CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NEGATIVE DECLARATION
(Article I, City CEQA Guidelines)

LEAD CITY AGENCY AND ADDRESS:	Los Angeles City Engineer Bureau of Engineering, EMG 1149 Broadway, Suite 600 Los Angeles, CA 90015-2213	**COUNCIL DISTRICT** **14**
PROJECT TITLE: Mariondale Avenue and Lillyvale Avenue Vacation District Project (W.O. E1401293)		**T.G.** Page 595, Grid G-7

PROJECT LOCATION: The project site is located northerly of Valley Boulevard, easterly of Mariondale Avenue, and southerly of the Union Pacific Railroad tracks, in the Community of University Heights. It is in the South Region, of the LA-32 Neighborhood Council, of the Northeast Los Angeles Community, of the 14th Council District.

DESCRIPTION: The purpose of the request is to vacate a portion of Mariondale Avenue, between Lillyvale Avenue and approximately 200-feet west of Lillyvale Avenue and all of Lillyvale Avenue, locate a corporate entrance to the Upper Campus near the intersection of vacated Mariondale and Lillyvale Avenues for increased security, construct a Guard Station at the main entrance to the Upper Campus, and erect security fencing around the Guard Station area, so as to create an efficiency of goods movement within the Upper Campus area.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:

FINDING: The **City Engineer** of the City of Los Angeles has determined the proposed project could not have a significant effect on the environment. See attached Initial Study.

SEE THE ATTACHED PAGES FOR ANY MITIGATION MEASURES IMPOSED

Any written objections received during the public review period are attached, together with the responses of the lead City agency.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

PERSON PREPARING THIS FORM: James R Tebbetts	**ADDRESS:** 1149 S. Broadway, Suite 600, MS 939 Los Angeles, CA 90015	**TELEPHONE NUMBER:** (213) 485-5732
SIGNATURE (Official): Maria Martin, Environmental Affairs Officer Environmental Management Group		**DATE:** July 24, 2017

CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY

(Article I - City CEQA Guidelines)

Council District: 14th

Date: July 24, 2017 (Draft)
February 22, 2018 (Final)

Lead City Agency: City of Los Angeles, Department of Public Works, Bureau of Engineering – Central District, Land Use Development

Project Title: Mariondale Avenue and Lillyvale Avenue Vacation District (W.O. E1401293)

I. INTRODUCTION

A. Purpose of an Initial Study

The *California Environmental Quality Act* (CEQA) was enacted in 1970 for the purpose of providing decision-makers and the public with information regarding environmental effects of proposed projects; identifying means of avoiding environmental damage; and disclosing to the public the reasons behind a project's approval even if it leads to environmental damage. The Bureau of Engineering, Environmental Management Group (BOE/EMG) has determined the proposed project is subject to CEQA and no exemptions apply. Therefore, the preparation of an initial study is required.

An initial study is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the initial study concludes that the project, with mitigation, may have a significant effect on the environment, an environmental impact report should be prepared; otherwise the lead agency may adopt a negative declaration or mitigated negative declaration.

This Initial Study (IS) has been prepared in accordance with CEQA (*Public Resources Code* §21000 et seq.), the State CEQA Guidelines (Title 14, *California Code of Regulations*, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended July 31, 2002).

B. Document Format

This Initial Study is organized into nine sections as follows:

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

Section II, Project Description: provides a description of the project location, project background, and project components.

Section III, Existing Environment: provides a description of the existing environmental setting with focus on features of the environment which could potentially affect the proposed project or be affected by the proposed project.

Section IV, Environmental Effects/Initial Study Checklist: provides a detailed discussion of the environmental factors that would be potentially affected by this project as indicated by the screening checklist in Appendix A.

Section V, Mitigation Measures: provides the mitigation measures that would be implemented to ensure that potential adverse impacts of the proposed project would be reduced to a less than significant level.

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

Section VII, Determination – Recommended Environmental Documentation: provides the recommended environmental documentation for the proposed project; and,

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

Section IX, Clarifications and Modifications: provides any updates to the Draft IS/ND in response to the comments received during the public review period

C. CEQA Process

Once the adoption of a negative declaration (or mitigated negative declaration) has been proposed, a public comment period opens for no less than twenty (20) days or thirty (30) days if there is state agency involvement. For purposes of this project there is no state agency involvement. The purpose of this comment period is to provide public agencies and the general public an opportunity to review the initial study and comment on the adequacy of the analysis and the findings of the lead agency regarding potential environmental impacts of the proposed project. If a reviewer believes the project may have a significant effect on the environment, the reviewer should (1) identify the specific effect, (2) explain why it is believed the effect would occur, and (3) explain why it is believed the effect would be significant. Facts or expert opinion supported by facts should be provided as the basis of such comments.

After the close of the public review period, the City Council considers the negative declaration or mitigated negative declaration, together with any comments received during

the public review process. One or more Council committees may then review the proposal and documents and make its own recommendation to the full City Council. The City Council is the decision-making body and also considers the negative declaration or mitigated negative declaration, together with any comments received during the public review process, in the final decision to approve or disapprove the project.

During the project approval process, persons and/or agencies may address either the City Council regarding the project. Public notification of agenda items for the Council committees and City Council is posted 72 hours prior to the public meeting. The Council agenda can be obtained by visiting the Council and Public Services Division of the Office of the City Clerk at City Hall, 200 North Spring Street, Suite 395; by calling 213/978-1047, 213/978-1048 or TDD/TTY 213/978-1055; or via the internet at http://www.lacity.org/CLK/index.htm.

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

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

II. PROJECT DESCRIPTION

A. Location

The project site is located northerly of Valley Boulevard, easterly of Mariondale Avenue, and southerly of the Union Pacific Railroad tracks, in the Community of University Heights. It is in the South Region of the LA-32 Neighborhood Council of the Northeast Los Angeles Community of the 14th Council District. (See Figures 1, 2, and 3)

B. Purpose

The purpose of the request is to vacate a portion of Mariondale Avenue, between Lillyvale Avenue and approximately 200-feet west of Lillyvale Avenue and all of Lillyvale Avenue, locate a corporate entrance to the Upper Campus near the intersection of vacated Mariondale and Lillyvale Avenues for increased security, construct a Guard Station at the main entrance to the Upper Campus, and erect security fencing around the Guard Station area, so as to create an efficiency of goods movement within the Upper Campus area.

