Initial Study/Proposed Mitigated Negative Declaration

Los Angeles Department of Water and Power
West Los Angeles District Headquarters Administration Building

Los Angeles Department of Water and Power
Environmental Services
111 North Hope Street, Room 1044
Los Angeles, California 90012

February 2005

Contents

List of Figures

List of Tables

Appendices

SECTION 1.0

INTRODUCTION

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2003) to determine if the project may have any significant effect on the environment.

CEQA INITIAL STUDY FORM

Project Title:

West Los Angeles District Headquarters Administration Building

Lead Agency Name and Address:

Los Angeles Department of Water and Power
Environmental Services
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Contact Person and Telephone Number:

Nadia Dale
Environmental Assessment
Los Angeles Department of Water and Power
(213) 367-1745

Project Location:

The Los Angeles Department of Water and Power's West Los Angeles District Headquarters site, located at 12300 Nebraska Avenue in West Los Angeles (see Section 2.1 for details).

Council District:

District 11

Project Sponsor's Name and Address:

Los Angeles Department of Water and Power
Power System Planning and Projects Business Group
Architectural Services
111 North Hope Street, Room 940
Los Angeles, CA 90012

General Plan Designation:

The project is located on a site officially designated for Public Faculties in the West Los Angeles Community Plan Area (the applicable community plan in the City of Los Angeles General Plan).

Description of Project:

The proposed project would consist of building a new two-story office building to house Los Angeles Department of Water and Power employees of the West Los Angeles District Headquarters. The proposed project site address is 12300 Nebraska Avenue in West Los Angeles.

Surrounding Land Uses and Setting:

The proposed project is immediately surrounded by residential uses to the northwest and commercial to the northeast, east, and south. The area directly to the southwest (as well as a portion to the southeast and northeast) is zoned for public facilities. The area directly to the southwest is occupied by the Los Angeles Department of Water and Power's Electrical Receiving Station-K. See Appendix B, the City of Los Angeles Department of Planning ZIMAS (Zone Information Map Access System) Map of the proposed project Site.

Agencies that may have an interest in the proposed project:

- Federal/California Occupational Safety and Health Administration
- City of Los Angeles Department of Transportation
- City of Los Angeles Department of City Planning
- City of Los Angeles Department of Building and Safety
- City of Los Angeles Fire Department
- City of Los Angeles Police Department
- County of Los Angeles Department of Public Works

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the Environmental Impacts discussion in Section 3.0.

☐ Aesthetics	☐ Agriculture Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology/Soils
☐ Hazards and Hazardous Materials	☐ Hydrology/Water Quality	☐ Land Use Planning
☐ Mineral Resources	☐ Noise	☐ Population/Housing
☐ Public Services	☐ Recreation	☐ Transportation/Traffic
☐ Utilities/Service Systems	☐ Mandatory Findings of Significance	

DETERMINATION

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 in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that 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 the 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 pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Charles C. Holloway — Signature

January 26, 2005 — Date

Charles Holloway
Supervisor of Environmental Assessment
Los Angeles Department of Water and Power

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SECTION 2.0

PROJECT DESCRIPTION

2.1 Project Location

The new building would be located at 12300 Nebraska Avenue between Wellesley Avenue and S. Carmelina Avenue in the community of West Los Angeles (see Figures 1 and 2, Project Location Map and Regional Location Map, respectively). The site where the new building will be located is currently being used for parking and is completely accessible. All project related activities, including staging and construction, would occur and be completely contained on Los Angeles Department of Water and Power (LADWP) property.

2.2 General Setting

The proposed project site is located within a highly urbanized area in the West Los Angeles community of the City of Los Angeles. Land uses in the vicinity of the proposed administration building include some residential, but are predominately public facilities and commercial.

2.3 Project Objectives

In order to provide a more modern, comfortable, and efficient office space for LADWP employees in the West Los Angeles area, LADWP's architectural group, of the Power System Planning and Projects, is designing a new two-story administration building to be built at the West Los Angeles District Headquarters (WLAHQ) site. The new building would replace the current 44-year-old and older buildings that WLAHQ employees currently work in. The new building will allow for an improved ergonomic and safe work environment. Existing WLAHQ staff is currently housed in several separate structures that date from the late 50's and early 60's and that are now technologically and technically obsolete. The new structure will integrate the administrative office areas, the restroom/locker room/fitness center facilities, the lunchroom facilities, and the work crew assembly areas into one structure. The future use of the old structures has not been determined. The ultimate use of the current buildings will be determined at a later date and treated as a separate project to be analyzed on its own merits.

The objectives of the new WLAHQ Administration Building are:

- To replace an outdated facility with a new state-of-the-art facility that utilizes energy-efficient and recycled materials and design elements.
- To relieve employee overcrowding in existing undersized facilities.
- To provide for a safe, code compliant work environment that meets current seismic criteria.

- To provide an architecturally designed building that complements the neighborhood.

FIGURE 1: PROJECT LOCATION MAP

FIGURE 2 : REGIONAL LOCATION MAP

2.4 Project Description

LADWP is in the process of developing construction documents for a new two-story administration building to be built at the WLAHQ site. The site for the new building is currently being used for parking and is completely accessible. The new building is a two-story office building of steel frame construction. The exterior consists of masonry on the ground floor and stair tower areas, and an aluminum and glass curtain wall system on the second floor and entry areas. The second floor plane and the roof structure will be metal deck and concrete fill. It is estimated the construction duration will be approximately 10 months. The facility use will be no different than what is already occurring on the site in various other buildings. This building will combine those work activities under one roof and give the employees a new and safe work environment. There will be no change in facility operations as a result of this project.

2.5 Construction Methods

The site for the new proposed building is 12300 Nebraska Avenue, which is currently used as a parking lot within the WLAHQ. The sequence of construction for the new office building will follow this general format:

1. The demolition and removal of all existing features that need to be cleared away prior to construction of the new facility. This will involve the breakup and removal of the asphalt paving at the existing parking lot on the northeast portion of the lot.
2. Trenching and excavation for the concrete foundation, underground electrical, and plumbing/sewer connections.
3. Formwork and placement of the steel reinforcing bars for the foundation.
4. Installation of the underground electrical conduit, plumbing supply lines, and sewer lines prior to pouring of the concrete foundation.
5. Pouring of the concrete foundation.
6. Installation of masonry work at the exterior and bearing walls.
7. Installation and erection of two-story steel columns and beam framework.
8. Installation of masonry work at exterior and bearing walls.
9. Installation of metal floor decking and pouring of lightweight concrete deck flooring at second floor level.
10. Installation of roof and roof covering.
11. Installation of exterior improvements including curbs and gutters, paving, and yard walls.
12. Installation of interior stud wall framing systems.
13. Installation of exterior glazing and exterior doors.
14. Installation of HVAC units on rooftop.
15. Installation of gypsum board interior wall sheathing.
16. Installation of ceiling systems.
17. Installation of interior doors.
18. Finishing of interior surfaces including interior painting, carpeting, tiling, etc.
19. Installation of exterior improvements including landscaping and hardscape features.
20. Punch-list walkthrough of the project prior to turnover to the user.
21. Installation of furniture, telephones, computers, and other user items.
22. Move In.

Construction activities would require the staging of materials. Materials would be staged on existing paved areas within the WLAHQ site. All of the construction activities would take place within the LADWP site, eliminating impacts to nearby streets.

2.6 Construction Schedule

If approved, the construction of the proposed project is anticipated to commence in September 2005 and take approximately 10 months to complete.

2.7 Land Use Consistency

Construction and operation of the proposed project would be consistent with existing land use of the site. No change to existing land use is proposed as part of this project.

2.8 Environmental Setting

As mentioned previously, the areas near the proposed project are characterized by urban development. There are limited sensitive natural resources in the proximity to the proposed project (i.e., at the existing WLAHQ, and various sensitive receptors (e.g., residences and a few businesses) exist in proximity to the proposed project to the northwest, north and northeast. The site is surrounded by residential, commercial, and public facilities including LADWP's electrical Receiving Station K.

2.9 Environmental Safeguards

To avoid potential impacts to cultural resources and traffic, construction of the proposed project would be conducted in accordance with the Standard Specifications for Public Works Construction (Greenbook). Additionally, potential traffic impacts would be minimized by conducting construction in accordance with the City of Los Angeles Work Area Traffic Control Handbook (WATCH) and traffic control plans approved by the City of Los Angeles Department of Transportation, to maintain acceptable levels of service, traffic safety, and emergency access for the site during construction. To minimize potential impacts to biological resources, construction activity and staging would be limited to disturbed areas.

2.10 Required Permits and Approvals

Permits and/or approvals may be required from the following agencies for the activities described:

- City of Los Angeles Department of Transportation – approval for traffic/transportation-related issues during construction.
- Los Angeles Regional Water Quality Control Board – permit for general construction runoff and/or construction dewatering discharges under the National Pollutant Discharge Elimination System (NPDES).
- City of Los Angeles Department of Building and Safety.
- City of Los Angeles Cultural Affairs Commission.
- City of Los Angeles Fire Department

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SECTION 3.0

DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

INTRODUCTION

The following discussion addresses potential impacts to various environmental resources, per the Initial Study Checklist questions contained in Appendix G of the State CEQA Guidelines. In some instances, one response addresses two or more checklist questions.

I. AESTHETICS

Would the project:

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

No Impact. The proposed project site is located in a developed urban area and is surrounded by single-family dwellings, multi-family residences, commercial uses, and various public facilities. No scenic vistas exist within the project site; therefore, the construction and operation of the proposed project would not have any effect on scenic vistas. No impacts are expected, and no mitigation is required.

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

No Impact. No scenic resources (including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway) exist near the proposed project. The project site is not located in the vicinity of a state scenic highway. The closest official designated scenic highway to the project site is approximately 15 miles away, the Arroyo Seco Historic Parkway - Between milepost 25.7 and milepost 31.9 in Los Angeles on Interstate Highway 110.[1]

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

Less than significant impact. The proposed project would involve the construction of a two-story office building with a footprint of approximately 11,000 square feet and a maximum height of 35 feet. A structure of this sort is a common element of the urban environment and therefore, impacts to

[1] California Department of Transportation website: http://www.dot.ca.gov/hq/LandArch/scenic_highways/. "Officially Designated Scenic Highways" Updated

the visual character of the surrounding area would be less than significant, and no mitigation is necessary (see Figures 4 and 5). Furthermore, the design will be submitted for review and approval by the City of Los Angeles Cultural Affairs Commission.

