proposed Project would maintain impervious surfaces and would utilize existing stormwater drainage existing at the Project Site. Water runoff after development would not exceed the capacity of existing or planned drainage systems.<sup>29</sup> The Proposed Project would not create or contribute runoff water that would exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff. Any water applied during construction (e.g., for dust control) would be minimal and easily accommodated by the storm drainage system. Impacts related to exceedance of existing storm drain capacities or water quality would be less than significant. Therefore, a less-than-significant impact would occur with regulatory compliance.

- f) **Would the Proposed Project otherwise substantially degrade water quality?**

**Less-than-Significant Impact with Regulatory Compliance.** The Proposed Project would be required to have an SWPPP, which would require source and treatment control. This would minimize any pollutant discharges into storm drains. Therefore, a less-than-significant impact would occur with regulatory compliance.

- g) **Would the Proposed 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.** The Proposed Project does not include housing. Therefore, no impact would occur.

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<sup>28</sup>T.Y. Lin International, *Division 20 Preliminary Drainage Report*, 2017.

<sup>29</sup>*Ibid.*

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

**No Impact.** The Project Site is located within Flood Insurance Rate Map (FIRM) area 06037C1636 and does not fall within a 100-year flood hazard area.<sup>30</sup> There is no potential to impede or redirect flood flows. Therefore, no impact would occur.

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

**No Impact.** The Project Site is not located in a 100-year flood zone. The Los Angeles River adjacent to the Project Site is a concrete-lined channel to control flooding. The Proposed Project would not expose people or structures to a risk of loss, injury, or death from dam failure. Therefore, no impact would occur.

**j) Would the Proposed Project expose people or structures to significant risk of loss, injury, or death from inundation by seiche, tsunami, or mudflow?**

**No Impact.** According to the Department of Conservation Tsunami Inundation Map, the Project Site is not within an inundation zone for a seiche or tsunami.<sup>31</sup> In addition, the Project Site is not located within a landslide hazard area and hence would not be vulnerable to damage caused by a mudflow.<sup>32</sup> Therefore, no impact would occur.

#### 4.1.5. Land Use and Planning

**a) Would the Proposed Project physically divide an established community?**

**No Impact.** The Project Site is located between the Arts District and the Los Angeles River. Considering the north to south orientation, the Project Site is located on the eastern edge of the Arts District. The Proposed Project would not interfere with the community circulation patterns on Center Street or Santa Fe Avenue. Considering the east to west orientation, the existing Division 20 Rail Yard does not provide access to the community on the east side of the Los Angeles River. Access is provided by the 1<sup>st</sup> and 4<sup>th</sup> Street Bridges, and the roadways would not be altered by the Proposed Project. The Proposed Project would vacate Jackson, Banning, and Ducommun Streets east of Center Avenue. However, these streets already currently dead end into the existing Division 20 Rail Yard.

The Proposed Project requires the expansion of the Division 20 Rail Yard to the west. The properties that would need to be acquired for this expansion include the Citizens Warehouse/Lysle Storage Company building and the LAPD Viertel's Central Division Police Garage.

<sup>30</sup>Federal Emergency Management Agency, *Flood Insurance Rates Map (FIRM)*, September 2017.

<sup>31</sup>California Department of Conservation, *Official Tsunami Inundation Maps*, September 2017.

<sup>32</sup>California Department of Conservation, *Landslides Maps, Investigation and Inventory of Slope Failures that Occurred in 1978 and 1980 in the Los Angeles [7.5'] Quadrangle, Los Angeles County, California*, 1982.

Table 4.1 shows the APN, street addresses, and parcel sizes of these properties. These properties are adjacent to the existing Division 20 Rail Yard and their use would not divide the community or affect vehicle, pedestrian, or bicycle access within the community. The Proposed Project would not disrupt or isolate any existing communities. Therefore, no impact would occur.