FIGURE 1 – REGIONAL MAP

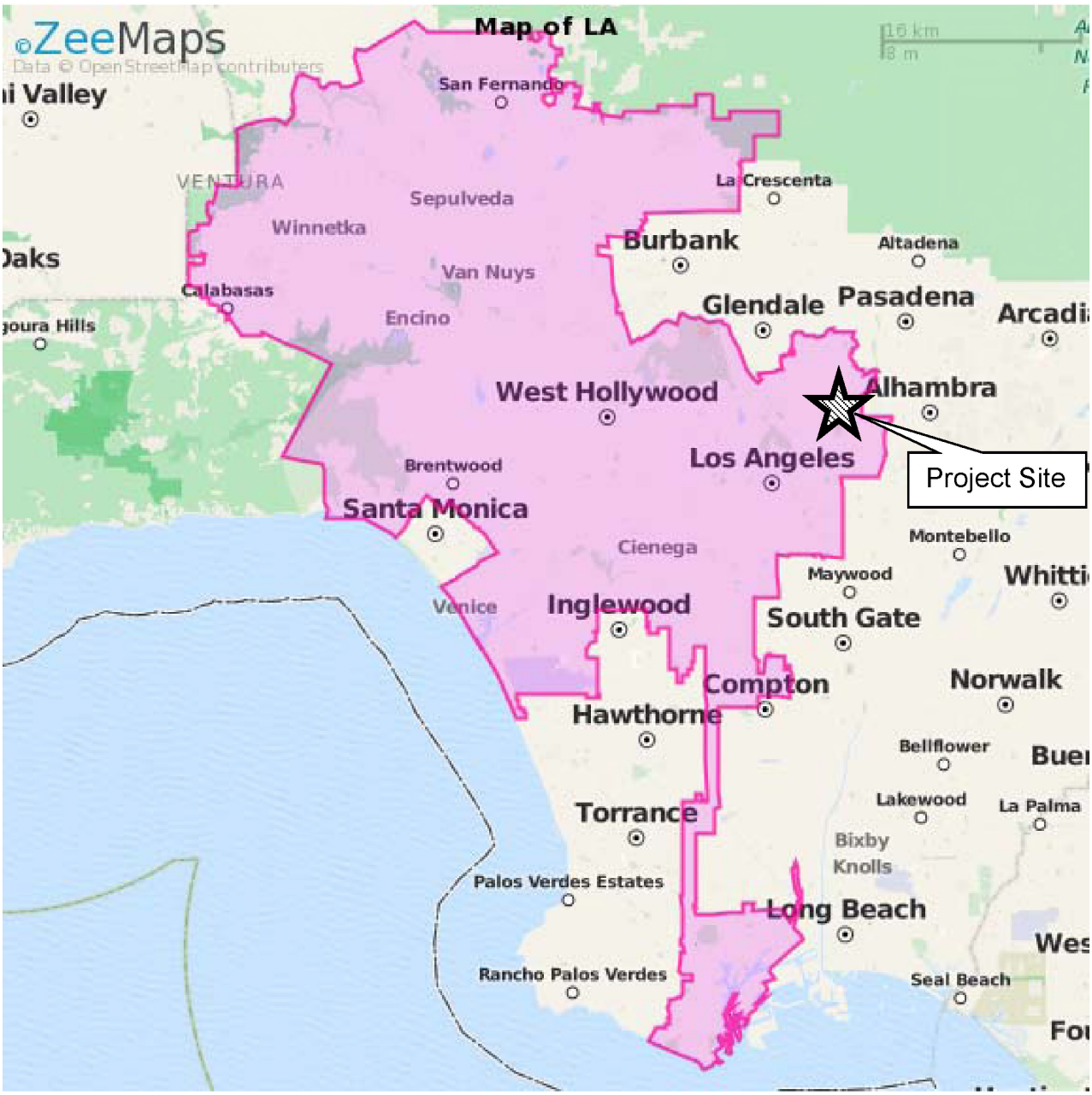
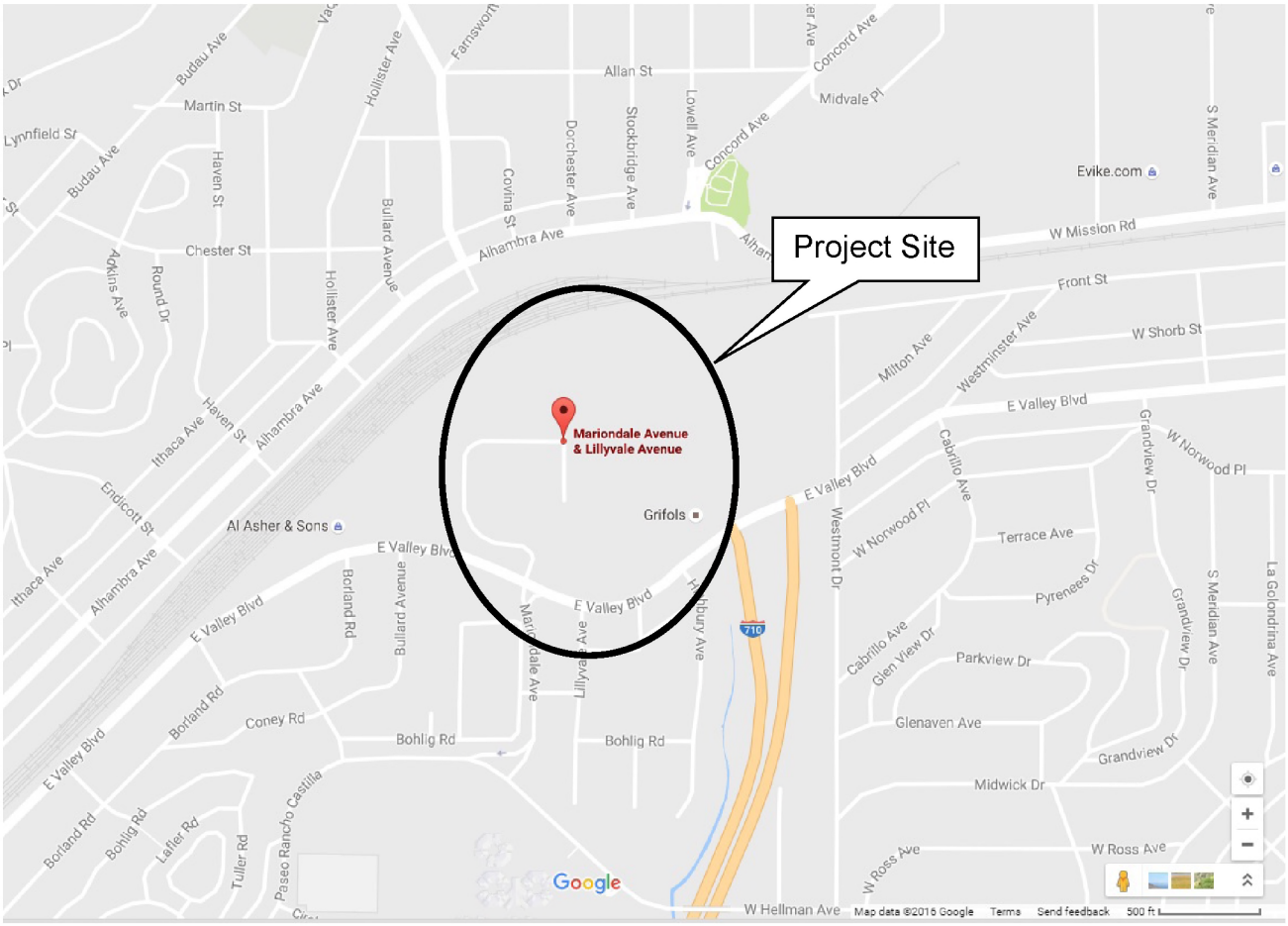


FIGURE 2 – VICINITY MAP



C. Description

Project Activities Include:

Vacation:

Vacation of a portion of Mariondale Avenue, between Lillyvale Avenue and approximately 200-feet west of Lillyvale Avenue and all of Lillyvale Avenue. The vacated area is approximately 43,894 square feet (1.0 acre) in area. Figure 4 shows the area to be vacated.