Figure 4: View of the current parking area (facing northwest) at the West Los Angeles District Headquarters showing a portion of the parking area where the new proposed office building will be located.

Figure 5: View of the current West Los Angeles District Headquarters Administration Building (facing southwest). The new two-story building would be situated in the foreground, directly northeast from this building.

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

Less Than Significant Impact. The proposed project site is located in an area developed with several urban uses, including residential, commercial, and public facilities. External and internal night and day illumination is already in place within the project area. The proposed project would involve the construction and operation of a two-story office building; the construction phase would be temporary and the activities would only occur during daylight hours. Nighttime construction activities would not be required for the construction of this proposed project; therefore, no light will be needed or created during its construction. However, traffic control and safety measures, such as barriers, reflective signs, and flashing warning lights would be implemented, as necessary. Once the building is in operation, the usage, activities, and hours of operation related to the building will be no different than what is currently occurring at the site. The building will serve as an office/work location and operate primarily during regular business hours, in the same manner that the current office buildings are used. The new two-story building will be replacing the use of the current/old buildings; therefore, there will be no net increase in activity.

II. AGRICULTURE RESOURCES

Would the project:

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

See Item c below.

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

See Item c below.

c) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use?

No Impact. The proposed project is located at an existing developed urban area, on a site owned by LADWP. The surrounding uses are single-family residences, as well as commercial and public facilities. The staging area(s) for construction would be at the existing LADWP facility or nearby lot. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) on, or in the vicinity of, the proposed project; therefore, there would be no potential for the construction or operation of the proposed project to convert farmland, either directly or indirectly, to non-agricultural use. No piece of land in the surrounding vicinity is zoned for agricultural uses or enrolled in a Williamson Act contract. No impacts are expected and no mitigation is required.

III. AIR QUALITY

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan (e.g., the SCAQMD Plan or Congestion Management Plan)?

No Impact. Within the proposed project area, the South Coast Air Quality Management District (SCAQMD) and the Southern California Association of Governments (SCAG) have the responsibility for preparing an Air Quality Management Plan (AQMP)[2], which addresses federal and state Clean Air Act requirements. The AQMP details goals, policies, and programs for improving air quality and establishes thresholds for daily operation emissions. The construction and operation of the proposed project is being undertaken to provide a safer and more modern working environment for the employees of the WLAHQ. The current facilities are outdated,

[2] The AQMP is developed using SCAG population data, as included in SCAG's Growth Management Plan (GMP) and Regional Mobility Plan (RMP). The AQMP estimates regional air pollutant emissions based on per capita emissions, as determined by historic AQMD air monitoring data. Inasmuch as SCAG population growth data is used to develop the AQMP, GMP, and RMP, SCAG and AQMD base regional traffic, as associated air quality, conditions on per capita impacts

overcrowded, overburdened, and obsolete by today's standards. The implementation of the proposed project would not affect population, housing units, or employment, and would thus be consistent with SCAG's Growth Management Plan. The proposed project would not have an impact on the type, size, or location of transportation infrastructure in the long-term, and would thus be consistent with SCAG's Regional Mobility Plan. The construction and operation of the proposed project is not anticipated to exceed the AQMP's daily emissions thresholds (as discussed in Items b and c below), and would therefore not conflict with or obstruct implementation of the AQMP. There are no Los Angeles County Metropolitan Transportation Authority (MTA) Congestion Management Plan (CMP) arterial corridors or intersections adjacent to the proposed project site. No such arteries, intersections, or freeway onramps or offramps would be affected by construction activities or by operation of the proposed project (see Section XV, Transportation/Traffic, on page 3-31 for further discussion of the CMP and related traffic issues). As such, no impacts to the local or regional air quality or congestion management plans would occur, and no mitigation is required.

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

See Item c below.

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

Less Than Significant Impact. The proposed project is located in the Los Angeles County sub-area of the South Coast Air Basin (Basin). Los Angeles County is designated as a "non-attainment" area for ozone (O_3), particulate matter with an aerodynamic diameter of less than 10 microns (PM_{10}), carbon monoxide (CO) and a "maintenance" area for oxides of nitrogen (NO_x), which denotes that it had once been a non-attainment area for the pollutant. The SCAQMD, the regional agency that regulates stationary sources, maintains an extensive air quality monitoring network to measure criteria pollutant concentrations throughout the Basin. The closest air monitoring station to the proposed project site is the West Los Angeles – VA Hospital Monitoring Station, located at 11301 Wilshire Boulevard in the City of Los Angeles. This monitoring station is approximately two miles from the proposed project, the data from which is most representative of the air quality conditions at the proposed project site. A summary of the air quality data from this monitoring station is summarized below in Table 1.

State and federal agencies have set ambient air quality standards for various pollutants. Both California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) have been established to protect the public health and welfare (See Table 2). The SCAQMD has prepared the *CEQA Air Quality Handbook* to provide guidance to those who analyze the air quality impacts of proposed projects. Based on Section 182(e) of the Federal Clean Air Act, the SCAQMD has set significance thresholds for five criteria pollutants. The SCAQMD significance threshold criteria are shown in Table 3.

Table 1
Ambient Air Quality Monitoring Summary,
West Los Angeles – VA Hospital Monitoring Station 1999-2001

Pollutant/Standard	Number of Days Threshold Were Exceeded at Monitoring Station and Maximum Levels During Such Violations		
	2000	**2001**	**2002**
Ozone			
State 1-Hour ≥ 0.09 ppm	2	1	1
Federal 1-Hour > 0.12 ppm	0	0	0
Federal 8-Hour > 0.08 ppm	0	0	0
Max. 1-Hour Conc. (ppm)	0.10	0.01	.118
Max. 8-Hour Conc. (ppm)	0.08	0.08	.078
Carbon Monoxide			
State 1-Hour > 20 ppm	0	0	NM
State 8-Hour > 9.0 ppm	0	0	0
Federal 8-Hour > 9.5 ppm	0	0	0
Max 1-Hour Conc. (ppm)	6	4	4
Max. 8-Hour Conc. (ppm)	4.3	3.0	2.7
Nitrogen Dioxide			
State 1-Hour > 0.25 ppm	0	0	NM
Max. 1-Hour Conc. (ppm)	0.16	0.11	NM
Sulfur Dioxide			
State 1-Hour > 0.25 ppm	NM	NM	NM
Max. 1-Hour Conc. (ppm)	NM	NM	NM
Inhalable Particulates (PM_{10}) [2]			
State 24-Hour > 50 µg/m^3	NM	NM	NM
Federal 24-Hour > 150 µg/m^3	NM	NM	NM
Max. 24-Hour Conc. (µg/m^3)	NM	NM	NM

ppm = parts per million
µg/m^3 = micrograms per cubic meter
NM = Not Measured
[1] Less than 12 full months of data and may not be representative.
[2] Percent of samples exceeding standard.

Source: South Coast Air Quality Management District, Current Air Quality Trends (Tables). http://www.aqmd.gov/smog

Table 2
State (CA) and Federal (NA) Ambient Air Quality Standards (AQS)

Pollutant	Averaging Time	CAAQS	NAAQS	
			Primary	Secondary
Ozone (O_3)	8-Hour	N/A	0.08 ppm (157 µg/m^3)	Same as Primary
	1-Hour	0.09 ppm (180 µg/m^3)	0.12 ppm (235 µg/m^3)	Same as Primary
Carbon Monoxide (CO)	8-Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	N/A
	1-Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	N/A
Nitrogen Dioxide (NO_2)	Annual	N/A	0.053 ppm (100 µg/m^3)	Same as Primary
	1-Hour	0.25 ppm (470 µg/m^3)	N/A	N/A
Sulfur Dioxide (SO_2)	Annual	N/A	0.030 ppm (80 µg/m^3)	N/A
	24-Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)	N/A
	3-Hour	N/A	N/A	0.5 ppm (1300 µg/m^3)
	1-Hour	0.25 ppm (655 µg/m^3)	N/A	N/A
Particulate Matter (PM_{10})	AAM	20 µg/m^3	50 µg/m^3	Same as Primary
	24-Hour	50 µg/m^3	150 µg/m^3	Same as Primary
Particulate Matter ($PM_{2.5}$)	AAM	12 µg/m^3	15 µg/m^3	Same as Primary
	24-Hour	N/A	65 µg/m^3	Same as Primary
Lead (Pb)	Quarterly	N/A	1.5 µg/m^3	Same as Primary
	Monthly	1.5 µg/m^3	N/A	N/A
Sulfates	24-Hour	25 µg/m^3	N/A	N/A

ppm = parts per million (by volume)
N/A = Not applicable
µg/m^3 = micrograms per cubic meter
mg/m^3 = milligrams per cubic meter
AAM = Annual arithmetic mean

Source: California Air Resources Board, Ambient Air Quality Standards (California and Federal), Available: http://www.arb.ca.gov/aqs/aqs.htm [May 15, 2003].

Table 3
SCAQMD Air Quality Impact Significance Thresholds

Pollutant	Construction Phase		Operational Phase
	(lbs/day)	*(tons/quarter)*	*(lbs/day)*
Reactive Organic Compounds (ROCs)	75	2.50	55
Carbon Monoxide (CO)	550	24.75	550
Nitrogen Oxides (NO_x)	100	2.50	55
Sulfur Oxides (SO_x)	150	6.75	150
Particulates (PM_{10})	150	6.75	150

Source: SCAQMD, CEQA Air Quality Handbook, 1993

Construction Emissions

The air quality impacts of construction and operations were evaluated using methods recommended in the latest SCAQMD *CEQA Air Quality Handbook* (April 1993). This analysis also used emission factors from the California Air Resources Board EMFAC 2002 Burden Model[3] for mobile source emissions (construction worker commute vehicles and haul truck trips). Construction equipment emissions factors were obtained from Table A9-8-A of the SCAQMD *CEQA Air Quality Handbook* and related updates/documents. Refer to Appendix B for emission factors, assumptions, and calculations.

Air contaminant emissions would result from the use of construction equipment and construction worker vehicles. The approximately first five months of construction will include the more heavy-duty work equipment. However, during the later five months of construction, after the shell of the building is completed, the majority of construction will occur inside the structure. This stage will just require trucks for deliveries and forklifts for off-loading and staging.

During the first five months of construction, site preparation activities would primarily consist of operation of two bulldozers, one backhoe, two air compressors, one diesel sweeping truck, one tracked tractor, one roller, two to three concrete trucks, and five delivery/haul trucks.