**Table 4.1. Required Land Acquisitions**

Current Use /a/	Assessor Parcel Numbers /a/	Street Addresses /a/	Parcel Size (Square Feet) /a/
Citizens Warehouse/Lysle Storage Company Building	5173-023-903	<ul style="list-style-type: none"> <li>• 1001 East 1<sup>st</sup> Street</li> <li>• 110 North Center Street</li> <li>• 112 North Center Street</li> </ul>	31,402.7
LAPD Viertel's Central Division Police Garage	5173-020-010	<ul style="list-style-type: none"> <li>• 500 North Center Street</li> <li>• 811 East Ducommun Street</li> </ul>	28,773.7
Commercial Building (a.k.a. "100-120 North Santa Fe Avenue")	5173-013-016	<ul style="list-style-type: none"> <li>• 100 North Santa Fe Avenue</li> <li>• 120 North Santa Fe Avenue</li> <li>• 746 East. Banning Street</li> <li>• 949 East 1<sup>st</sup> Street</li> </ul>	22,650.9

/a/ City of Los Angeles Department of City Planning, *Zoning Information and Map Access System (ZIMAS)*, <http://zimas.lacity.org>, accessed January 3, 2018.

Source: Terry A. Hayes Associates Inc., 2017.

Acquisitions requiring the displacement of existing businesses would comply with Section 7260 et seq. of the State Government Code to minimize adverse effects. All real property acquired would be appraised to determine its fair market value. Just compensation, which shall not be less than the approved appraisal made to each property owner, would be offered. Each business displaced as a result of the Proposed Project would be given advanced written notice and would be informed of the eligibility requirements for relocation assistance and payments. In addition, relocation consultants will be retained to assist in finding suitable replacement sites to accommodate the displaced businesses.

**b) Would the Proposed 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 mitigating an environmental effect?**

**No Impact.** According to the City of Los Angeles Department of Planning, the Project Site is located within the Central City North Community Plan Area (CPA) within M3 and PF zones. M3-Heavy Manufacturing zoning allows for construction and operation of various manufacturing uses, including service facilities and maintenance yards.<sup>33</sup> PF-Public Facilities allows for the use and development of publicly owned land, which includes the use of government buildings, structures, and office and service facilities including

<sup>33</sup>City of Los Angeles, LAMC - Article 2 (*Specific Planning - Zoning Comprehensive Zoning Plan*), 2017.

maintenance yards.<sup>34</sup> Additionally, the Project Site is located within the River Improvement Overlay (RIO) District and the East Los Angeles Enterprise Zone (EZ).<sup>35</sup> The RIO District requires projects to comply and support goals of the Los Angeles River Revitalization Master Plan and establish a positive interface between the properties and the river. Neither the existing nor proposed Division 20 Rail Yard abuts the Los Angeles River. The Rail Yard is separated from the Los Angeles River by numerous tracks, including freight and Metrolink rail tracks. The Proposed Project would not affect the interface between the properties and the river. The acquisition of the properties would not introduce inconsistencies with land use zones.

The Proposed Project's relationship to relevant plans, policies, and regulations is evaluated accordingly in the following discussion.

### State

**Complete Streets Act.** Assembly Bill 1358 requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists. Center Street is part of the Eastside Access Improvements: 1<sup>st</sup> & Central Project developed to improve historical and cultural connections in downtown Los Angeles by enhancing pedestrian and bicycle travel options through and between communities.<sup>36</sup> The focus of the Eastside Access Improvements: 1<sup>st</sup> & Central Project is access to Los Angeles Union Station, a regional transportation hub for numerous rail, bus and shuttle services, and the future Regional Connector Station at 1<sup>st</sup>/Central. The Proposed Project would not permanently alter Center Street and would not interfere with Metro's ability to implement the Eastside Access Improvements: 1<sup>st</sup> & Central Project. The Proposed Project is consistent with the Complete Streets Act.

### Regional

**Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).** The 2016-2040 RTP/SCS policies and goals focus on the need to coordinate land use and transportation decisions in order to manage travel demand within the region through the year 2040. The two objectives of the project are to construct core capacity improvements and construct new tracks and switches needed to accommodate increased service levels on the Metro Red and Purple Lines. These objectives are consistent with the overarching aims of the RTP/SCS.

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<sup>34</sup>City of Los Angeles, *Generalized Summary of Zoning Regulations*, 2017.

<sup>35</sup>City of Los Angeles, *Zoning Information (Z.I.) No. 2358, River Improvement Overlay District, Ordinance Nos. 183144 and 183145*, January 12, 2015.

<sup>36</sup>Metro, *Connect US Action Plan*, 2015.