Development Within Project Area: Construction of a Guard Station at the main entry point to the Upper Campus, at the end of the vacated Mariondale Avenue. The Guard Station has an area of ninety-square feet (7'6" wide and 12' long) with a sloping roof. The roof will have a height of between 9'3" (front of building) to 8'5" (rear of building). Access doors will be provided on the northerly and southerly side of the Guard Station, with a window on the westerly facing side. Utilities will be provided to the Guard Station, to include, but not limited to electrical and communication (i.e., telephone, internet, security, etc.) services. The

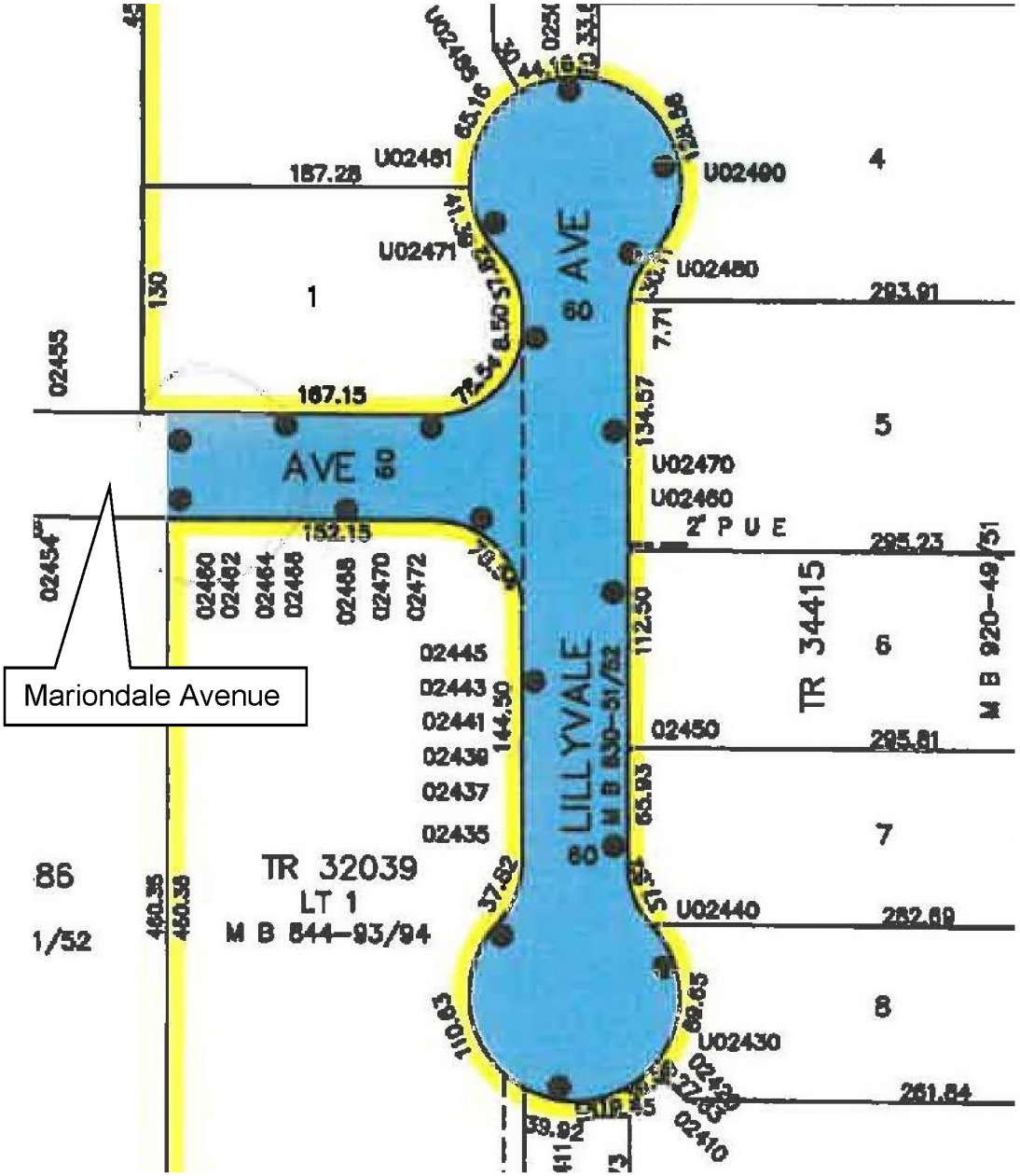
utilities will be placed underground. Exterior security lighting will also be provided. Two gates will be installed, one for entry into and one for exit from the Upper Campus. The entry gate will have a width of twenty-one feet (21'0") and the exit gate will have a width of fifteen feet (15'0"). These gates will be controlled by staff within the Guard Station. New security fencing will be installed to secure the area around the new Upper Campus entrance, and will be vertical steel, with a height of 6'0". The location of the improvements can be found on Figure 5.

FIGURE 3 – PROJECT AREA AND SURROUNDING DEVELOPMENT

As part of the vacation process the following recommendations will be accomplished, per requirements of both Public and Private Agencies whose infrastructure is found within or near the project site.

Dedications: Mariondale Avenue north of Valley Boulevard – Mariondale Avenue north of Valley Boulevard is identified on the *Northeast Los Angeles Community Plan* as a local street, with a right-of-way of 60-feet. The existing right-of-way varies from 60-feet at Valley Boulevard to 52-feet at Lillyvale Avenue. Dedication of sufficient right-of-way to create a half width street of 30-feet (0' to 4').

FIGURE 4 – AREA OF VACATION (AREA IN BLUE)



Road Improvements: On Mariondale Avenue north of Valley Boulevard construct a full 8-foot wide sidewalk in the area where the sidewalk width has been bottlenecked due to reduced dedication. On Mariondale Avenue at its Northerly Terminus construct a turn area per *Standard Plan S-470-1*, Sheet 3 of 4, as shown on sketch labeled "*Minimum Turning Area (Plan View)*" will be required. (Figure 6 in Traffic Section). On Valley Boulevard repair damaged curb, gutter or sidewalk. Close unused driveways. This may result in the removal of existing street trees. Per Board of Public Works Policy, any street trees removed would be replaced on a ratio of two trees planted for each street tree removed.

Street Light Improvements: Install a one (1) new street light on Mariondale Avenue (On the east side of Mariondale Avenue, approximately 175-feet north of the centerline of Valley Boulevard. Actual location will be coordinated with Bureau of Street Lighting (BSL)). As part of any street widening relocate/upgrade seven (7) street lights on Valley Boulevard and one (1) street light on Mariondale Avenue. As part of the vacation, BSL is recommending *removal* ~~remove~~ *of* one (1) street light on Mariondale Avenue and *four (4)* ~~three (3)~~ street lights on Lillyvale Avenue. *The applicant is currently working with BSL for the transfer of these street lights to their ownership.*

Granting of Easements: Easements will be granted to existing utility providers located at or near the project site (to include, but not limited to: Los Angeles Department of Water and Power, Southern California Gas Company, ATT, Spectrum Cable, and City of Los Angeles Department of Public Works, Bureaus of Street Lighting, Sanitation, and Engineering).

