

William Lamborn  
Major Projects  
Department of City Planning  
200 N. Spring Street, Rm 750  
Phone: 213.978.1470

Dear Mr. Lamborn,

In preparation for the City Council Hearing on the 4051 South Alameda Street Project (Project), Sapphos Environmental, Inc. has prepared an updated overview of applicable noise impacts assessments pertinent to the Project. Project impacts related to noise were evaluated under the California Environmental Quality Act (CEQA) based, in part, on the Noise Technical Report for the proposed project, which was included in this Initial Study as Appendix IS-1. Noise at the proposed project site was evaluated with regard to the Noise Element of the City of Los Angeles (City) General Plan,<sup>1</sup> the City's Noise Regulation outlined in Chapter XI of the Los Angeles Municipal Code (LAMC),<sup>2</sup> the City's CEQA Threshold Guide,<sup>3</sup> and the Federal Transit Authority's (FTA) guidelines for assessing vibration impacts.<sup>4</sup> Impacts to noise were found to be less than significant and the section was not carried forward for further analysis in the EIR.

### ***Off-Site Traffic Noise Impacts***

As discussed in Section 2.6.3.3, *Traffic* of the Noise Technical Report attached as Appendix IS-1 to the Initial Study, the Traffic Impact Study concluded that Alameda Street experiences the highest average daily volume for traffic conditions at 13,500 vehicles per day, and 41st Street experiences the lowest average daily volume at 5,000 vehicles per day. The Traffic Impact Study also concluded that the proposed project, using the Institute of Traffic Engineers (ITE) modelling assumptions would result in a maximum daily trip equivalent of approximately 1,710 total vehicle trips per day.

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<sup>1</sup> Los Angeles City General Plan. February 1999. *Noise Element*. Prepared by: Department of City Planning. Los Angeles, CA.

<sup>2</sup> *City of Los Angeles Municipal Code*, Chapter XI, *Noise Regulation*.

<sup>3</sup> City of Los Angeles. 2006. *L.A. CEQA Thresholds Guide*. Prepared by: Environmental Affairs Commission and the Environmental Affairs Department. Los Angeles, CA.

<sup>4</sup> Federal Transit Administration. May 2006. *Transit Noise and Vibration Impact Assessment*. Washington, DC.

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The estimated maximum daily trips include 342 truck trips. The modelling of anticipated noise levels for heavy trucks was based on the *ITE* worst case scenario of trucks traveling at a speed of 35 miles per hour (mph) (the speed limit on access routes to proposed project site). This analysis resulted in a determination of maximum probable noise levels of 82 dBA at a distance of 50 feet.<sup>5</sup> Ambient noise levels in close proximity to sensitive receptors were recorded at 87.3 dBA for monitoring location A5, 85.5 dBA for monitoring location A6, and 90.0 dBA for monitoring location A7. Therefore, heavy trucks associated with the proposed project would typically be below the ambient conditions at sensitive receptors for heavy trucks if traveling at the speed limit of 35 mph. As a result, the noise impacts from the increase in heavy trucks in the vicinity of the proposed project would be intermittent and would not increase average ambient noise levels above existing conditions. Therefore, noise impacts associated with increased traffic volumes at the proposed project site would be less than significant.

### *Cumulative Noise Impacts*

As discussed in Section 2.7, *Cumulative Impacts*, of the Noise Technical Report, potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity of the construction site. The proposed project is not located within 1,000 feet of a related project. The project site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from a number of community noise sources including heavy vehicular traffic, mechanical equipment, and industrial noise associated with adjacent land uses. Each of the identified related projects that have been identified within the general vicinity of the proposed project site would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. Although Noise was not carried forward, the Initial Study evaluated three related projects consisting of an apartment complex, a shopping center, and a warehouse located within a 1.5-mile radius of the project. Based on the highest ambient noise measurement of 90.0 dBA recorded within 50 feet of sensitive receptors in project study area, noise attenuation from related operational noise and off-site traffic would be below 64 dBA at 1,000 feet. Therefore, due to their distance from the proposed project site, the three related projects were found not to contribute to long-term operational noise impacts.<sup>6</sup>

### *Operational Noise Impacts*

As discussed in the Section 12, *Operational Noise*, of the Initial Study, the proposed project's ongoing operation would require building mechanical equipment to ventilate the indoor air quality and provide power for everyday operations. The proposed project's mechanical equipment would be designed to comply with the City's Noise Regulation requirements and a significance threshold of 5 dBA above the ambient noise levels.

The greatest noise level generated by typical building equipment at a distance of 50 feet is 61 dBA, which is below the significance threshold of 73.3 dBA.<sup>7</sup> According to the OSHA Technical Manual for Noise, apparel manufacturing industrial noise measurements were recorded from 817 manufacturing facilities.