During the second five months of construction, the primary heavy-duty equipment used will be the sweeping truck, a forklift for unloading activities, and a crane for placement of HVAC units on the roof.

[3] Highest (Most Conservative) EMFAC 2002 (version 2.2)
http://www.aqmd.gov/ceqa/handbook/onroadEF03_25.xls

For the entire 10 months of construction, several (30 assumed) construction worker vehicles would be traveling to and from the proposed project site. On a typical workday, workers would travel directly to the construction site.

Additionally, emissions would result daily from truck trips associated with supply delivery (including building materials and/or concrete), transport of excavated soil from trenching (soil would be transported to the closest appropriate facility to be disposed in accordance with regulatory requirements), and transport of backfill and paving materials to the site. It is assumed that such truck operations would require six trucks to travel 40 miles per day, or an equivalent mix of trucks and trips, to a maximum of 960 miles per day.

The air quality emissions calculations assume 30 construction employees would drive 60 miles round trip each day. Under these assumptions, air emissions from worker commutes would not exceed SCAQMD significance threshold criteria. This is due to the fact that these emissions would represent very small percentages of the total emissions projected to result from construction activities, with the exception of ROCs and CO. Worker commute emissions for this pollutant would be 27.3 lbs/day of CO (10.8 percent of total CO daily construction emissions for the first five months of construction, 16.0 percent for the second five months) and 2.93 lbs/day of ROC (25.7 percent of total daily ROC construction emissions for the first five months of construction, 42.0 percent for the second five months). Haul trips associated with hauling debris, paving material transport (concrete), and equipment deliveries would result in a relatively small increase in criteria pollutant emissions for mobile equipment, with the exception of NO_x. Haul trip emissions for NO_x would be 27.02 lbs/day for the first five months and 18.02 lbs/day for the second five months (27.0 percent and 40.7 percent of the total daily NO_x construction emissions for the first and second five months, respectively). See Table 4 for daily construction (stationary activities, truck trips, and worker commutes) emissions totals.

Construction activities are not anticipated to generate significant amounts of PM_{10}. The estimated emissions in Table 4 for PM_{10} include dust from site preparation activities and from on-site gasoline and diesel construction equipment. The dust generation factor used (assuming worst-case environmental conditions) is 0.42 tons per acre-month, which is the most recently approved and recommended factor by the SCAQMD for the quantification of dust generation from exposed soils.[4] It is estimated that the construction activities related to exposed soil surfaces would emit a maximum of approximately 19.03 lbs/per day of PM_{10} resulting from dust generation under worst-case conditions, assuming .689 acres of exposed soil at any given time on-site. This represents approximately 78.0 percent of the total PM_{10} emissions projected to result from construction activities

[4] Midwest Research Institute, Improvement of Specific Emission Factors (BACM Project No. 1) Final Report, for SCAQMD (for PM_{10} dust emissions), March 29, 1996.

during the first five months, which is 24.93 lbs/day, including gasoline and diesel emissions (see Appendix C for detailed calculations). As indicated in Table 4, although dust generation accounts for a large percentage of PM_{10} emissions, the daily emissions of this pollutant would be well below the SCAQMD significance threshold.

Table 4
Estimated Air Emissions From Construction

Air Pollutant	First 5 Months Estimated Emissions (lbs/day)	Second 5 Months Estimated Emissions (lbs/day)	SCAQMD Threshold (lbs/day)
Reactive Organic Compounds (ROCs)	11.384	6.968	75
Carbon Monoxide (CO)	256.2	170.25	550
Nitrogen Oxides (NO_x)	99.958	44.24	100
Sulfur Oxides (SO_x)	7.2842	1.197	150
Particulates (PM_{10})	24.376	1.89	150

Source: SCAQMD, *CEQA Air Quality Handbook*, April 1993; EMFAC2001.
Note: *Includes a worst-case dust generation factor of 0.42 tons/acre-month for PM_{10} during site preparation, based on SCAQMD's recommendations for conservative assessment.

As indicated in Table 4, all criteria pollutants would be below SCAQMD significance thresholds for construction activities during both the first and second five months of construction activities. Furthermore, construction emissions would be short-term in nature, and would be limited only to the time period when construction activity is taking place. Additionally, the construction emissions analysis incorporated conservative assumptions. For example, all 30 workers were assumed to drive their own vehicle 60 miles round trip each workday and worst-case conditions for fugitive dust generation were assumed (i.e., high wind conditions with minimal, if any, soil stabilization and an exposed soil area of .686 acres). Further, the proposed project would implement standard SCAQMD-approved construction procedures, such as those provided in Tables 11-2 and 11-3 of the *CEQA Air Quality Handbook* (for exhaust emissions), and comply with provisions of the most recently-adopted SCAQMD Rule 403 (Fugitive Dust), as applicable. With implementation of adopted SCAQMD Rules and procedures, construction-related emissions impacts would not be considered significant and no mitigation is required.

Operation Emissions

Operation of the proposed project would not generate any more emissions than are currently produced on the site. The new administration building will house the same number of employees as the current building, which will no longer be in use. There will be no net increase of vehicles traveling to and from the site on a daily basis. The number of employees working at the various buildings on-site are, and will remain to be, approximately 100. As such, no operational air quality impacts would result from the proposed project and no mitigation is required.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The proposed project is approximately 150 feet from the nearest sensitive receptors (single-family residences), which are located to the northwest. Since daily construction emissions would be below significance thresholds, and construction activities would occur at a minimum distance of approximately 150 feet from the closest sensitive receptors, impacts to nearby residents and/or employees from construction-related air emissions would be minimal and, therefore, less than significant. The operation of the proposed project would not result in a significant impact to sensitive receptors adjacent to the proposed project due to the fact that operation of the proposed project would not generate any more vehicle trips than are currently traveling to and from the site. No significant impacts are anticipated and no mitigation is required.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Any odors (e.g., odors from construction vehicle emissions) will be controlled in accordance with SCAQMD Rule 402 (Nuisance Emissions). Other than construction vehicle operation, no activities are anticipated to occur, and no materials or chemicals would be stored on-site, that would have the potential to cause odor impacts during the construction and operation of the proposed two-story office building. Therefore, no significant odor impacts would occur and no mitigation is required.

IV. BIOLOGICAL RESOURCES

Would the project:

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

No Impact. The proposed project is located in an area that is presently developed with urban uses. No species identified as a candidate, sensitive, or special status species (including but not limited to plants, fish, insects,

animals, and birds) in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service are known to exist on or near the site. Since no known special species have been identified in the proposed project area, there is no potential for substantial adverse direct or indirect effects from construction or operation of the proposed project. No mitigation is required.

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

No Impact. There are no known identified riparian habitats or other sensitive natural communities located in the general vicinity of the proposed project site; therefore, there is no potential for impacts on riparian habitat or other sensitive natural communities. No mitigation is required.

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

No Impact. No federal or nonfederal wetland habitat (including, but not limited to, marsh, vernal pool, coastal, etc.) has been identified or is known to exist on, or in the vicinity of, the proposed project site; therefore, there is no potential for significant construction or operation impacts to wetland habitat from the proposed pipeline. No mitigation is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery/breeding sites?

No Impact. The area surrounding the site is urbanized. The construction and operation of the building would occur on a site currently owned by LADWP and currently used for parking. Therefore, the construction and operation of the proposed project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. Also, there is no native wildlife nursery site in the proposed project area.

e) 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)?

No Impact. See Item f below.

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

No Impact. The proposed project site is located in a developed urban area, and construction activities would take place almost exclusively within existing developed property. There is little to no vegetation currently existing on site. Therefore, no impact is anticipated and no mitigation is required.

V. CULTURAL RESOURCES

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations Section 15064.5?

No Impact. The proposed project would not cause any adverse change to aboveground historical resources (buildings or structures that are eligible for the National Register of Historic Places or the California Register of Historical Resources). No structures would be demolished as a result of the proposed project. No impacts are expected and no mitigation is required.

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

Less Than Significant Impact. The proposed project is located in a highly urbanized area and the proposed project site is on a current parking lot. A field survey was not performed because the proposed project is confined to a paved area that has a history of disturbance. Though the likelihood of encountering any archaeological resource is very low, it is possible during excavation/trenching. Standard Specifications for Public Works Construction (Greenbook) requires that construction in the area of discovery of an archaeological (or paleontological) resource be suspended until appropriate action can be taken. Therefore, adherence to the Greenbook would reduce the potential impact to less than significant and no mitigation is required.

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

Less Than Significant Impact. The proposed project would be located in an area that has already been disturbed. The geologic makeup of the area consists of Quaternary deposits of interbedded clays, silts, and gravelly sands. Located at the western edge of the Los Angeles coastal plain, the proposed project is situated on interbedded deposits of Holocene age clay, silt, sand, and gravelly sand. The alluvium represents material that has been swept down and deposited over time by streams emanating from the southern flank of the nearby Santa Monica Mountains. Proof of this lies in the abundant pieces of Santa Monica slate found in the gravels located at the project site. The Santa Monica slate is a dark gray to black easily identifiable metamorphic rock of possible marine origin that has yielded

Jurassic fossils. The slate is probably related to a similar Jurassic age, fossiliferous slate found in the Santa Ana Mountains. Excavation is not anticipated to affect a unique geologic feature. No impacts to paleontological resources are anticipated; however, subsurface excavations have a remote potential to encounter previously undiscovered paleontological resources. Adherence to the Greenbook would reduce the potential impact of encountering paleontological resources to a less-than-significant level and no mitigation is required.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. The proposed project would not impact known cemeteries, and no evidence of burials exists in the proposed project location. If burials are encountered, the County Coroner will be notified, as required by the Greenbook and state law. The possibility of encountering archaeological artifacts or burials in the proposed project area is low; and adherence to the Greenbook would minimize potential impacts to a less-than-significant level and no mitigation is required.

VI. GEOLOGY AND SOILS

Would the project:

a) 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.