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

- *Los Angeles Municipal Code (LAMC)*
- Bureau of Engineering *Standard Plans*
- *Standard Specifications for Public Works Construction*
- *Work Area Traffic Control Handbook*
- *Additions and Amendments to the Standard Specifications for Public Works Construction*

III. EXISTING ENVIRONMENT

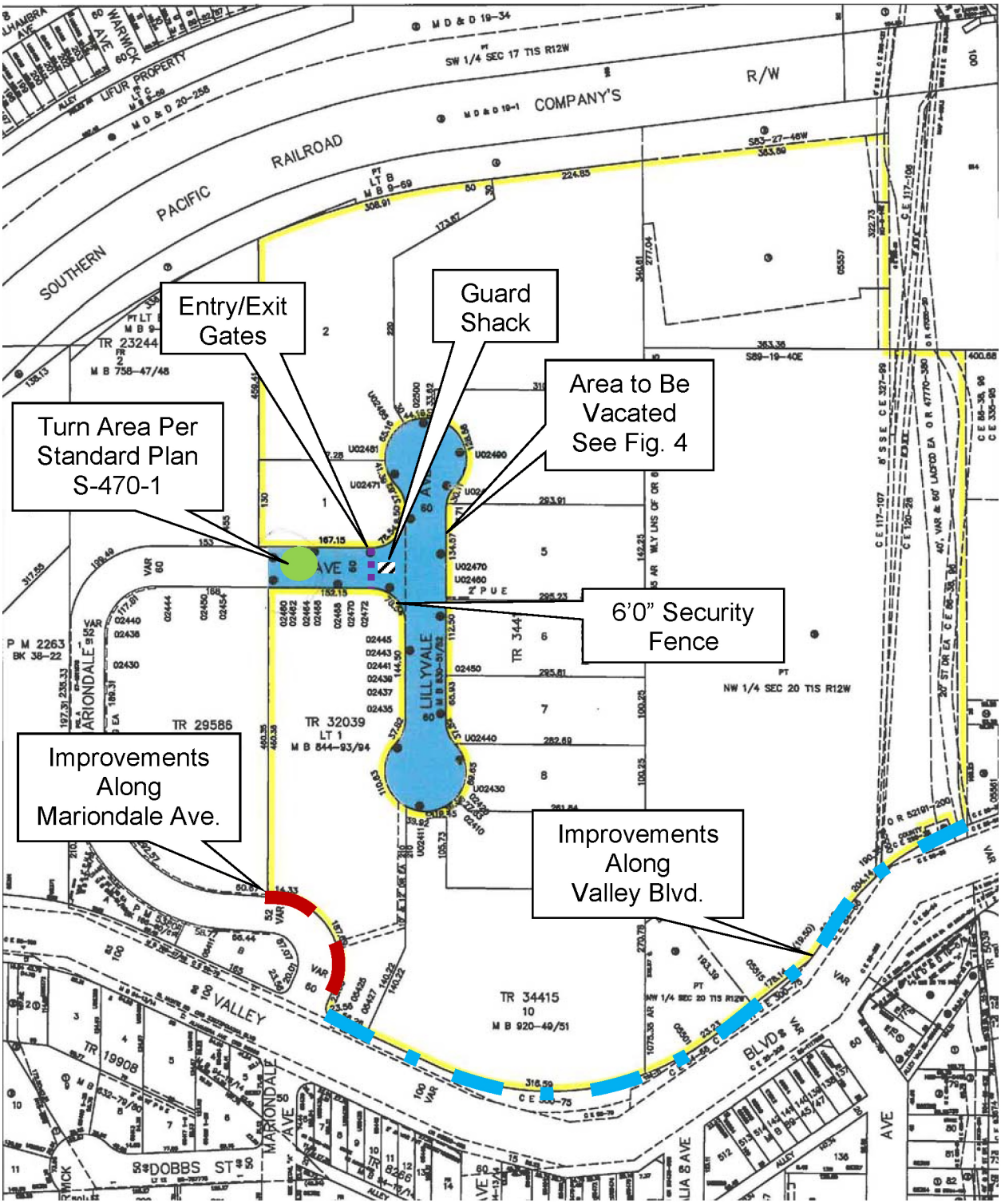
Access to the project is from Valley Boulevard, via Mariondale Avenue to Lillyvale Avenues. Valley Boulevard can be used to travel to areas east and west of the project site. Lillyvale Avenue, provides access to the individual buildings at the project site. To the southeast is the Long Beach Freeway (I-710). This freeway ends at Valley Boulevard and can be used to travel to areas south of the project site. Further south, approximately one-mile south of Valley Boulevard where it meets the I-710 is the San Bernardino Freeway (I-10); this freeway can be accessed from the Long Beach Freeway. There is no direct access to the project site, from the north, due to the presence of active rail lines and the project is approximately 60 feet in height above the rail lines.

The portion of the project that includes Mariondale and Lillyvale Avenues sits on a plateau located about sixty-feet above Valley Boulevard. Mariondale Avenue has an overall slope of approximately 4.1 percent, from its intersection with Valley Boulevard to its intersection with Lillyvale Avenue.

Adjoining the streets to be vacated (Mariondale Avenue and Lillyvale Avenue) are eleven parcels. Ten of these parcels contain existing industrial buildings, off-street parking, and landscaping. One parcel is used exclusively as an off-street parking lot. To the east of these eleven parcels are four additional parcels owned by the applicant. Uses on these

fifteen properties include offices, sales, manufacturing, and warehousing operations.

FIGURE 5 – GENERAL LOCATION OF PROPOSED AND RECOMMENDED IMPROVEMENTS



Currently approved for development and under construction on various parcels are: New Cooling Towner Chiller for Building 300; New Tank Pad, near Building 300; a New CO2 Tank for Waste Water Neutralization near building 300; New Chiller Pad, near Building 301; and Interior Renovations for Building 408. As these projects were previously evaluated and approved by another City Agency, they are not evaluated within this document. The construction of these buildings is not dependent on the approval of the vacation.

Table 1 summarizes the zoning designations, general plan and land uses for the properties within the roadway and adjoining property, and properties to the north, east (both Cities of Los Angeles and Alhambra), south, and west of the streets to be vacated.

TABLE 1 - EXISTING ZONING, GENERAL PLAN DESIGNATION, AND LAND USE

LOCATION	ZONING	GENERAL PLAN	LAND USE
Roadway	None	None	Local Road
Adjoining Property	PF-1 (Public Facilities) and MR-1 (Restricted Industrial)	Open Space and Light Manufacturing	Offices, manufacturing, warehousing and parking lot
North	PF-1 and MR-1	Open Space and Light Manufacturing	Union Pacific Railroad, commercial, and industrial uses
East (City of Los Angeles)	PF-1	Public Facilities	Industrial uses and open space
East (City of Alhambra)	R-1 (Single Family), IPD (Industrial Planned Development, and P (Parking)	Low Density Residential (0-5 Du/Ac), Industrial, and Parking	Residential, commercial, and industrial
South (1)	PF-1, C2-IVL (General Commercial), and RD1.5.-1 (Restricted Density Multiple Dwelling)	Open Space; General Commercial; and Low/Medium II Residential	Commercial and Residential.
West	PF-1 and MR-1	Open Space and Light Manufacturing	Industrial uses

Source: *Northeast Los Angeles Community Plan;* NavigateLA; and ZIMAS.
Notes:
1. Further to south is California State University, Los Angeles (CSULA).