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<sup>5</sup> Cowan, James P. 1994. *Handbook: Environmental Acoustics*. New York, NY: John Wiley & Sons.

<sup>6</sup> Table II.B-1 in the Draft EIR subsequently identified 11 related projects, all of which are located more than 1,000 feet from the proposed project site and none of which would therefore contribute to long term operational noise impacts.

<sup>7</sup> Average ambient noise level at proposed project site (68.3 dBA) + Mechanical Threshold Allowance (5 dBA) = 73.3 dBA.

The median weighted dBA was determined to be 82.73 for all records.<sup>8</sup> Based on the operational equipment analyzed in the Initial Study, the highest dBA recorded for operational noise would be generated from elevators and central station air-conditioning units at 85 dBA at 3 feet which is comparable to the average industrial noise recorded for apparel manufacturing facilities.

Based on these noise levels, and the fact that noise attenuates from a point source at a rate of approximately 6.0 dBA per doubling of distance, the noise impacts on sensitive receptors can be determined by Equation 1 for noise attenuation over distance:

$$(1) \quad L_2 = L_1 - 20 \log_{10} \left( \frac{d_1}{d_2} \right)$$

Where

$L_1$  = known sound level at  $d_1$

$L_2$  = desired sound level at  $d_2$

$d_1$  = distance of known sound level from the noise source

$d_2$  = distance of the sensitive receptor from the noise source

The average industrial noise generated from apparel manufacturing at a distance of 50 feet would be 58 dBA, which is well below the significance threshold of 73.3 dBA.<sup>9</sup> Noise generated from mechanical equipment is generally absorbed and or sheltered by on-site structures and buildings, further reducing noise levels. The nearest sensitive receptor is 153 feet away from the proposed project site. Therefore, operational noise impacts associated with mechanical equipment would be less than significant.

The proposed surface parking lot on the proposed project site would generate some noise during operation of the proposed project. Potentially audible sources of noise from the surface parking (activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals) typically range from about 30 to 66 dBA and are generally short-term and intermittent. The greatest potential noise level generated by typical parking lot sources at a distance of 50 feet is 66 dBA, which is below the significance threshold of 78.3 dBA.<sup>10</sup> Therefore, operational noise impacts associated with operation of the proposed project or permanent increases in ambient noise would be less than significant.

The Project is thus evaluated for consistency with the noise requirements pursuant to Appendix G of the State CEQA guidelines and requirements articulated in the Noise Element of the City of Los Angeles (City) General Plan,<sup>11</sup> the City's Noise Regulation outlined in Chapter XI of the Los Angeles Municipal Code (LAMC),<sup>12</sup> the City's CEQA Threshold Guide,<sup>13</sup> and the Federal Transit Authority's (FTA)

<sup>8</sup> Occupational Safety and Health Administration. *OSHA Technical Manual, Section III: Chapter 5, Noise*.

Available at: [https://www.osha.gov/dts/osta/otm/new\\_noise/#table2.4](https://www.osha.gov/dts/osta/otm/new_noise/#table2.4)

<sup>9</sup> Average ambient noise level at proposed project site (68.3 dBA) + Mechanical Threshold Allowance (5 dBA) = 73.3 dBA.

<sup>10</sup> Average ambient noise level at proposed project site (68.3 dBA) + Parking Threshold Allowance (10 dBA) = 78.3 dBA.

<sup>11</sup> Los Angeles City General Plan. February 1999. *Noise Element*. Prepared by: Department of City Planning. Los Angeles, CA.

<sup>12</sup> *City of Los Angeles Municipal Code*, Chapter XI, *Noise Regulation*.

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guidelines for assessing vibration impacts.<sup>14</sup> The Project consists of four industrial buildings that would be built in compliance with the Los Angeles Green Building Code. As a result, the Project is found to be consistent with all plans, policies, and regulations related to noise.

Should there be any questions regarding the information contained in this letter, please contact Mr. Eric Charlton at (626) 683-3547 or [echarlton@sapphosenvironmental.com](mailto:echarlton@sapphosenvironmental.com).

Sincerely,

**SAPPHOS ENVIRONMENTAL, INC.**

A handwritten signature in black ink, appearing to read 'E. Charlton', with a long horizontal flourish extending to the right.

Eric Charlton

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<sup>13</sup> City of Los Angeles. 2006. *L.A. CEQA Thresholds Guide*. Prepared by: Environmental Affairs Commission and the Environmental Affairs Department. Los Angeles, CA.

<sup>14</sup> Federal Transit Administration. May 2006. *Transit Noise and Vibration Impact Assessment*. Washington, DC.