**Metro Congestion Management Plan (CMP).** In addition to transportation system performance, the CMP emphasizes the relationship between local land use decisions and regional transportation. Metro's Land Use Analysis Program states all development projects that require preparation of an EIR must incorporate a CMP Transportation Impact Analysis into the document. The following CMP arterial and freeway monitoring locations are in the vicinity of the Project Site:

- Alameda Street at Washington Boulevard
- Interstate 5 freeway at Stadium Way
- US-101 freeway at Vignes Street
- State Route 110 at the US-101 freeway

The Proposed Project would not add more than 150 peak hour trips to the freeway monitoring locations or add more than 50 peak hour trips to the intersection monitoring locations. Refer to Subsection 4.1.10(b) for additional traffic details. A CMP analysis is not necessary.

### Local

**City of Los Angeles General Plan Citywide General Plan Framework.** The General Plan Framework includes the broad theme of sustained mobility with greater accessibility. The two objectives of the Proposed Project are to construct core capacity improvements and construct new tracks and switches needed to accommodate increased service levels on the Metro Red and Purple Lines. Therefore, the Proposed Project objectives are consistent with the overarching aims of the General Plan Framework.

**Central City North Community Plan.** The Project Site is currently designated for Heavy Manufacturing and Public Facilities land uses and proposed land uses would be consistent with these designations. The Community Plan states that the industrial sector within the Project Area should be encouraged and protected. In addition, the Community Plan encourages the continued development of the Arts District. The Proposed Project would be consistent with the local land use designations and would not interfere with continued development of the Arts District. Therefore, the Proposed Project would be consistent with the Community Plan.

Refer to the Section 3.3 Cultural Resources for a discussion of historic resources in the Community Plan area.

**c) Would the Proposed Project conflict with any applicable habitat conservation plan or natural community conservation plan?**

**No Impact.** The Project Site and surrounding area is fully developed mostly with industrial and commercial uses in a highly urbanized area of the City. The Project Site is not identified as critical habitat for threatened or endangered species and does not contain any candidate, sensitive, or special-status species. The Proposed Project would not

conflict with any habitat conservation plan or natural community conservation plan. Therefore, no impact would occur.

#### 4.1.6. Mineral Resources

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

**No Impact.** The Project Site is located within the Mineral Resources Zone-2.<sup>37</sup> These areas are underlain or suspected to be underlain by mineral deposits. Additionally, the Project Site is located within the Union Station Oil Field, a major drilling area.<sup>38</sup> However, the Proposed Project would not alter any land uses in a manner that would inhibit or restrict the extraction of mineral resources or oil beneath the Project Site. Therefore, no impact would occur.

**b) Would the Proposed 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.** Refer to the discussion in Subsection 4.1.6(a). No impact would occur.

#### 4.1.7. Population and Housing

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

**No Impact.** The Proposed Project would not include housing. Thus, it would not directly induce substantial population growth. Although the Proposed Project does involve the development of new infrastructure, its primary purpose is to support core capacity improvements and construct new tracks and switches needed to accommodate increased service levels on the Metro Red and Purple Lines that have been analyzed in a previous EIS/EIR and have already been approved. The Proposed Project itself is not an extension of the Metro Purple Line Project or Union Station. Hence, the Proposed Project would also not indirectly induce substantial population growth. Therefore, no impact would occur.

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

**No Impact.** The Proposed Project would not demolish, remove, or convert existing residential buildings. Therefore, no impact would occur.

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<sup>37</sup>City of Los Angeles General Plan, *Conservation Element, Exhibit A Mineral Resources*, January 2001.

<sup>38</sup>City of Los Angeles General Plan, *Safety Element, Exhibit E Oil Field and Oil Drilling Areas in the City of Los Angeles*, January 2001.

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

**No Impact.** Refer to the discussion in Subsection 4.1.7(b). No impact would occur.

**4.1.8. Public Services**

**a) Would the Proposed Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

*i) Fire protection*

**No Impact.** The Project Site and the surrounding area are currently served by the City of Los Angeles Fire Department (LAFD) Fire Station 4, located at 450 East Temple Street (approximately 0.6 miles to the northwest). The Proposed Project does not include housing and would not result in population growth. It is not anticipated that the Proposed Project would create a substantial increase in demand for fire protection and paramedic services. Nonetheless, the LAFD may require additional personnel and equipment to maintain the level of fire protection and paramedic services at the time of build-out. The LAFD Deployment Plan has been in place since mid-2011. Under the LAFD Deployment Plan, the service delivery area of each fire station is drawn to allow fire apparatus to reach any address in that district within a specified response time. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents and call frequencies, LAFD can shift resources to meet local demands for fire protection and paramedic services. The Proposed Project would not result in the need for a new fire station or other LAFD facilities. In addition, fire hydrant flow provisions would be expected to be in compliance with City of Los Angeles standards. Therefore, no impact would occur.