IV. POTENTIAL ENVIRONMENTAL EFFECTS

The environmental factors checked below would be potentially affected by this project, involving at least one impact as indicated by the checklist in Appendix A. A detailed discussion of these potential environmental effects follows.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology /Soils
☐ Greenhouse Gas Emissions	☐ Hazards & 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

A. Aesthetics

The project calls for the vacation of two streets within an existing industrial complex. Minor improvements to existing roadways (i.e., new Minimum Turning Area, sidewalk widening and improvements, etc.), construction of a Guard Station, and installation of a security fence around the Guard Station will be accomplished. There are no State or City designated scenic streets or scenic vistas on or adjacent to the project site. There are no identified scenic vistas at or from the project site.

Conditions of approval for the project call for the installation of a single street light on Mariondale Avenue and the relocation/upgrade of seven street lights on Valley Boulevard and one street light on Mariondale Avenue. These new street lights will be designed in accordance with the City of Los Angeles Department of Public Works, Bureau of Street Lighting's *Design Standards and Guidelines* (May, 2007). Installation of these street lights in accordance with these Standards and Guidelines.

The street lights will be installed in areas that are primarily commercial and industrial in nature and would not affect sensitive resources (i.e., residential areas). The nearest residential area is approximately two hundred and fifty feet (250') away across Valley Boulevard, behind commercial uses that line the south side of Valley Boulevard.

Initial screening determined that the proposed project would cause no impact. (See Appendix A)

B. Agriculture and Forestry Resources

The project site is in an urban area and is fully developed with buildings, off-street parking, streets, curb, gutter, and sidewalks. In reference to the California Department of Conservation Division of Land Resource Protection, Farmland Mapping and Monitoring Program, *Important Farmland in California, 2006 Map*, the project site is identified as Urban and Built-Up Land. As such the project site is not an Agricultural or Forestry Resource.

Initial screening determined that the proposed project would cause no impact. (See Appendix A)

C. Air Quality

Construction and operation emissions have been estimated using the CALEEMOD (Version 2013.2.2) computer model as recommended by the South Coast Air Quality Management District (SCAQMD) (Reference 31). As shown below in Table 2, daily construction emissions would not exceed SCAQMD significance thresholds.

TABLE 2 -AIR QUALITY IMPACTS (1, 2)

CONSTRUCTION IN 2018	ROG	NO_X	CO	SO_2	TOTAL	
					PM_{10}	$PM_{2.5}$
TONS/YEAR	0.116	0.992	0.818	0.0014	0.060	0.054
POUNDS/YEAR	231.6	1,984.4	1,635.4	2.9	120.6	107.8
POUNDS/DAY	0.635	5.437	4.481	0.0078	0.330	0.295
SCAQMD THRESHOLD (POUNDS/DAY)	**75**	**100**	**550**	**150**	**150**	**55**
EXCEED SCAQMD DAILY STANDARD	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
PERCENT OF DAILY ALLOWABLE	0.85%	5.44%	0.81%	0.01%	0.22%	0.54%

Sources:
CALEMOD spreadsheet: Q:\James\Vacation Mariondale and Lillyvale\CEQA\Annual Air Quality CALEEMOD.xls
SCAQMD Threshold Source:
http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significar thresholds.pdf?sfvrsn=2
Notes:
1. Assumes compliance with SCAMD and City Construction related rules, regulations and practices, so as to reduce air quality impacts.
2. Construction only. No operational activities counted, data too small.

There should be no change in the activities currently found on the project site. Minor

improvements to roadways, construction of an enclosed Guard Station, and installation of a security fence will be accomplished around the Guard Station are proposed. There are no other construction activities that are proposed that are dependent on the vacation of these roadways.

A minimal increase in operational emissions are anticipated as a result of operations at the Upper Campus. An increase from the Guard Station is expected, but is expected to be very minimal. With the new entry point there may be a slight delay for employees and delivery vehicles entering and exiting the Upper Campus due to security checks. This increase in emissions from worker vehicles and transportation vehicles exhaust can be considered negligible and should not exceed SCAQMD daily operational emission thresholds and as such there would be no significant impact on air quality.

Although construction emissions are anticipated to be well below SCAQMD thresholds, contractors would be required to follow all applicable SCAQMD rules and regulations, including, but not limited to AQMD Rule 403 (*Fugitive Dust*) and 431 (*Diesel Equipment*), to minimize air quality impacts. As an example, the Contractor would water dusty areas and minimize the tracking of soil from unpaved dirt areas to paved roads.

Initial screening determined that the proposed project would have a less than significant impact. (See Appendix A)

D. Biological Resources

The California Department of Fish and Game (CDFG), *California Natural Diversity Database* lists occurrences of species, which are federally and/or state listed as endangered or threatened within the Los Angeles topographic quadrangle. Table 3 shows those species that are considered Endangered or Threatened under Federal and State Law or a species of special concern, as identified by the California Department of Fish and Wildlife and may be found within the Los Angeles topographical quadrangle.

TABLE 3 - ENDANGERED/THREATENED SPECIES

NAME		STATUS		
SCIENTIFIC	**COMMON**	**FEDERAL**	**STATE**	**STATE (1)**
Athene cunicularia	burrowing owl			SSC
Empidonax traillii extimus	southwestern willow flycatcher	Endangered	Endangered	
Eumops perotis californicus	western mastiff bat			SSC
Nyctinomops macrotis	big free-tailed bat			SSC
Phrynosoma blainvillii	coast horned lizard			SSC
Piranga rubra	summer tanager			SSC
Polioptila californica	coastal California	Threatened	None	

TABLE 3 - ENDANGERED/THREATENED SPECIES				
NAME		STATUS		
SCIENTIFIC	COMMON	FEDERAL	STATE	STATE (1)
	gnatcatcher			
Polioptila californica	coastal California gnatcatcher			SSC
Rana draytonii	California red-legged frog	Threatened	None	
Rana draytonii	California red-legged frog			SSC
Setophaga petechia	yellow warbler			SSC
Spea hammondii	western spadefoot			SSC
Taxidea taxus	American badger			SSC
Vireo bellii pusillus	least Bell's vireo	Endangered	Endangered	

Source: *California Natural Diversity Database, Los Angeles Quadrangle*
https://map.dfg.ca.gov/bios/?tool=cnddbQuick Accessed August 23, 2016.
Note
1. SSC – Species of Special Concern (CDFW)

The project site is located in an urbanized area and is fully developed with buildings, streets, curb, gutter, sidewalks, off-street parking areas, and some landscaping. Habitat necessary for these species is not found on this or on adjoining properties. Figure 3 is an aerial photo of the project site.

Initial screening determined that the proposed project would cause no impact. (See Appendix A)

E. Cultural Resources

A review of maps within the BOE/EMG offices has shown that at one time the project site and surrounding areas where in a mapped area noting that this is an area in which archaeological resources might be found. Research through the City Planning Department indicates that the underlying Tract Maps were approved around the time of the implementation of CEQA. Records have not been found, which confirms if CEQA was complied with or not. The Maps may have been approved prior to CEQA. The maps were recorded in the 1973/74 timeframe.