No Impact. The proposed project is not located within the boundaries of any state designated Alquist-Priolo Special Studies Zone.[5] The construction and operation of the proposed project would therefore not expose people or structures to potential adverse effects from the rupture of a known earthquake fault and no mitigation is required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. Seismic activity at area faults may result in ground shaking at the proposed project site. Seismic hazard from ground shaking is typical for many areas of Southern California. At the proposed project site, the potential for seismic activity would not be greater than for much of Los Angeles. Geotechnical investigations for the site concluded that it was a safe location for building construction, and the construction of the facility will incorporate the recommendations

[5] City of Los Angeles, *General Plan, Safety Element Exhibit A,* "Alquist-Priolo Special Studies and Fault Rupture Areas."

of the geology report and addenda. Construction of the proposed project would be in compliance with earthquake-resistant standards required by the LADWP Engineering Standards Manual. Therefore, the proposed project is not expected to increase the risk of exposure of people or structures to impacts from strong seismic ground shaking and no mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Depending on the levels of ground shaking, groundwater conditions, the relative density of soils, and the age of the geologic units in the area, the potential for liquefaction may vary in the City of Los Angeles. Seismic-related ground failure, including liquefaction, occurs when a saturated, granular deposit of low relative density is subject to extreme shaking and loses strength or stiffness due to increased pore water pressure. The consequences of liquefaction are expected to be predominantly characterized by settlement or uplift of structures, and increase in lateral pressure on buried structures. The proposed project site is not located in an area susceptible to liquefaction.[6] Nonetheless, trenches and other excavations would be backfilled with engineered fill, which meets compaction and shear strength requirements, and has little, if any, liquefiable potential. Due to the fact that the proposed project site is not located in an area susceptible to liquefaction and backfilled material would be engineered to meet compaction and shear strength specifications, no impact to the new building from an increase in lateral pressure is anticipated. Therefore, no impacts are anticipated that would expose people or structures to the risk of substantial adverse effects from liquefaction, and no mitigation is required.

iv) Landslides?

No Impacts. Landslides or mudflows are not anticipated to occur in the general area of the proposed project due to the flatness of the terrain. No impacts are expected and no mitigation is required.

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

Less Than Significant Impact. The construction and operation of the proposed project would occur within and around a highly urban area on an existing paved parking lot. During construction, short-term erosion impacts could occur as a result of excavation from construction activities. These exposed soils could potentially cause erosion impacts during windy conditions and from construction vehicles traveling through the site. Heavy rains could cause the exposed soils to run off into public right-of-ways and/or storm drainage systems. The contractor will develop and implement a plan to control erosion of soil from the site during construction. Because

[6] City of Los Angeles, *General Plan, Safety Element Exhibit B*, "Areas Susceptible to Liquefaction in the City of Los Angeles."

the proposed project site has been excavated, significant losses of topsoil are not anticipated. The development and implementation of an erosion control plan would keep impacts resulting from construction to less than significant levels. Once the proposed project is complete, all surfaces that would have been exposed during construction will be repaved, therefore no additional impact on soil erosion or loss of topsoil is expected and no mitigation is required.

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

Less Than Significant Impact. The proposed project area is flat and not located on a geologic unit or soil that is unstable. Lateral spreading, subsidence, and collapse are not expected to occur at the proposed project site because the area was graded when the streets and surrounding uses were originally constructed. As indicated in Item a above, there is no liquefaction or landslide hazard at the site. Therefore, construction and operation of the proposed project would not cause the local geologic unit or soil to become unstable, or result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse and no mitigation is required.

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

No Impact. The proposed project would be located in a highly urbanized area and is currently developed, and construction activities and operation would occur along previously disturbed areas. The soils at the proposed project site consist of interbedded layers of clays and silts. There is some potential for soil expansion however this can be mitigated by proper engineering. The proposed project would be constructed to meet all applicable Uniform Building Code standards. No significant impacts are anticipated.

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

Some Impact. The soils are not capable of supporting a septic tank system; however, the project will be tied to the existing sanitary sewer system. The proposed project area is serviced by a sewer system operated and maintained by the City of Los Angeles Department of Public Works. Construction and operation of the proposed project would not affect any existing, or hinder future, septic tanks or alternative wastewater disposal systems, or the soils that would adequately support those systems. Therefore, no impacts related to soil compatibility with septic systems would occur, and no mitigation is required.

VII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

No Impact. Though construction of the proposed project would involve the excavation and transport of paving materials (e.g., asphalt, concrete) that could possibly be contaminated by vehicle-related pollution (e.g., oil, gasoline, diesel, other automotive chemicals), the proposed project does not involve the routine transport, use, or disposal of hazardous materials. All such materials would be transported and disposed of in accordance with applicable codes and regulations. Such transport and disposal is not expected to create a significant hazard to workers or the community. Operation of the proposed project would not require the use, storage, or disposal of hazardous substances. Therefore, the proposed project would not create impacts related to the routine transport, use, or disposal of hazardous materials, and no mitigation is required.

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

No Impact. Implementation of the proposed project would not involve the use, storage, or disposal of explosive or hazardous substances that could result in an upset and accident condition. Before commencing any excavation, the construction contractor would be required to obtain an "Underground Service Alert Identification Number." To minimize potential damage to any existing utilities, the contractor would not be allowed to excavate until all utility owners are notified, and all substructures are clearly identified. As the proposed project would consist of office space in a two-story office building, operation would not create a significant hazard to the public or environment involving the release of hazardous materials. No reasonably foreseeable upset or accident conditions that could involve the release of hazardous materials into the environment are anticipated during construction or operation. Therefore, no impacts are anticipated and no mitigation is required.

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

Less Than Significant Impact. As discussed in the Air Quality section (starting on Page 3-8), construction equipment emit air contaminant emissions. None of these emissions are going to be generated at levels that are considered hazardous. Construction of the proposed project would also involve the excavation and transport of paving materials (e.g., asphalt, concrete, road bed fill materials) that could possibly be contaminated by

vehicle related pollution (e.g., oil, gasoline, diesel, other automotive chemicals). All such materials would be transported and disposed of in accordance with applicable codes and regulations. Such transport and disposal is not expected to involve acutely hazardous materials, substances or waste. Operation of the proposed project would not involve hazardous emissions or materials. No impacts to schools are anticipated and no mitigation is required.

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

No Impact. Government Code Section 65962.5 refers to a list of facilities that may be subject to the Resource Conservation and Recovery Act (RCRA) corrective action program. The WLAHQ Administration Building site is not listed on the RCRA Information System (RCRIS) online database.[7] The proposed project, which is a new two-story office building on an existing site would not create a significant hazard to the public or the environment. No significant impacts are anticipated and no mitigation is required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

See Item f below.

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

No Impact. The proposed project is not located within an airport land use plan. The closest airport/airstrip to the proposed project site is the Santa Monica Airport (a public airport), located approximately 1.5 miles southeast of the proposed project site. As such, construction of the proposed project would not affect airport activities, it would not result in a safety hazard for people residing or working in the proposed project area. Once operational, the proposed project would provide office space for approximately 100 employees, the same amount currently working on the site. Therefore, neither construction nor operation of the proposed project would impact on airport operations or pose a safety hazard and no mitigation is required.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

[7] United States Environmental Protection Agency. *Envirofacts Data Warehouse, RCRAInfo Database*. Website: *http://www.epa.gov/enviro/html/rcris.* Accessed June 16, 2003.

No Impact. The proposed project would not impair or physically interfere with an adopted emergency response plan or a local, state, or federal agency's emergency evacuation plan. The on-site construction activities and delivery/haul operations would conform to all City of Los Angeles Department of Transportation (LADOT), Los Angeles Police Department (LAPD), and Los Angeles Fire Department (LAFD) access standards to allow adequate emergency access. Once operational, the proposed project would provide office space for approximately 100 employees, and its operation would not interfere with emergency response or evacuation plans. No impacts are expected and no mitigation is required.

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

Less Than Significant Impact. According to the City of Los Angeles General Plan Safety Element, the proposed project site is not located within a wildfire hazard area.[8] No significant areas of brush, grass, or trees are located in the proposed project area. The area is highly urbanized and not in close proximity to any wildlands. Construction of the proposed projects would not substantially increase risks to people or structures from wildland fires. Therefore, impacts would be less than significant and no mitigation is required.

VIII. HYDROLOGY AND WATER QUALITY

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The purpose of the proposed project is to provide a newer, more modern, and safer office space for the employees of the WLAHQ. The construction and operation of the proposed project would not generate any wastewater or increase urban runoff into existing storm drains. It is anticipated that dewatering will not be required for the construction of the proposed project due to the shallow depth at which subsurface structures would be placed and the elevation of the site. All water from dewatering activities would be tested and discharged in accordance with all applicable requirements of the Regional Water Quality Control Board. Therefore, no significant impacts to water quality from construction or operation are anticipated and no mitigation is required.

[8] City of Los Angeles, *General Plan, Safety Element Exhibit D,* "Selected Wildfire Hazard Areas In the City of Los Angeles."

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

No Impact. During construction, the only groundwater that the proposed project has the potential to deplete would be from dewatering activities, if required. Preliminary field exploration, however, has encountered groundwater at 44 feet below the existing surface, and so dewatering is not expected to be required. The proposed project would serve to increase the safety and comfort of employees of the WLAHQ, and would not contribute to the depletion of groundwater supplies, interfere substantially with groundwater recharge, or lower the level of the groundwater table. As such, no significant adverse impacts to groundwater supply or recharge are expected and no mitigation is required.

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

See Item d below.

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

Less Than Significant Impact. The proposed project is located in a developed area with no water bodies on-site or the immediate surroundings. The construction and operation of the new two-story office building would occur within an existing urban site and is not expected to alter the existing grade or drainage pattern of the area. Certain components may generate runoff during and following storm events that would include various types of compounds commonly found in an urban environment, such as petroleum products, pesticides, etc. Because the site is currently developed with structures or have previously been graded and will be converted to other urban uses, there would be minimal change in the content of storm runoff from these sites. No significant impacts would result from changes in absorption rates, drainage patterns, or the rate and amount of surface runoff for these components. No stream or river course would be altered due to the proposed project. Construction activities are not expected to substantially increase the rate or amount of surface runoff, or result in flooding on- or off-site. Therefore, impacts would be less than significant and no mitigation is required.

e) 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. Dewatering for this project is highly unlikely, as the groundwater is at a depth of 44 feet. Therefore, no discharge of water is expected that would exceed the capacity of existing drainage. Furthermore, as mentioned above, the discharge water is not anticipated to contain significant quantities of contaminants, and would be of limited volume. Construction of the proposed project would involve grading, excavation, and hauling of materials off-site. These activities may have the potential to result in short-term soil erosion that could affect off-site storm drains. Impacts would be less than significant. Operation of the proposed project would not be expected to create or contribute runoff water in an amount which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted water. Consequently, impacts to stormwater systems from increased runoff volumes or polluted runoff due to construction or operation of the proposed project would be less than significant and no mitigation is required.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. Potential short-term erosion effects could occur during excavation and construction activities, which could affect surface water quality. However, due to the localized nature of the proposed project and limited area of ground disturbance within the existing facility, this effect is expected to be minimal. If dewatering is necessary during construction, the water would be treated, as necessary, and discharged into the nearby storm drain system. A less than significant impact is anticipated relative to water quality and no mitigation is required.