*ii) Police protection*

**No Impact.** The LAPD is responsible for law enforcement duties on buses, trains and transit stops in the Project Area, including at Union Station. The Project Area is currently served by the LAPD Central Community Police Station. There would be approximately 107 additional employees stationed at the Project Site after completion of the Proposed Project. The majority of these employees would be operating trains and not at the Project Site during the day. Employees located at the new MOW building would be existing but relocated employees of the Division 20 Rail Yard. It is not anticipated that there would be a substantial increase in permanent population within the Central Community Police Station's service area. It is not anticipated that the Proposed Project would create a substantial increase in demand for police protection services. Response times would be minimally affected by the Proposed Project due largely to the fact that most officers respond to calls for service from the field, and not from the station. In addition to regular police patrols in near the Project Site, the Proposed Project would incorporate security

features to provide for the safety of visitors and employees. These features would include video surveillance as well as lighting throughout the Project Site to ensure safety and visibility. The inclusion of these security measures would reduce a potential increase in the number for calls for service and the need to deploy additional police officers and/or increased patrols within the vicinity of the Project Site. The Proposed Project would not result in the need for new police department facilities. Therefore, no impact would occur.

*iii) Schools*

**Less-than-Significant Impact.** The Proposed Project does not include housing, but it would result in an increase of 107 employees stationed at the Project Site. However, this increase in the number of employees is unlikely to result in a substantial increase in enrollment at any one school since the residential locations of these new employees would likely be dispersed over a wide area within commuting distance of the Project Site. Therefore, impacts would be less than significant.

*iv) Parks*

**No Impact.** The Proposed Project would not acquire parkland nor include housing or growth-inducing development that would typically increase the demand for park usage. Therefore, no impact would occur.

*v) Other public facilities*

**No Impact.** The Proposed Project does not include housing and would not generate population growth that would affect other public facilities such as libraries. Therefore, no impact would occur.

#### 4.1.9. Recreation

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

**No Impact.** The closest park to the Project Site is Arts District Park, located approximately 0.3 miles to the west. The Proposed Project would not include housing or other development that would increase use of existing parks and recreational facilities. It is not anticipated that employees would use local parks. Therefore, no impact would occur.

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

**No Impact.** The Proposed Project would not construct new recreational facilities and, as discussed above, would not generate new demand for these facilities. Therefore, no impact would occur.

#### 4.1.10. Transportation and Traffic

- a) **Would the Proposed Project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections?)**

**Less-than-Significant Impact.** The following analysis assesses potential construction and operational impacts to the roadway system.

##### ***Construction***

Construction activities would temporarily add trucks and worker vehicles to the roadway network. Trucks would likely travel between the US-101 freeway and the Project Site via Commercial and Center Streets. It is anticipated that there would be a maximum of 50 truck trips per day (i.e., 50 inbound and 50 outbound) during portal widening activities and an average of three truck trips per day throughout the first year of construction, followed by a gradual reduction to 25 to 30 truck trips per day. There would likely be a maximum of 40 workers at the Project Site during the most intense construction days with an average of 20 workers per day throughout the construction process.

Assuming an eight-hour day, and an even distribution of haul trips, the maximum haul activity would be 12 truck trips per hour (six inbound trips and six outbound trips). One truck every ten minutes in each direction is not expected to significantly affect operating conditions along Commercial and Center Streets. In addition, Metro would be required to obtain a haul route permit from the City. The City has dedicated inspectors to monitor conditions of haul routes, enforce Good Neighbor Construction Practices, verify compliance with conditions on approved haul routes, respond to complaints of violations, and mediate conflicts and issues between neighbors and construction projects.

Regarding workers, the actual peak-hour trip generation would vary depending on work hours, but typical construction worker shifts start and end before the AM and PM peak hours. Assuming 60 percent of construction worker trips occur outside of the peak hours, there would be approximately 16 peak-hour worker trips. This estimation is based on the conservative assumption that workers would not carpool. The peak-hour trips would be spread throughout the hour resulting in an average of approximately one trip every four minutes, or less than one trip per light cycle. This level of trip activity is not expected to significantly affect the operating conditions along local roadways.