Based on square footage and uses in the buildings on these properties, they may have been permitted uses, in which case CEQA may not have been required. If there were archaeological resources here, most likely there are not there now, due to grading of the property and construction of the buildings, off-street parking lots, roadways, and landscaping.

The project site contains several buildings that are used for manufacturing and wholesale

activities. These buildings were constructed over time, starting in 1947 and continuing through 1974, 1981, 1982, 1990, 1995, 1998, 2006, 2007, and 2010. There have been many upgrades, remodeling and improvements to these buildings since their initial construction. Upgrades, remodeling and improves continue. As previously identified, there are five (5) currently approved and permitted projects underway. As these projects were previously approved, they are not evaluated within this document. No other projects are being proposed that are dependent on the vacation, other than the road improvements, proposed security fencing, entry gate, and Guard Station building.

A review of the City Planning Department's Zone Information and Map Access System (ZIMAS) and Navigate LA computer programs for the subject property indicates: that none of the buildings require any type of historic preservation review; and none of the properties are designated as a Historic Cultural Monument as found on the City Planning Department's Office of Historic Resources.

A Cultural Resources Records Search Request was made to the South Central Coastal Information Center (SCCIC). The resulting report (Appendix B) found that the project area has not been surveyed by a professional archaeologist; the archaeological sensitivity of the project site is unknown; and the current surface conditions do not appear to allow for an adequate survey of potential surface or sub-surface cultural artifacts. Based on this, the SCCIC recommended that:

> "No archaeological work is needed prior to approval of the project plans. However, customary caution and a halt-work condition should be in place for all ground disturbing activities. In the event that cultural resources are encountered, all work within the vicinity of the find should stop until a professional archaeologist can be retained to assess such finds and make recommendations."

The SCCIC recommend also that if cultural resources are discovered, excavation should not be attempted by construction personnel.

Based on the SCCIC's recommendation, the project shall comply with the City of Los Angeles, *City Engineer Standard Specifications*, Section 6-3.2, which states:

> "If discovery is made of items of archaeological or paleontological interest, the Contractor shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Engineer."

The discovery of human remains is always a possibility during ground disturbances; State of California *Health and Safety Code* Section 7050.5 states that no further disturbance shall occur until the Los Angeles County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The Los Angeles County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and

items associated with Native American burials

Therefore, during activities in which there will be ground disturbances (i.e., digging, drilling, etc.) if any evidence of archaeological, cultural, or paleontological resources are found, all work within the vicinity of the find shall stop until a qualified archaeologist can assess the finds and make recommendations. No excavation of any finds should be attempted by project personnel unless directed by a qualified archaeological consultant. Work in other areas may continue.

Initial screening determined that the proposed project would cause a less than significant impact. (See Appendix A)

F. Geology and Soils

The *Zone Information and Map Access System* (ZIMAS) has identified the project site as a Hillside Area on the Department of City Planning Hillside Area Map. The Baseline Hillside Ordinance applies to all properties which are zoned R-1, RS, RE, and RA and are designated as a Hillside Area, as defined in Section 12.03 of the LAMC. The roads to be vacated do not have a zoning designation. The surrounding properties have designations of PF-1 and MR-1. As such the Baseline Hillside Ordinance, does not apply to this project.

The project site is also noted as being within the Special Grading Area (as shown on the Bureau of Engineering (BOE) Basic Grid Map A-13372) on the ZIMAS web site. In order to negate the environmental impacts of grading in designated Hillside Areas maximum effort shall be made to balance cut and fill on-site. Complying with city grading standards should meet this requirement.

Minimal grading and excavation activities are proposed, these primarily related to the construction of the Minimum Turning Area and widening of the sidewalk. Minor grading for construction for the widening of the sidewalk along Mariondale Avenue and of the Minimum Turning Area at the new terminus of Mariondale Avenue will be accomplished. An estimated sixty-seven cubic yards of soil will be removed at the sidewalk and 410.3 cubic yards for the Minimum Turning Area. Depending on the capacity of trucks used, between 35 and 49 trucks will be used to haul the soil away. Table 4 provides a summary of expected amount of soil to be excavated and trucks needed to remove the excavated soil.

TABLE 4 – SUMMARY OF GRADING ACTIVITY

ACTIVITY	AREA (SQ. FT.)	CUBIC FEET	CUBIC YARDS	TRUCKS (2)
Mariondale Avenue Improvements (3)	900	1,800 (1)	67	5-7
Valley Boulevard Improvements	10,075	5,037 (4)	187	14-19
Minimum Turning Area Construction	5,540	11,080 (1)	411	30-42

TABLE 4 – SUMMARY OF GRADING ACTIVITY				
Total	16,515	17,917	665	49-68
Notes: 1. Assume 2-feet of depth 2. Trucks used, depends on the capacity of the truck (14 or 10 cubic yards). Values rounded up. 3. Sidewalk would be cut into a hillside. 4. Assume 0.5-feet of depth				

Soil types found on the property are Altamont Clay Loam. The Altamont series consists of deep, well drained soils that formed in material weathered from fine-grained sandstone and shale. These soils are on gently sloping to very steep uplands. The average annual precipitation is about 17 inches and the mean annual temperature is about 59 degrees F.

The nearest fault (Upper Elysian Park) is approximately 0.68 kilometers (0.42 miles) away. The site is not located in an Alquist-Priolo Fault Zone or is it located in an area impacted by landslides or liquefaction. The site is not in a Preliminary Fault Rupture Study Area. The construction of the Guard Station will be accomplished to meet the City of Los Angeles Building Codes.

The majoring of the project site is not located in an area identified as being susceptible to landslides. There is a small area located on property at 5515 and 5555 E Valley Boulevard that is mapped as being in a landslide area. However, no development activities are planned for this area.

The project site is not in mapped liquefaction zone. Nearest liquefaction zone is approximately 500-feet west of the project site, near Bullard Avenue and Valley Boulevard.

Initial screening determined that the proposed project would cause less than significant impact. (See Appendix A)

G. Greenhouse Gas Emissions

SCAQMD has recommended a greenhouse gas significance threshold of 10,000 metric tons per year of carbon dioxide equivalent (CO_2e) for assessing the significance of potential GHG emissions. SCAQMD allows GHG emissions from construction to be amortized over 30 years. Table 5 shows the amount of GHG that might be emitted by the construction aspects of this project.

TABLE 5 - GREEN HOUSE GAS IMPACTS (1)					
BIO- CO_2	NBIO- CO_2	TOTAL CO_2	CH_4	N_2O	CO_2e
0.00	117.88	117.88	0.026	0.0000	117.91
SCAQMD Threshold (Metric Tons (CO2 Equivalent)/Year)					10,000

TABLE 5 - GREEN HOUSE GAS IMPACTS (1)	
Exceeds SCAQMD Threshold	**NO**
Percent	1.18%
Sources: Data from CALEMOD spreadsheet: Q:\James\Vacation Mariondale and Lillyvale\CEQA\Annual Air Quality CALEEMOD.xls SCAQMD Threshold Source – Table 1: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2 Notes 1. Construction only. No operational activities calculated, data too small.	

The calculated CO_2e for this project is far below the SCAQMD recommended threshold, and therefore not expected to have a significant impact.