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

See Item i below.

h) Place within a 100-year flood area structures to impede or redirect flood flows?

See Item i below.

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

Less Than Significant Impact. The proposed project site does not lie within a 100-year flood zone.[9] Additionally, the proposed project site is not

[9] City of Los Angeles, *General Plan Safety Element Exhibit F*, "100-Year & 500-Year Flood Plains in the City of Los Angeles."

located in an area of potential inundation (from failure of upstream dams)[10]; therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving flooding. This is due to the fact that the proposed project would not increase the risk from inundation over what is currently experienced by existing local residents and employees, since the proposed project would not involve new populations or sizeable aboveground structures. Therefore, no flooding impacts are expected and no mitigation is required.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. The proposed project is not subject to tsunami-related inundation as it is not located within the range of a seiche hazard zone or tsunami hazard zone.[11] In addition, the proposed project site is not located in an area subject to mudflows. Therefore, the potential impacts to, or from, the construction and operation of the proposed project from inundation by seiche, tsunami, or mudflow is very low and no mitigation is required.

IX. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. Construction impacts from the proposed project would be short-term and would be confined to the existing WLAHQ site. Though construction activities would traverse through established communities, the proposed project would not physically divide any communities because access along Nebraska Street would be maintained during construction activities, and any limitations to access would be temporary in nature. Since the proposed project would operate at the existing grounds of the WLAHQ, it would not physically divide the community. No impacts are expected and no mitigation is required.

b) 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. Construction and operation of the proposed project would occur exclusively within an existing LADWP facility; as such, no effects on any land uses on or near the project site, or conflicts with any General Plan designations or zoning ordinances, are anticipated. Consequently, impacts to land use plans, policies, and regulations would be less than significant and no mitigation is required.

[10] City of Los Angeles, *General Plan Safety Element Exhibit G*, "Inundation & Tsunami Hazard Areas in the City of Los Angeles."
[11] City of Los Angeles, *General Plan Safety Element Exhibit G*, "Inundation & Tsunami Hazard Areas in the City of Los Angeles."

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The land uses in the immediate vicinity of the proposed project site are residential, commercial, and public facility uses. No known habitat or natural communities conservation plans exist for the proposed project area. Therefore, the construction and operation of the proposed project would not conflict with, or otherwise adversely impact, any habitat or natural communities conservation plans, and no mitigation is required.

X. MINERAL RESOURCES

Would the project:

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

Less Than Significant Impact. Development of the proposed project would involve the use of construction materials, which includes negligible quantities of non-renewable resources. Construction of the proposed project would follow industry standards and would not use non-renewable resources in a wasteful or inefficient manner. No mineral resources that are of value to the region or residents of the state have been identified in the vicinity of the proposed project site. The proposed project is not located within a Significant Mineral Aggregate Resources Area as designated by the State of California Department of Conservation. Therefore, the proposed project would not result in the loss of availability of any mineral resource that would be of value to the region and the residents of the state. Once constructed, operation of the proposed improvements would not affect known mineral resources. Impacts to known mineral resources (e.g., sand, gravel, and petroleum fuels) from construction and operation are expected to be less than significant and no mitigation is required.

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

No Impact. The proposed project is not located in an area designated as containing locally important mineral resources.[12] Therefore, the construction and operation of the proposed project would not result in the loss of availability of any mineral resource and no mitigation is required.

XI. NOISE

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

[12] City of Los Angeles Department of Planning. *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report*. January 1995.

Less Than Significant Impact. Sound is defined as any pressure variation detected by the human ear. Noise is defined as any unwanted sound. The preferred unit for measuring sound is the decibel (dB). The dB expresses the logarithmic ratio of the amount of energy radiating from a source in the form of an acoustic wave.

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. Sound intensity is measured in decibels that are A-weighted (dBA) to correct for the relative frequency response of the human ear. L_{eq} is the equivalent sound level, which is used to describe average noise levels over a specified period of time. On average, noise attenuates (lessens) at a rate of 6 dBA for every doubling of distance from a source, depending on environmental conditions (e.g., atmospheric conditions, noise barriers, ground covering, etc.).

The proposed project is located within the City of Los Angeles and is thus subject to the General Plan and noise ordinances incorporated therein. Section 41.40 of Chapter IV, Article 1 of the Los Angeles Municipal Code indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. on any day. No person, other than an individual homeowner engaged in the repair or construction of his single family dwelling, shall perform any construction or repair work of any kind before 8:00 a.m. or after 6:00 p.m. on any Saturday or federal holiday, nor at any time on Sunday. If construction is required beyond that allowed under the Municipal Code or noise ordinance, permission will be obtained from the Board of Police Commissioners prior to engaging in construction activities outside the prescribed hours.

Chapter XI, Article 2, Section 112.05 of the Los Angeles Municipal Code specifies the maximum noise levels of powered equipment or powered hand tools. Any powered equipment or hand tools for construction that produce a maximum noise level exceeding 75 dBA at a distance of 50 feet between the hours of 7:00 a.m. and 10:00 p.m. in any residential zone of the City or within 500 feet thereof shall be prohibited. However, the above noise limitation shall 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 devices or techniques during the operation of the equipment.

The proposed project is located in an area consisting of residential, commercial, and public facilities uses. The nearby residences, which qualify as noise-sensitive land uses, would be exposed to noise generated from on-site construction activities. The proposed project consists of the construction of a two-story office building at the WLAHQ site. The proposed project is located within the City of Los Angeles in a highly urban area in the community of West Los Angeles. Residential units are located to the northwest. Construction equipment could operate as close as approximately

200 feet (in flat distance) to the residences along Nebraska Avenue and the nearby streets branching off from Nebraska near the proposed project site. The most proximate of these residents are located along Wellesley Avenue at a distance of about 200 feet. These residents are also subject to noise generated by traffic traveling along Nebraska Avenue and Bundy Drive to the northeast.

The proposed project is located within the City of Los Angeles and is thus subject to its General Plan and noise ordinances, as described above. With respect to an increase in noise due to proposed project construction, the Draft L.A. CEQA Thresholds Guide[13] (Thresholds Guide) indicates that a project would normally have a significant impact on noise levels if: (1) construction activities lasting more than one day would exceed ambient exterior noise by 10 dBA or more at a noise sensitive use; (2) construction activities lasting more than ten days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or (3) construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m., Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at anytime on Sunday.

As stated previously, the proposed project is the construction of a two-story office building. Noise levels associated with construction activities would be higher than the ambient/existing noise levels of the surrounding proposed project area, but would cease once construction of the proposed project is completed. Two types of noise impacts could occur during the construction phase. First, the transport of workers and equipment to the construction site would incrementally increase noise levels along existing site access roadways. This increase in noise levels would be intermittent and short-term; therefore, the transport of workers and/or equipment to the site would have a less than significant impact on noise sensitive receptors along the truck routes.

The second type of impact is related to noise generated by on-site construction. Local residents could be subject to elevated noise levels due to the operation of construction equipment. Construction activities are carried out in discrete steps, each of which has its own mix of equipment, and consequently its own noise characteristics. These various sequential phases would change the character of the noise levels surrounding the construction site as work progresses.

Table 5 presents typical noise levels produced from the use of construction equipment. Equipment noise is similar during all phases of construction, although the actual construction of structures typically results in less noise than site preparation activities. The grading and site preparation phase tends to create the highest noise levels because the noisiest construction

[13] City of Los Angeles, *Draft L.A. CEQA Thresholds Guide*. May 14, 1998.

equipment is found in the earthmoving equipment category. This category includes excavating machinery and earthmoving and compacting equipment Due to the relatively small footprint of the proposed project, the largest and loudest types of equipment will be minimal and most of the grading work will be done with backhoes, concrete trucks, jack hammers/power augers, and trucks.

Construction noise levels at and near the proposed project site would fluctuate depending on the particular type, number, and duration of use of various pieces of construction equipment. The construction schedule is anticipated to begin in the summer of 2005 and be completed in approximately 12 months. However, the noisiest activities/portion of construction will occur only in the first four to five months. (See description of project construction schedule above starting on page 2-24.) Table 5 shows noise levels associated with various types of construction related machinery.

It is anticipated that the majority of construction would occur entirely within the LADWP property at 12300 Nebraska Avenue and would temporarily generate an increase in ambient noise levels in the proposed project vicinity. The exposure of persons to a periodic increase in ambient noise levels would be short-term and not substantial. Also, construction would be carried out in compliance with the City of Los Angeles Noise Ordinance No. 144.331 (Noise Regulation). The ordinance limits construction time to normal working hours when most residents are away from their homes. Adherence to the ordinance would minimize construction-related noise impacts. Additionally, the measures provided below would further reduce noise impacts.

Table 5
Noise Associated With Typical Construction Equipment

Type of Equipment	Range of Sound Levels Measured (dBA at 50 feet)	Suggested Sound Levels for Analysis (dBA at 50 feet)
Pile Drivers, 12,000-18,000 ft-lb/blow	81-96	93
Rock Drills	83-99	96
Jack Hammers	75-85	82
Pneumatic Tools	78-88	85
Pumps	68-80	77
Dozers	85-90	88
Tractor	77-82	80
Front-End Loaders	86-90	88
Hydraulic Backhoe	81-90	86
Hydraulic Excavators	81-90	86
Graders	79-89	86
Air Compressors	76-86	86
Trucks	81-87	86

Source: *Noise Control for Buildings and Manufacturing Plants*, Bolt, Beranek, and Newman, 1987

Mitigation Measures:

M-1 All construction equipment, stationary and mobile, shall be equipped with properly operating and maintained muffling devices.

M-2 Effective communication with the local residents shall be maintained during construction including keeping them informed of the schedule, duration, and progress of the construction to minimize public complaints regarding noise levels.