Construction laydown and staging areas would be located on the Project Site or the existing soils remediation site adjacent to the LAPD Viertel's Central Division Police Garage, which would eliminate on-street queuing that could interfere with existing businesses and associated traffic along Commercial Street north of the Project Site, Center Street, and local streets west of Center Street. Construction trucks would access the Project Site from Center Street and not from Commercial Street. Furthermore, street

closures are not anticipated on Center Street and commercial access to existing businesses, east and west of Center Street, would not be impacted by truck activities.

The Project Site and existing Division 230 Rail Yard have ample room for construction parking and standard Metro practices prohibit construction workers from parking on public streets when space is available. It is standard Metro practice to coordinate oversized transport vehicles, if necessary, with the California Department of Transportation. In addition, the Proposed Project would not adversely affect US-101 ramp queues based on the 16 peak-hour worker trips discussed above and the standard Metro practice to prohibit hauling during peak hours when roadways are most congested.

Impacts on the roadway system due to construction activities would be less than significant based on the above analysis. In addition, Metro requires the following practices to be implemented on all construction projects:

- A flagman shall be placed at the truck entry and exit from the Project Site if visibility of oncoming traffic is limited or compromised.
- Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel periods to the degree possible, unless a peak hour variance is obtained, and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time.
- Access shall remain unobstructed for land uses in proximity to the Project Site during construction.
- Lane and sidewalk closures shall be minimized to the extent feasible. In the event of a temporary lane or sidewalk closure, a worksite traffic control plan shall be implemented to route traffic, pedestrians or cyclists around any such lane or sidewalk closures.
- A construction management plan shall be developed by the contractor and will be implemented during construction, to include the following:
  - Schedule vehicle movements to ensure there are no project-related vehicles waiting off-site and impeding public traffic flow on the surrounding streets.
  - Establish requirements for the loading, unloading, and storage of materials on the Project Site.
  - Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses.

### ***Operations***

There would be approximately 107 additional employees at the Project Site after completion of the Proposed Project. Employees would arrive through a combination of single-occupancy vehicles, carpools, and public transit. The majority of these employees would be operating trains during the day. The peak periods typically used to assess potential traffic impacts are from 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m. Train operators would arrive and depart outside of these hours as the peak traffic hours coincide

with peak train activities. Employees located at the new MOW building would be existing but relocated employees of the Division 20 Rail Yard and would not generate new trips. Travel by new employees during peak hours would be minimal and would not significantly affect roadway and intersection operations. Operational activities would not interfere with access or parking associated with businesses on Commercial Street. Operational access to the Project Site would be from Center Street and not from Commercial Street. Similar to the existing condition, parking would be allowed on the north side of Commercial Street and prohibited on the south side of the street. Therefore, operational activities would not significantly affect the roadway system.

**b) Would the Proposed Project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?**

**No Impact.** The CMP is a State-mandated program, administered by Metro for Los Angeles County, which provides a mechanism for coordinating land use and development decisions. The CMP requires establishment of standards to measure congestion at specific monitoring locations on the freeway and arterial systems. The following CMP arterial and freeway monitoring locations are located in the vicinity of the Project Site:

- Alameda Street at Washington Boulevard
- Interstate 5 freeway at Stadium Way
- US-101 freeway at Vignes Street
- State Route 110 at the US-101 freeway

Since the Proposed Project would not add more than 150 peak hour trips to the freeway monitoring locations nor would it add more than 50 peak hour trips to the intersection monitoring locations, a CMP analysis is not necessary. Therefore, no impact would occur.

**c) Would the Proposed 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.** The Proposed Project does not include an aviation component or include features that would interfere with air traffic patterns. Therefore, no impact would occur.

**d) Would the Proposed Project substantially increase hazards to a design feature or incompatible uses?**

**No Impact.** All access and circulation associated with the Proposed Project would be designed and constructed in conformance with all applicable requirements established by Metro, the LAFD, Occupational Safety and Health Administration, and the LAMC. The Proposed Project would not include the construction of new roads off the Project Site that would result in an increase in hazards due to a design feature. Therefore, no impact would occur.

**e) Would the Proposed Project result in inadequate emergency access?**

**Less-than-Significant Impact.** Construction activities have the potential to affect emergency access by adding construction traffic to the street network. As discussed above, it is anticipated that there would be a maximum of 16 worker trips per AM and PM peak hour period and 12 truck trips. Some temporary and minor impacts due to encroachment may occur on Center and Commercial Streets, although full lane closures are not anticipated as part of the Proposed Project. Despite the minimal increase in traffic on the roadway network, construction activities could slightly affect emergency access. However, emergency access to the Project Site would be maintained during construction, these impacts would be negligible and temporary, and the Proposed Project would be required to prepare a Construction Staging and Traffic Management Plan that would address traffic and access control during construction.