A minimal increase in operational greenhouse gas emissions are anticipated as a result of operations at the Upper Campus. An increase from the Guard Station is expected, but it is expected to be very minimal. With the new entry point there may be a slight delay for employees and delivery vehicles entering and exiting the Upper Campus due to security checks. This increase in emissions from worker vehicles and transportation vehicles exhaust can be considered negligible and should not exceed SCAQMD daily operational emission thresholds and as such there would be no significant impact on air quality.

Initial screening determined that the proposed project would cause less than significant impact. (See Appendix A)

H. Hazards and Hazardous Materials

The State Department of Toxic Substances Control's (DTSC) Envirostor database (www.envirostor.dtsc.ca.gov) allows people to quickly access vital information about environmental cleanups and permitted facilities in their communities. Envirostor provides information on permits and corrective action at hazardous waste facilities, as well as site cleanup projects. Envirostor also provides information on facility inspection and enforcement actions, in addition to site investigation, site cleanup, permitting, and planned, current or completed corrective actions under DTSC oversight. A review of the DTSC web site showed that no sites were identified as being located on or adjacent the streets to be vacated or the properties adjacent to these streets or where construction activities will occur. The nearest identified site is approximately one-half mile to the northwest (American Environmental LLC, 3033 W. Mission Road Alhambra, CA 91803).

The California State Water Quality Control Board's (SWQCB) Geotracker database (http://geotracker.waterboards.ca.gov) allows people to quickly access vital information about Leaking Underground Fuel Tank (LUFT) cleanup sites and of Spills, Leaks, Investigation, and Cleanups (SLIC) sites. A LUFT site is an undergoing cleanup due to an unauthorized release from an underground storage tank system (UST) system. An UST is a

tank and any underground piping connected to the tank that has at least 10 percent of its combined volume underground. UST regulations apply only to underground tanks and piping storing either petroleum or other identified hazardous substances. A Leaking Underground Storage Tank (LUST) site can be an area contaminated not just from a LUST, but also from spills and overfills that occurred when USTs were in use. The SLIC program investigates and regulates non-permitted discharges.

A review of the SWQCB web sites show there are three sites being located on or adjacent the streets to be vacated or the properties adjacent to these streets or where construction activities will occur. A closed LUST site is located in the eastern portion of the project site. There are two (2) closed LUST sites nearest the construction site at Mariondale Avenue and Valley Boulevard. Construction activities near the intersection of Mariondale and Lillyvale Avenues are between forty- to eighty- feet (40-80') higher in elevation than these closed sites. Table 6 provides a listing of these adjoining closed sites, along with the distance between the closed site and the nearest area in which work will occur, along Valley Boulevard. As such the area in which construction activities will occur should not be impacted by these closed LUST sites.

TABLE 6 - NEAREST LUST SITES

LOCATION, ADDRESS, AND DATE CLOSED	SITE NUMBER	CASE NUMBER	LOCATION (1)
Alpha Therapeutic Corp. 5555 Valley Boulevard Case Closed 12/12/2006	T0603700820	900320070A	Property adjacent to north side of Valley Boulevard
Chevron Station 5450 Valley Boulevard Case Closed 1/29/2008	T0603769985	900320170	113-feet south of project, across Valley Boulevard
Sun Lighting 5359 Valley Boulevard Case Closed 12/3/2002	T0603700836	900320134	Property adjacent to north side of Valley Boulevard

Source: http://geotracker.waterboards.ca.gov/, accessed December 8, 2016
Notes:
1. From nearest location where construction activities will occur. This would include curb cuts/replacement, gutter and sidewalk repairs, closure of unused driveways, and street tree replacement along the north side of Valley Boulevard. As the sites are cleaned up and file closed and with the shadow depth of work, no impact is expected.

Initial screening determined that the proposed project would cause no impact. (see Appendix A)

I. Hydrology and Water Quality

The project site and adjoining properties at located in Zone C (FIRM Map 060137 0067 C) of the Federal Insurance Rate Maps (FIRM). Zone C is an area determined to be outside 500-year floodplain and is determined to be outside the 1% (1 in 100 years) and 0.2% (1 in

500 years) annual chance of flooding.

Initial screening determined that the proposed project would cause no impact. (see Appendix A)

J. Land Use and Planning

City Zoning and Community Plan Land Use Designations – City Streets do not have zoning or land use designations. The adjoining properties have zoning designations are 'PF' (Public Facilities Zone) and "MR-1" (Restricted Industrial Zone). The corresponding land use designations found in the *Northeast Los Angeles Community Plan* identifies the area as Open Space/Public Facilities and Industrial, Limited Manufacturing uses.

City General Plan – Policies - The project site is within the *Northeast Los Angeles Community Plan* area. As part of the Vacation Request, the City Planning Department has determined that this vacation is consistent with the *Northeast Los Angeles Community Plan* policies and objectives, as set forth below, because it would facilitate the ongoing use of the industrial site and would provide better circulation on site. Furthermore, these street segments are Minimum Turning Area s within the industrial campus and the vacation of these segments would not negatively affect the larger circulation network. As part of the vacation process, the City Planning Department was contacted. The Planning Department noted that the vacation would be inconformity with the following polices of the *Northeast Los Angeles Community Plan*:

> Policy 8-1.3 - Encourage design of building and facilities in accordance with principles that minimize opportunities for crime and enhance personal safety.
>
> Goal 10 - A system of freeways, highways and streets that provides a circulation system which supports existing, approved, and planned land uses while maintaining a desired level of service at all intersections.
>
> Goal 15 - The revitalization of a physical environment conducive to increasing and improving economic activity.
>
> Objective 15-1 - To improve the visual environment of existing commercial and industrial areas.
>
> Policy 15-1.3 - Assess the needs of commercial and industrial areas to retain and improve their functional and aesthetic character.

In addition to above, the following can also be met due to the widening of the sidewalk along Mariondale Avenue and development of the Minimum Turning Area at the end of Mariondale Avenue:

> Goal 13 A system of safe, efficient, and attractive pedestrian, bicycle, and equestrian routes.

Objective 13-1 To promote an adequate system of safe bikeways for commuter, school and recreational use.

Objective 13-2 To promote pedestrian-oriented areas, greenways, and pedestrian routes for commuter, school, recreational use, economic revitalization, and access to transit facilities.

Some of the policies of the section of the *Northeast Los Angeles Community Plan* titled, "*Design Policies for Individual Projects (Commercial and Industrial)"* are met by this project, as it relates to the enhancing of public safety by. Policy 3.c. calls for the provision of clear, well-lit paths to commercial and industrial destinations from public streets. Policy 3.d. calls for the provision of security devices, such as walls and gates, where necessary, to control access. Street lights are currently provided along Mariondale Avenue from Valley Boulevard to the entry point. A security fence is proposed near the Guard Station to control access to the Upper Campus area.

City Community Redevelopment Plan - The project site is located within the Adelante Eastside Community Redevelopment Area. The Adelante Eastside Redevelopment Area contains approximately 2,200 acres of industrial and commercial areas, generally south of Olympic Boulevard to the city limits of Vernon from the Los Angeles River to Indiana Street; North Main Street east to Valley Boulevard and Alhambra Avenue to the city limits of Alhambra; and all east - west commercial streets in Boyle Heights such as Cesar Chavez Avenue, First Street, Fourth Street and Whittier Boulevard from the Los Angeles River to Indiana Street. The principal thrust of the project is the preservation of industrial and commercial uses within the community to promote a stable industrial base to provide jobs for the community, as well as enhancing the existing shopping areas to provide alternative commercial choices for residents.