No noise is associated with the subsequent operation of the office building; hence there would be no impact from operation of the proposed project and no mitigation is required.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Groundborne vibration is measured in terms of the velocity of the vibration oscillations. As with noise, a logarithmic decibel scale (VdB) is used to quantify vibration intensity. When groundborne vibration exceeds 75 to 80 VdB, it is usually perceived as annoying to building occupants. The degree of annoyance is dependent

upon type of land use, individual sensitivity to vibration, and the frequency of the vibration events. Typically, vibration levels must exceed 100 VdB before any building damage occurs.

It is not anticipated that construction of the proposed project would involve pile-driving activities. The use of jackhammers and/or pavement breakers associated with construction would be brief and therefore would not affect the nearby residences and business for more than a few days. In addition, the use of such equipment would be limited to daytime hours. As a result, although construction of the proposed project would include use of heavy equipment, it is unlikely that construction would result in perceptible, let alone excessive, groundborne vibration or groundborne noise levels. Operation of the proposed project—the use of the building as office space—would not cause substantial groundborne vibration or noise. No significant impacts would occur and no mitigation is required.

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

No Impact. The proposed project consists of the construction of a two-story office building at the current site of the WLAHQ. The new building will house the same number of occupants as the current building (which will be out of commission once the new building is complete) and there will be no change in operational activity. Operation of the existing office building does not produce noise and no operational noise would result from having occupants work in new building. Therefore, no substantial permanent increase in ambient noise levels would occur in the proposed project vicinity above levels existing without the proposed project.

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

Less Than Significant Impact. As discussed in Item a above, construction noise levels at and near the proposed project site would fluctuate depending on the particular type, number, and duration of use of various pieces of construction equipment. Construction would generate an increase in ambient noise levels in the proposed project vicinity. The exposure of persons to the periodic increase in noise levels would be short-term. With adherence to the noise ordinance and the additional measures listed above under Item a, the impact of the proposed project on temporarily increasing ambient noise levels in the proposed project vicinity would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. See Item f below.

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. At a distance of approximately 1.5 miles, the Santa Monica Airport represents the most proximate public use airport to the proposed project. However, the new proposed two-story office building will be built right next to an existing two-story office building that has been in operation with LADWP employees since approximately 1960, as long as the Santa Monica Airport has also been in operation. In addition, the proposed project site is not located within the Santa Monica Airport flight pattern. Therefore, the construction of the proposed project would not expose construction workers or future occupants of the building to excessive aircraft noise levels and no mitigation is required.[14]

XII. POPULATION AND HOUSING

Would the project:

a) 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. Construction and operation of the proposed project, a new two-story office building, would serve to provide a safer and more modern working environment for the current employees of the WLAHQ. No new employees will be coming to the site once the proposed project is complete. As such, the proposed project would not induce population growth in the area, either directly or indirectly. No growth-inducing impacts are anticipated to result from the proposed project, as the project would merely accommodate existing LADWP employees; therefore, no mitigation is required.

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

No Impact. The construction and operation of the proposed project would occur within an existing LADWP facility. No housing is to be removed as part of the proposed project. Therefore, construction and operation of the proposed project would not have any impacts on the number or availability of existing housing in the area and would not necessitate the construction of replacement housing elsewhere; therefore, no mitigation is required.

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

No Impact. As mentioned in Item b above, the construction and operation of the proposed project would not displace any housing, and therefore would

[14] Santa Monica Airport's Noise Management (Fly Neighborly Program). http://santa-monica.org/airport/noise/index.htm

not result in the displacement of people. Therefore, no impact is expected and no mitigation is required.

XIII. PUBLIC SERVICES

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

i) Fire protection?

Less Than Significant Impact. Construction of the proposed project would occur within the existing WLAHQ site, away from the road system. In addition, all construction activities would be carried out in accordance with all applicable LADOT and LAFD emergency access standards, and access would be maintained during construction. Impacts relative to fire services would be less than significant and no mitigation is required.

ii) Police protection?

No Impact. Construction of the proposed project would occur within the existing WLAHQ site, away from the road system. Therefore, the construction of the proposed project would have limited potential to reduce access for emergency vehicles near the proposed project site (i.e., along Nebraska Avenue). Operation of the proposed project would not require additional police protection as there would be no net increase in people coming to the site. No impacts are anticipated to occur relative to police services and no mitigation is required.

iii) Schools?

No Impact. No population increase in the proposed project area would result from the construction and operation of the proposed project. Although some schools exist in the vicinity of the proposed project site, no substantial adverse physical impact to local schools from construction and operation of the proposed project would occur, and no mitigation is required.

iv) Parks?

No Impact. The construction and operation of the proposed project would not generate any additional population that would increase demand for neighborhood or regional parks or other recreational facilities. Accordingly, no adverse physical impact to parks would result, and no mitigation is required.

v) Other public facilities?

No Impact. The construction and operation of the proposed project is not expected to result in adverse physical impacts associated with any other public facilities in the area or in the City of Los Angeles as a whole. No impacts are anticipated and no mitigation is required.

XIV. RECREATION

Would the project:

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

No Impact. Neither the construction nor operation of the proposed project would generate any additional population that would increase the use of existing neighborhood or regional parks or other recreational facilities. Therefore, no impacts to existing neighborhood and regional parks or other recreational centers are anticipated, and no mitigation is required.

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

No Impact. The proposed project involves the construction of a new two-story office building to replace an old one. Construction and operation of the proposed project would not include recreational facilities or require construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. No impacts are expected and no mitigation is required.

XV. TRANSPORTATION/TRAFFIC

The proposed project consists of constructing a new two-story office building at the site of the WLAHQ. The seven-acre site currently houses a two-story office building, several other miscellaneous structures such as warehouses, a restroom/shower/locker room building, and concrete storage bins as well as approximately 10,754 square feet of paved “open space” areas, part of which is an underutilized parking lot and part of which is “undesignated” space, currently used for miscellaneous storage. Construction of the new administration building would occur on a portion (approximately 1100-square-foot area) of the existing parking area. The remainder of the space would be available for two purposes: to provide parking for the current office building and construction workers to park and for the staging of materials and equipment for the new building construction. Approximately 100 employees report to the building daily, however, a majority of those will receive their work assignments and leave for the field shortly after reporting in and will not return until later in the day. During the hours of 9:00 a.m. – 3:00 p.m., the average occupancy load for employees will be less than 40.

There will be approximately 100 parking spaces available that are immediately adjacent to the proposed administration building. More than half of these will be available to be used by construction employees and construction vehicles. The WLAHQ site also has additional parking available for employees and LADWP truck parking at other areas within the complex. Parking for whatever purpose should not be a problem and will be contained on-site.

Land uses adjacent to the proposed project are primarily single-family residential (along Nebraska Street). The closest school is two miles away and is not directly adjacent to Nebraska Avenue or the proposed project site. No public transportation routes occur along any portion of Nebraska Avenue. The closest public transportation routes are located along Bundy Drive, to the northeast of the proposed project site. (Santa Monica Big Blue Bus Line 10-Freeway Express and Santa Monica Big Blue Bus Line 14 Bundy Drive and Centinela Avenue.)

Would the project:

a) Cause an increase in traffic that 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. For a temporary period during construction, there may be a minor alteration to the current traffic patterns on Nebraska Avenue at Wellesley Avenue (i.e., due to construction traffic entering/exiting the proposed project site), which would entail a flagman and/or signage to caution vehicles on Nebraska Avenue regarding construction vehicles. Under a worst-case traffic scenario for construction activities, for the purposes of this analysis, it is assumed that all 30 workers would drive to and from the site each work day, as well as all mobile construction equipment (e.g., three pick-up trucks, utility truck, and six delivery/haul trucks), and even several pieces of equipment that would typically be considered "stationary" construction equipment (e.g., water truck, two dump trucks, and two concrete trucks). Although extremely unlikely, all the aforementioned vehicles are assumed to drive to and from the site along Nebraska Avenue each workday, which would constitute 40 a.m. and 40 p.m. trips each day. This is not considered a significant traffic impact, since this would not represent a substantial increase in the number of overall trips already occurring along Nebraska Avenue, and furthermore, as mentioned above, these additional trips would occur for only a temporary period during construction activities. At the completion of construction activities at the proposed project facility, traffic operations on Nebraska Avenue would return to normal. Although no substantial adverse traffic effects are anticipated, prior to construction, LADWP would submit the plans for approval to LADOT to ensure that traffic impacts, if any, are kept to a minimum. No significant adverse environmental impacts associated with traffic load and capacity or congestion are anticipated to result from

construction and operation of the proposed project and no mitigation is required.

b) 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 Congestion Management Program (CMP) was created statewide as a result of Proposition 111 and has been implemented locally by MTA. The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed if an Environmental Impact Report (EIR) is being prepared. Although an EIR is not being prepared for the proposed project, an analysis of regional impacts as outlined in the CMP was conducted.

A specific system of arterial roadways plus all freeways comprises the CMP system. A total of 164 intersections are identified for monitoring on the system. Per CMP Transportation Impact Analysis (TIA) Guidelines, a traffic impact analysis is to be conducted:

- At CMP arterial monitoring intersections, including freeway on- or off-ramps, where the proposed project would add 50 or more trips during either a.m. or p.m. weekday peak hours.
- At CMP mainline freeway-monitoring locations, where the project would add 150 or more trips, in either direction, during the either the a.m. or p.m. weekday peak hours.

Under the worst-case construction traffic scenario discussed above in Item a, the proposed project is not expected to add more than 40 a.m. or p.m. weekday peak hours trips, based on 30 workers in a typical 11-hour day driving alone to the proposed project site, as well as daily trips of haul/delivery trucks, other mobile construction equipment, and equipment typically classified as stationary off-road vehicles (e.g., water truck, dump trucks, etc.). Given this worst-case condition, 40 peak-hour trips would be generated by the construction crew, and only for the temporary construction period. Once construction was completed, traffic patterns would return to normal and there would be no net increase in the number of cars entering and exiting the site on a daily basis.

Additionally, no CMP arterial monitoring intersections are located at or near the proposed project, and no freeway on-ramps or off-ramps would be affected by construction activities, aside from the possible use of such facilities by the aforementioned commuting workers.

Construction activities would not add enough peak-hour trips to the existing street system to trigger further analysis set forth by the CMP (i.e., less than 50 daily a.m. or p.m. trips). The construction activities would not occur on the CMP system, and would result in only potential temporary traffic effects at the intersection of Nebraska Avenue and Wellesley Avenue. Therefore,

no impact to CMP-designated roads or highways would occur and no mitigation is required.

c) 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 would not generate air traffic nor affect such activities. No impacts are anticipated and no mitigation is required.