The Proposed Project would utilize the existing and planned network of regional and local streets in the study area. The Proposed Project would comply with standard engineering practices and design standards and would not include design elements that would increase roadway hazards or impede emergency access. In addition, as discussed above in Subsection 4.1.8(a), the Proposed Project would not create a substantial increase in demand for emergency services. Therefore, impacts would be less than significant.

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

**No Impact.** The two objectives of the Proposed Project are to construct core capacity improvements and construct new tracks and switches needed to accommodate increased service levels on the Metro Red and Purple Lines. These objectives are entirely consistent with Metro and City plans and policies to encourage public transit, bicycling activities, and walking.

Center Street is part of the Eastside Access Improvements: 1<sup>st</sup> & Central Project developed to improve historical and cultural connections in downtown Los Angeles by enhancing pedestrian and bicycle travel options through and between communities.<sup>39</sup> The focus of the Eastside Access Improvements: 1<sup>st</sup> & Central Project is access to Union Station, a regional transportation hub for numerous rail, bus and shuttle services, and the future Regional Connector station at 1<sup>st</sup>/Central. The Proposed Project would not permanently alter Center Street and would not interfere with Metro's ability to implement the Eastside Access Improvements: 1<sup>st</sup> & Central Project. In addition, the Proposed Project would not narrow the existing sidewalk on Center Street.

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<sup>39</sup>Metro, *Connect US Action Plan*, 2015.

Metro is in the process of studying the Los Angeles Bike Path Gap Closure Project. This gap closure would include the portion of the Los Angeles River frontage located 200 feet east of the Project Site. The new path would be designed to connect to existing and funded future pedestrian and bicycle infrastructure that touches the Project Area, including, but not limited to, the 6<sup>th</sup> Street Viaduct Replacement Project and other active transportation facilities identified in the City's Mobility Plan 2035. There is no existing public pedestrian or bicycle access to the Los Angeles River through the Division 20 Rail Yard that would be removed through implementation of the Proposed Project. Property acquisitions associated with the Proposed Project do not include land adjacent to the Los Angeles River that could be used as access points. Future access through the Rail Yard would not be possible due to public safety measures and Metro operational limitations. Potential access to the Los Angeles River from the 1<sup>st</sup> Street Bridge is not within the scope of the Rail Yard expansion and would need to be studied as part of the Los Angeles Bike Path Gap Closure Project.

Based on the above analyses, there is no potential for the Proposed Project to interfere with plans and policies to discourage the use of passenger vehicles. Therefore, no impact would occur.

#### 4.1.11. Utilities and Service Systems

##### a) **Would the Proposed Project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

**No Impact.** Wastewater from the Proposed Project would be served by the Hyperion Treatment Plant (HTP) located at 12000 Vista del Mar, Playa del Rey. The HTP includes full secondary treatment of wastewater, biosolids handling, as well as biogas to electricity generation. It is important to consider the existing and anticipated wastewater generation of the project in relation to current average daily flows experienced at the HTP, as well as in proportion to remaining capacity of the system. On average the HTP receives approximately 275 million gallons per day (mgd) of wastewater during dry weather, with a maximum capacity of 450 mgd during dry weather.<sup>40</sup> There would be approximately 107 additional employees stationed at the Project Site after completion of the Proposed Project. The majority of these employees would be operating trains and not at the Project Site during the day. Employees located at the new MOW building would be existing but relocated employees of the Division 20 Rail Yard. Furthermore, wastewater generated at the MOW building would be offset by existing wastewater generated at 100-120 North Santa Fe Avenue. The amount of wastewater generated by new individuals at the Project Site would be negligible in terms of HTP capacity. As a proportion of total average daily flow experienced by the HTP, the wastewater generation of the Proposed Project would account for a very small percentage of the 175 mgd remaining treatment capacity of HTP.

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<sup>40</sup>City of Los Angeles Department of Sewers, Environment LAsanitation, *Hyperion Treatment Plant Information*, October 9, 2017.

The increase in wastewater flow would not jeopardize the HTP's ability to operate within its established wastewater treatment requirements. Therefore, no impact would occur.