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

No Impact. Construction and operation of the proposed project would cause very minor, temporary changes street/traffic patterns along Nebraska Avenue. These temporary changes to traffic patterns are not anticipated to affect levels of service during the construction phase, and would be temporary and limited to the immediate area in which construction vehicles would enter and exit the WLAHQ Administration Building facility. All changes to traffic patterns, if they were to be deemed necessary (e.g., temporary lane closures and traffic-slowing measures) would be coordinated with LADOT to minimize impacts to motorists, bicyclists, and pedestrians. However, as this is a relatively small proposed project and all staging and construction activities would occur with in the proposed project site (and not on nearby streets) the impact is expected to be minimal to none. No design features (e.g., sharp curves or dangerous intersections) or incompatible uses are proposed as part of this proposed project. As such, no impacts are anticipated and no mitigation is required.

e) Result in inadequate emergency access?

Less Than Significant Impact. The proposed project would not hinder emergency access to the WLAHQ Administration Building facility, except for short-term periods during construction when construction vehicles would be traveling along Nebraska Avenue. As mentioned above, all construction activities would be carried out in accordance with LADOT, LAFD, and LAPD emergency access requirements, as necessary, and access would be maintained during construction activities. No significant emergency access impacts are expected, and no mitigation is required.

f) Result in inadequate parking capacity?

Less Than Significant Impact. Any temporary lane closures resulting from construction activities, though unlikely, would result in short-term loss of parking capacity along affected sections of Nebraska Avenue. Such parking deficits, if they were to occur, would be temporary and would not affect the overall parking capacity in proximity to the site, as the existing on-street parking along Nebraska Avenue and the nearby cross streets is currently underutilized. The operation of the proposed improvements would not

generate any more vehicle trips than currently occur to the site of the WLAHQ building site. Parking, although in a different physical location within the boundaries of the seven-acre site will still be available for employees during and after construction. No significant impacts would occur and no mitigation is required.

g) Would the project conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

No Impact. The proposed project would not conflict with adopted policies supporting alternative transportation. As discussed above, construction activities would be coordinated with LADOT in order to minimize impacts to alternative transportation facilities (e.g., bike lanes). Access to bike lanes would be maintained throughout construction, as required by LADOT. As a result, no impacts would result from the proposed project and no mitigation is required.

XVI. UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. The proposed project would not result in changes to facilities or operations at existing wastewater treatment facilities. Consequently, no modification to a wastewater treatment facility's current wastewater discharges would occur; hence, no impact to wastewater treatment requirements of the applicable Regional Water Quality Control Board would occur and no mitigation is required.

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

No Impact. It is not anticipated that the construction and operation of the proposed project would generate wastewater, and would therefore not require the construction of new water or wastewater treatment facilities or expansion of existing facilities. No impacts are anticipated and no mitigation is required.

c) 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. Stormwater drainage facilities are provided throughout the proposed project area. Construction of the proposed project is not expected to increase stormwater runoff in the proposed project area, since the proposed improvements would be placed on developed surfaces at the existing WLAHQ site. Although unlikely, construction dewatering that may be required during construction would be temporary in nature and the

amount of dewatering discharge would not exceed the capacity of the existing stormwater drainage facilities, nor require new or expanded facilities of this type. The construction and operation of the proposed project is not anticipated to require, or indirectly result in, the construction of new stormwater drainage facilities or the expansion of existing facilities. Therefore, no impacts are expected and no mitigation is required.

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

No Impact. The proposed project is a water supply project that would store treated potable water as part of the existing LADWP water supply infrastructure and serve the area from existing entitlements and resources. No new or expanded entitlements would be needed during construction or operation of the proposed project. No water supply impacts would result and no mitigation is required.

e) 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. Construction and operation of the proposed project would not generate wastewater or otherwise require wastewater treatment capacity. No impacts to wastewater treatment capacity are anticipated and no mitigation is required.

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

Less Than Significant Impact. Excavation and construction debris would be recycled or transported to the nearest landfill site and disposed of appropriately. It is anticipated that the construction contractor will work with the City of Los Angeles' Recycling Coordinator to ensure that source reduction techniques and recycling measures are incorporated into proposed project construction. The amount of debris generated during project construction is not expected to significantly impact landfill capacities. Operation of the two-story office building would not generate any solid waste. No significant impacts to landfill capacity are anticipated and no mitigation is required.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. As mentioned above in Item f, construction debris would be recycled or disposed of according to local and regional standards, and operation of the proposed project would not generate any solid waste. As such, no significant impacts related to compliance with solid waste statutes and regulations are expected and no mitigation is required.

MANDATORY FINDINGS OF SIGNIFICANCE

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. The analysis conducted in this Initial Study results in a determination that the proposed project, either individually or cumulatively, would not have a significant effect on the local environment. The proposed project would involve the construction of a new two-story office building that will serve as the office space/headquarters of the WLAHQ office employees. The building will replace the use of a current, 44-year-old building and provide a safer, more modern working environment. The proposed project would occur in a currently developed area and the proposed project site is devoid of significant fish, wildlife, and/or plant populations. The location of the new building, as well as the surrounding staging area, is currently paved and devoid of vegetation. As such, the proposed project site does not possess significant resource value for foraging bats or avian species. Accordingly, the proposed project would not have the potential to degrade the environment in this regard. Furthermore, because the site has been previously graded and occupied as a parking lot, the likelihood of disturbing significant, if any, cultural resources is considered remote. It is hereby found that the proposed project involves no potential for any impacts, either individually or cumulatively, on wildlife resources and cultural resources, and no mitigation is required.

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.)

No. As discussed in the respective issue areas, the proposed project would have minor, or less than significant, impacts to some environmental resources. The implementation of the identified project-specific mitigation measures and compliance with applicable codes, ordinances, laws and other required regulations, would reduce the magnitude of any impacts associated with construction activities to a level of less than significant. Thus, for the reasons set forth below, impacts would not be cumulatively considerable.

Although current and probable future projects located near the proposed project cannot be ascertained based on available data, it is reasonable to assume that the projects with the potential to contribute to cumulative impacts would be those projects occurring concurrent with, and in proximity to, the proposed project. Such projects, as may be determined at this level of planning, would be private residential developments or other utility projects being undertaken by LADWP in

the proposed project area at the time of construction activities. The construction impacts of these projects, as well as those of the proposed project (as discussed above), would be temporary in nature, and would be limited to the area in which construction activities are occurring. Given that these projects would be coordinated by LADWP, it can be anticipated that LADWP would initiate construction of each project in a manner such that construction activities associated with different projects would occur either at different times, or at sufficient distance from one another as to avoid cumulative effects relative to air quality, noise, and traffic.

With regard to air quality, the SCAQMD has established incremental emissions thresholds to determine whether a project will contribute to significant impacts. Because the proposed project would contribute emissions at rates well below SCAQMD significance thresholds, and given the aforementioned assumption that related LADWP projects would be coordinated as to avoid cumulative impacts in any one area (at any given time), it is anticipated that the air quality impacts of the proposed project and other related projects would not be cumulatively considerable.

Noise impacts, similar to those related to air quality, would be dependent on the timing and location of related project construction in conjunction with the construction of the proposed project. As such, assuming that LADWP would phase such projects to avoid, to the extent feasible, concurrent construction activities in any one location, it can be concluded that noise impacts of the proposed project and related projects (given project-specific noise impacts are less than significant) would not result in noise impacts that are cumulatively considerable.

With regard to traffic, construction activities generate truck traffic and vehicular traffic associated with construction workers. Impacts resulting from the proposed project's construction traffic would be temporary and are not expected to be significant, as discussed above. Traffic impacts of the proposed project, in conjunction with those of the related LADWP projects, would be minimized by coordination with LADOT, which is required to maintain proper levels of service and the overall function of the City’s transportation network. Given that all LADWP projects are subject to review by LADOT (when traffic system components or function are affected), it is assumed that LADOT would require that LADWP coordinate its projects such that the traffic system and levels of service in any one area are maintained. Review by, and coordination with, LADOT would preclude the possibility of cumulative traffic impacts resulting from proposed project and related project construction activities. Based on the above, the proposed project is not anticipated to result in traffic impacts that are cumulatively considerable.

Therefore, no impacts under this category are anticipated and no mitigation is required.

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

No. The proposed project would have no adverse effects on human beings other than the beneficial effect of providing a more reliable water supply for existing LADWP water service customers. Therefore, the proposed project is not anticipated to have a direct or indirect substantial adverse effect on human beings and no mitigation is required.