**b) Would the Proposed 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?**

**No Impact.** LADWP and the City of Los Angeles maintain water and sewer connections to the Project Site from Vignes Street (via smaller pipes on Commercial Street, Ducommun Street, Jackson Street, Temple Street, and Banning Street) and Santa Fe Avenue. The pipes on Vignes Street are 18 inches in diameter, and those on Santa Fe Avenue are 8 inches in diameter. The existing sanitary sewer and water services which currently serve the train wash building would require relocation to accommodate the Proposed Project's storage tracks. However, as discussed in Subsection 4.1.11 (a), the Proposed Project would not create wastewater system treatment capacity issues. Consequently, as further discussed below in Subsection 4.1.11 (d), the Proposed Project would not require the construction of new or expansion of existing water treatment facilities. Therefore, no impact would occur.

**c) Would the Proposed 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?**

**No Impact.** The Project Site, including 100-120 North Santa Fe Avenue, is fully developed and located within an industrial area. Several major storm drains traverse under the Rail Yard Due to the proximity to the Los Angeles River. They include:

- An 11.5-foot arch pipe that traverses beneath Ducommun Street near the portal, which discharges to the Los Angeles River.
- A 3.5-foot reinforced concrete pipe that traverses beneath Ducommun Street, which discharges to the Los Angeles River.
- A 12-foot reinforced concrete arch pipe in 2<sup>nd</sup> Street that traverses beneath the existing MOW building and under the tracks, which discharges into the Los Angeles River.
- A 7.5-foot vitrified brick and concrete pipe that traverses beneath Traction Avenue and curves south beneath Santa Fe Avenue, crosses 4<sup>th</sup> Street, and discharges into the Los Angeles River north of the 6<sup>th</sup> Street Bridge.

At the Rail Yard, an on-site network of trench drains and pipes collects runoff from the roof of the main shop building and nuisance water from around the building. The on-site runoff ultimately discharges through a single pipe to the 7.5-foot storm drain in Santa Fe Avenue. The topography of the Project Site is currently graded to the south. The Proposed Project would maintain existing drainage patterns and site-generated surface water runoff would continue to flow to the City's storm drain system. It is not anticipated that new development would increase existing stormwater runoff. Therefore, no impact would occur.

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

**No Impact.** LADWP conducts water planning based on an econometric water demand forecasting approach. Water demand is projected by major land use category (single-family, multi-family, commercial, industrial and government) as well as weather conditions. From 2015 to 2035 the City's water demand is expected to grow by approximately 95,996 acre-feet, with water supplies to meet this demand.<sup>41</sup>

The Proposed Project would not include the construction of new restroom facilities. Existing facilities comply with the Metro Energy Conservation Management Plan, which is a strategic blueprint to guide energy and water use in a sustainable, cost-effective, and efficient manner, and the California Green Building Code. In addition, water to be used at the proposed MOW building at 100-120 North Santa Fe Avenue would be offset by the discontinuation of water use by the building's current occupants. The Proposed Project would require additional potable and non-potable water for construction (e.g., for dust control) and operational activities (e.g., cleaning activities). Domestic water lines would need to be added to support maintenance activities that would occur in the Proposed Project's new storage track areas. Operation of the Proposed Project falls within the planning period for the 2010 Urban Water Management Plan (UWMP) and was anticipated by LADWP as a part of the overall growth of in their service area. As discussed above, the UWMP concluded that LADWP has sufficient water supplies to meet projected demands, and the Proposed Project demand for water would not require new water supply entitlements beyond those already considered in the 2010 UWMP. Therefore, no impact would occur.

**e) Would the Proposed 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?**

**No Impact.** Refer to discussion Subsection 4.1.11 (a) above. The existing wastewater provider would have sufficient capacity to accommodate the Proposed Project. Therefore, no impact would occur.

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

**No Impact.** The Proposed Project would generate a small amount of solid waste related to activities associated with new employees (e.g., food waste) and rail vehicle maintenance (e.g., cleaning rags). In compliance with Assembly Bill 939, Metro would be required to implement a Solid Waste Diversion Program and divert at least 50 percent of the solid waste generated by the Proposed Project from landfills. Operational solid waste and non-hazardous construction waste would likely be hauled to the Chiquita Canyon and Sunshine Canyon Landfills. These landfills accounted for over 95 percent of the City's solid waste

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<sup>41</sup>Los Angeles Department of Water and Power, *2010 Urban Water Management Plan, Exhibit ES-R Service Area Reliability Assessment for Average Weather Year, 2010.*

disposal in 2014.<sup>42</sup> At that time, Chiquita Canyon had a daily intake capacity of 2,442 tons per day and Sunshine Canyon had a daily intake capacity of 4,518 tons per day. It is anticipated that solid waste generated by the Proposed Project would represent less than 0.00001 percent of the remaining daily permitted intake capacity of the landfills. Furthermore, solid waste generated at the MOW building would be offset by existing solid waste generation at 100-120 North Santa Fe Avenue. Solid waste generated by the Proposed Project would be sufficiently accommodated by the landfills discussed above. Therefore, no impact would occur.