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SECTION 4.0

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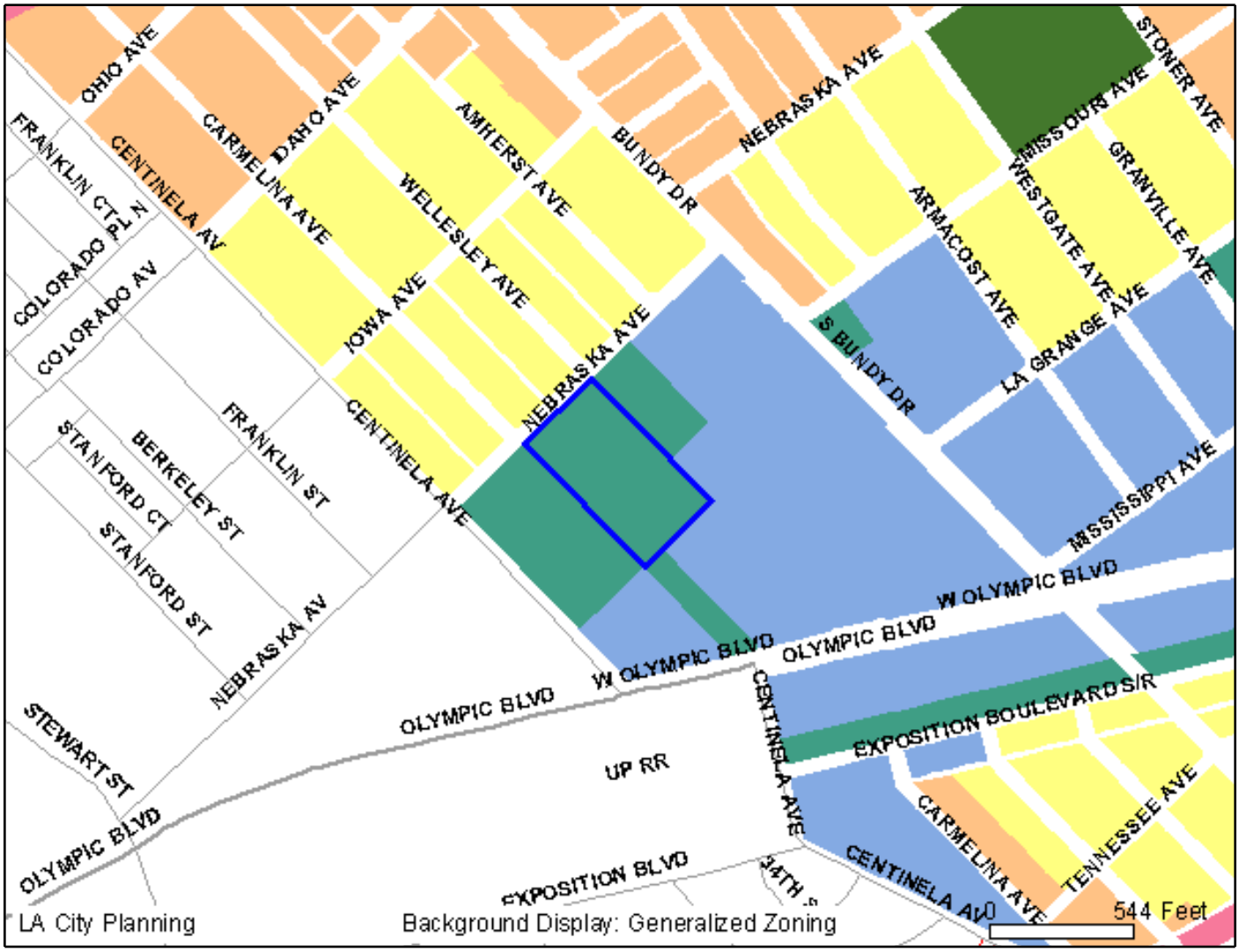
APPENDIX A

ZIMAS (Zone Information Map Access System) Map of the Project Site

ZIMAS INTERNET

09/03/2004

City of Los Angeles
Department of City Planning



Generalized Zoning

- OS
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, R4, R5
- ADP, C1, C1.5, C2, C4, C5, CR, CW, LASED, WC
- CM, MR, CCS, M1, M2, M3, SL
- P, PB
- PF
- HILLSIDE

Property Information

Address:	**12300 W NEBRASKA AVE**
APN:	**4259018902**
Tract:	**SANTA MONICA-SAWTELLE TRACT**
Block:	**None**
Lot:	**FR 20**
Arb:	**None**
PIN #:	**123B145 275**
Zoning:	**[Q]PF-1XL**
General Plan:	**Public Facilities**

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LOS ANGELES CITY PLANNING DEPARTMENT

APPENDIX B

Air Quality Factors, Assumptions, and Calculations

West Los Angeles Administration Building IS/MND
Air Quality Calculations Summary
(First 5 Months of Construction)

Table 1: Summary or Daily Exhaust Emissions (pounds per day)

Table 1a. Off-Road Construction Equipment

		Emissions Factors (pounds/hour)							Emissions (Pounds Per Day)				
Activity	Equipment Name	ROC	CO	NO_X	SO_X	PM_{10}	Number of Vehicles	Daily Hours of Operation	ROC	CO	NO_X	SO_X	PM_{10}
Asphalt breakup/removal	bulldozer	0.095	0.201	0.83	0.076	0.059	1	4	0.38	0.804	3.32	0.304	0.236
Asphalt breakup/removal	backhoe	0.23	0.572	1.9	0.182	0.17	1	2	0.46	1.144	3.8	0.364	0.34
Loading Debris	bulldozer	0.095	0.201	0.83	0.076	0.059	1	4	0.38	0.804	3.32	0.304	0.236
Jack Hammering	air compressor	0.15	0.675	1.7	0.143	0.14	2	4	1.2	5.4	13.6	1.144	1.12
Sweeping	truck	0.19	1.8	4.17	0.45	0.26	1	1	0.19	1.8	4.17	0.45	0.26
Trenching	tracked tractor	0.12	0.35	1.26	0.14	0.112	1	2	0.7	0.7	2.52	0.28	0.224
Asphalt Paving	paving machine	0.065	0.3	0.87	0.067	0.05	1	2	0.6	0.6	1.74	0.134	0.1
Slabs/Footings	concrete truck	0.19	1.8	4.17	0.45	0.26	3	3	1.71	16.2	37.53	4.05	2.34
								TOTALS	5.62	27.452	70	7.03	4.856

Assumptions: All equipment is diesel operated
For calculation purposes, the backhoe is treated as a wheeled loader, the bulldozer is treated as a tracked loader, the paving machine is treated as a roller, and the air compressors are treated as miscellaneous
Source: Table A9-8-A, SCAQMD CEQA handbook

Table 1b. On-Road Construction Equipment

		Emissions Factors (pounds/mile)							Emissions (Pounds Per Day)				
Activity	Equipment Name	ROC	CO	NO_X	SO_X	PM_{10}		Daily VMT	ROC	CO	NO_X	SO_X	PM_{10}
Travel	Construction worker vehicles (30)	0.001626	0.015165	0.001634	0.00001	0.0000079		1800	2.93	27.30	2.94	0.02	0.01
Hauling debris	truck (3)	0.002955	0.20984	0.028142	0.000246	0.0005		480	1.42	100.72	13.51	0.12	0.24
Cement Delivery	truck	0.002955	0.20984	0.028142	0.000246	0.0005		160	0.47	33.57	4.50	0.04	0.08
Materials Delivery	truck (2)	0.002955	0.20984	0.028142	0.000246	0.0005		320	0.95	67.15	9.01	0.08	0.16
								TOTALS	5.76	228.74	29.96	0.25	0.49

Assumptions: VMT's are estimated assuming all workers will arrive at staging area then proceed to construction activities. Assumed 60 miles per worker commute per day for 30 workers. Also assumed delivery/haul trips by large trucks (>8500 pounds) would occur 4 times a day at a distance of 40 miles round trip (to or from equipment/supply facility and/or fill material disposal sites).
Source: Highest (Most Conservative) EMFAC 2002 (version 2.2) Emission Factors for On-Road Vehicles. Scenario Year 2005 was used. (www.aqmd.gov/CEQA/handbook/onroadEF03_25.xls)

Table 2: PM_{10} Dust Emissions from Construction

Conditions	Area of Ground Disturbance	Dust Generation Factor	Conv. Factor	Dust Generation (lbs/day)
Average	0.689	0.11 tons/acre-month	2000 lbs/ton	4.98
Worst-Case	0.689	0.42 tons/acre-month	2000 lbs/ton	19.03

Assumptions: For the purpose of this analysis, it is assumed that a maximum of 30,000 feet (.689 acre) would be exposed at any given time during construction. Pounds per day conversion assumed 10 months (301 days) or 30.4 days per month
Source: Midwest Research Institute, Improvement of Specific Emission Factors (BACM Project No. 1) Final Report , for SCAQMD (for PM_{10} dust emissions), March 29, 1996.

	ROC	CO	NO_X	SO_X	PM_{10}
TOTAL EMISSIONS:	11.38	256.20	99.96	7.28	24.38
SCAQMD THRESHOLD:	75.00	550.00	100.00	150.00	150.00
EXCEEDANCE:	no	no	no	no	no

West Los Angeles Administration Building IS/MND
Air Quality Calculations Summary
(Second 5 Months of Construction)

Table 1: Summary or Daily Exhaust Emissions (pounds per day)

Table 1a. Off-Road Construction Equipment

		Emissions Factors (pounds/hour)							Emissions (Pounds Per Day)				
Activity	Equipment Name	ROC	CO	NO_X	SO_X	PM_{10}	Number of Vehicles	Daily Hours of Operation	ROC	CO	NO_X	SO_X	PM_{10}
Sweeping	truck	0.19	1.8	4.17	0.45	0.26	1	1	0.19	1.80	4.17	0.45	0.26
Unloading Materials	forklift	0.17	0.52	1.54	-	0.093	2	4	1.36	4.16	12.32	-	0.74
Roof Construction	crane	0.15	0.675	1.7	0.143	0.14	1	4	0.60	2.70	6.80	0.57	0.56
								TOTALS	2.15	8.66	23.29	1.02	1.56

Assumptions: All equipment is diesel operated
For calculation purposes, the backhoe is treated as a wheeled loader, the bulldozer is treated as a tracked loader, and the crane and air compressors are treated as miscellaneous. The forklift is assumed to be 175 Hp. Note, there is no SO_X factor for a forklift in table used.
Source: Table A9-8-A, SCAQMD CEQA handbook

Table 1b. On-Road Construction Equipment

		Emissions Factors (pounds/mile)						Emissions (Pounds Per Day)				
Activity	Equipment Name	ROC	CO	NO_X	SO_X	PM_{10}	Daily VMT	ROC	CO	NO_X	SO_X	PM_{10}
Travel	Construction worker vehicles	0.001626	0.015165	0.001634	0.00001	0.0000079	1800	2.93	27.30	2.94	0.02	0.01
Hauling debris	truck (2)	0.002955	0.20984	0.028142	0.000246	0.0005	320	0.95	67.15	9.01	0.08	0.16
Materials Delivery	truck (2)	0.002955	0.20984	0.028142	0.000246	0.0005	320	0.95	67.15	9.01	0.08	0.16
							TOTALS	4.82	161.59	20.95	0.18	0.33

Assumptions: VMT's are estimated assuming all workers will arrive at staging area then proceed to construction activities. Assumed 60 miles per worker commute per day for 30 workers. Also assumed delivery/haul trips by large trucks (>8500 pounds) would occur 4 times a day at a distance of 40 miles round trip (to or from LADWP equipment/supply facility and/or fill material disposal sites).
Source: Highest (Most Conservative) EMFAC 2002 (version 2.2) Emission Factors for On-Road Vehicles. Scenario Year 2005 was used. (www.aqmd.gov/CEQA/handbook/onroadEF03_25.xls)

	ROC	CO	NO_X	SO_X	PM_{10}
TOTAL EMISSIONS:	6.97	170.25	44.24	1.20	1.90
SCAQMD THRESHOLD:	75	550	100	150	150
EXCEEDANCE:	no	no	no	no	no