Refer to Section 3.6 Hazards and Hazardous Materials for a discussion related to the disposal of hazardous construction waste (e.g., demolition materials containing lead-based paint).

**g) Would the Proposed Project comply with federal, state, and local statutes and regulations related to solid waste?**

**No Impact.** Refer to discussion in Subsection 4.1.11 (f). The Proposed Project would comply with federal, State, and local statutes and regulations. Therefore, no impact would occur.

## 4.2. SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level. Implementation of the Proposed Project would result in the following significant and unavoidable impacts:

- Cultural Resources (Historical Resources). The Citizens Warehouse/Lysle Storage Company building has been determined to be eligible as a City of Los Angeles Historic-Cultural Monument. The Proposed Project includes mitigation to preserve and protect approximately 20,000 square feet of the building, including the frontage facing Center Street. However, the demolition of approximately 30,000 square feet would result in a significant and unavoidable impact. In addition, the 1<sup>st</sup> Street Bridge is designated by the City as a Historic-Cultural Monument. The Proposed Project would remove bents to accommodate new tracks. The Proposed Project includes mitigation measures to retain the original decorative brackets, reflect the original board-form appearance on new concrete, and use an infill treatment similar to the treatment used when the Bridge was first widened to accommodate the Metro Gold Line. However, removal of the bents would result in a significant and unavoidable impact. Furthermore, the National Ice and Cold Storage building would be demolished, which would result in a significant and unavoidable impact.

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<sup>42</sup>County of Los Angeles, Department of Public Works, *Countywide Integrated Waste Management Plan 2014 Annual Report*, December 2015.

- Noise and Vibration (Construction Noise and Vibration). The Proposed Project would include construction activities involving heavy-duty equipment directly adjacent to OSF. In addition, nighttime construction may be required to limit operational impacts to the existing Rail Yard. Noise and vibration levels would potentially exceed FTA standards at OSF. The Proposed Project includes Noise and Vibration Control and Monitoring Plans as mitigation measures. However, no feasible mitigation measures were identified to reduce the significant impact to a less-than-significant level.

### **4.3. GROWTH-INDUCING IMPACTS**

Section 15126.2(d) of the CEQA Guidelines requires that the EIR consider growth-inducing impacts of the Proposed Project. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. There would be approximately 107 additional employees stationed at the Project Site after completion of the Proposed Project. This anticipated increase in long-term employment would be relatively minor and would not result in a significant increase in the local population. Because the Proposed Project does not include housing, it would not directly induce growth in the vicinity of the Project Site.

Although the Proposed Project would accommodate the increase in transit service associated with the Purple Line Extension, the growth-inducing impacts of the increase in transit service have been analyzed in a previous EIS/EIR and have already been approved. Moreover, expansion of the Division 20 Rail Yard would not extend transit service to the Project Site, and the Metro Red and Purple Lines are located in a developed urban area with a limited number of vacant or underutilized parcels. Therefore, the Proposed Project would not directly or indirectly induce growth that would result in a substantial change in land use development patterns or result in substantial increases in employment or population.

### **4.4. ANTICIPATED PERMITS AND APPROVALS**

This document is intended to environmentally clear future related discretionary actions under CEQA by Metro and other agencies. Discretionary actions include those approvals, entitlements or permits necessary in order to implement a project. Metro will prepare a SWPPP consistent with federal and County requirements for stormwater discharges associated with construction and industrial activities. Coordination and approvals from communications and utility purveyors (e.g., Southern California Gas Company) would be needed for temporary or permanent utility relocation or service interruption. The Proposed Project would require various approval and/or permits from various City of Los Angeles departments, including the Fire Department, the Bureau of Engineering, the Department of Transportation, the Bureau of Street Services, the Department of Building and Safety, and the Bureau of Sanitation.