On June 28, 2011, Governor Jerry Brown signed into law two bills that amended California Community Redevelopment Law to address the state's ongoing budget deficit. ABx1 26 dissolved all California redevelopment agencies (RDAs) effective October 1, 2011. This legislation prevented RDAs from engaging in new activities and outlined a process for winding down the RDA's financial affairs. It also set forth a process for distributing funds from the former RDAs to other local taxing entities. According to the Community Redevelopment Agency of Los Angeles (CRA/LA) website, ABx1-26 did not abolish the 31 existing Redevelopment Plans within the City. The land-use authorities in the Redevelopment Plans remain in effect and continue to be administered by the CRA/LA until transferred to the Department of City Planning.

The original RDA Plan was adopted in March 30, 1999. Within the Project Objectives of the Plan as it relates to Industrial uses, Policy 20 states: "Provide for the conservation of existing industrial uses through rehabilitation, revitalization and expansion." The proposed project would aid in the revitalization of the project area, by providing pedestrian access along Valley Boulevard and Mariondale Avenue by repairing damaged curbs, gutters, and sidewalks, and community beautification by installation of new trees.

An amendment to the Plan was adopted on June 22. 2009. This amendment added Policy 23 to the Industrial Section of Project Objectives. This Policy states: "To create the BioMed Tech Focus Area to capitalize on development opportunities resulting from redevelopment activity within the Whiteside Project Area, the continuing investment in the LAC+USC Medical Center, and the expansion of the USC Health Sciences Campus, leading to the creation of jobs and other community benefits for area residents." One of the main occupants in the area is the Grifols Company. Grifols is a global healthcare company whose mission is to improve the health and well-being of people around the world.

Section 500 of the Plan contains the types of land uses permitted within the project areas. Sub-Section 504.2 (*Public Street Layout. Rights-of-Way and Easements*) calls for the street layout in the Project Area as illustrated on the Redevelopment Plan Map shall remain substantially in its existing configuration. However, streets may be abandoned as necessary for proper development of the Project Area. One of the goals of the vacation request is to create a more secure complex.

Sub-Section 514. (*Parking and Loading Facilities*) calls for off-street parking to be provided in a manner consistent with standards for contemporary development practices, but in no case, shall off-street parking be less than the requirements of the Los Angeles Municipal Code. The development of properties here provided the minimum number of off-street parking required at the time of development.

Freeway Adjacent Advisory Notice for Sensitive Uses - A majority of the project site is located within the Freeway Adjacent Advisory Notice for Sensitive Uses Boundary (Zoning Information (ZI) Number 2427). The boundary became effective on November 8, 2012. The City Planning Commission (CPC) has taken an increased interest in projects classified as sensitive receptor sites, particularly schools and residential uses, in close proximity to freeways. The proposed project and the underlying uses on the property are not considered sensitive receptor sites. As such this notification requirement is not applicable to the proposed project.

Initial screening determined that the proposed project would cause no impact or less than significant impact. (see Appendix A)

K. Mineral Resources

Federal, State and City agencies regulate or have documented the presence of mineral resources. The State Geologist, California Division of Mines and Geology (CDMG), and State Mining and Geology Board (SMGB) provides assistance and direction with regard to mineral resources. The SMGB uses a classification system that divides land into four Mineral Resource Zones (MRZ) based on quantity and significance of mineral resources. Projects located within the MRZ-2 designation are subject to City policies established in Section VII, *Mineral Resources*, of the City of Los Angeles, General Plan, *Conservation Element*. According to Exhibit A: *Mineral Resources of the Conservation Element*, the project site is not located in an area designated as MRZ-2 or other known or potential

mineral resource area, including those noted in the *Conservation Element* as being of local importance, and would not result in loss of access to any such mineral resource area.

As such, implementation of the Proposed Project would not result in permanent loss of, or loss of access to, a mineral resource that is located within a MRZ-2 area or other known or potential mineral resource area, including those noted in the *Conservation Element* as being of local importance.

Initial screening determined that the proposed project would cause no impact. (see Appendix A)

L. Noise

City of Los Angeles Ambient Noise Levels - During any construction activities (i.e., road improvements, new entry area, etc.) any construction activities would meet the requirements of the City of Los Angeles Municipal Code (LAMC) *Noise Ordinance* (Ordinance No. 144.331, et. seq.). The *Noise Ordinance* presumes ambient noise levels in *Residential, Commercial and Manufacturing Zones*. Table 7 shows the ambient noise levels during daytime hours (7:00AM to 10:00PM) and nighttime hours (10:00PM to 7:00AM). During construction activities, there is a very slight potential for impacts by the creation of noise during the construction process. Compliance to the LAMC (i.e., Section 112.03 et seq. - *Construction Noise* and Section 41.40 - *Noise Due to Construction Excavation Work – When Prohibited*) should reduce this impact to a less than significant level.

TABLE 7 - PRESUMED AMBIENT NOISE LEVEL (DB(A))

ZONING TYPES	DAYTIME (1)	NIGHTTIME (2)
Agricultural/Residential (A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5)	50	40
Commercial (P, PB, CR, C1, C1.5, C2, C4, C5, and CM)	60	55
Manufacturing (M1, MR1, and MR2)	65	65
Manufacturing (M2 and M3)	70	70

Source: Los Angeles Municipal Code, Chapter XI, *Noise Regulation* (Added by Ord. No. 144,331, Eff. 3/2/73.), Article 1, *General Provisions*, Section 111.03, *Minimum Ambient Noise Level*, Table II *Sound Level "A" Decibels*
Notes:
1. Daytime - 7:00 a.m. to 10:00 p.m.
2. Nighttime - 10:00 p.m. to 7:00 a.m.

City of Los Angeles Noise Related Ordinances - The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. *Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited)* of the LAMC indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m., since such activities would generate loud noises and disturb persons occupying sleeping quarters in

any adjacent dwelling, hotel, apartment or other place of residence. Under certain conditions, the City may grant a waiver to allow limited construction activities to occur outside of the limits described above.

Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools) of the LAMC also specifies the maximum noise level for powered equipment and powered hand tools. Any powered equipment or hand tool that produces a maximum noise level exceeding 75 A-weighted decibels (dBA) at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

Tables 8 and 9 indicated the noise levels for various types of equipment that would be at the project site and the noise levels for construction related noise levels.

TABLE 8 - CONSTRUCTION EQUIPMENT NOISE LEVEL RANGES

CONSTRUCTION EQUIPMENT	NOISE LEVEL AT 50 FEET (dBA, L_{EQ})	CONSTRUCTION EQUIPMENT	NOISE LEVEL AT 50 FEET (dBA, L_{EQ})
Backhoe	73-95	Dump Truck	82-95
Compressor	75-87	Jackhammer	81-98
Concrete Mixer Truck	75-88	Saws	72-82
Source: City of Los Angeles CEQA Thresholds Guide 2006			

TABLE 7 - TYPICAL OUTDOOR CONSTRUCTION NOISE LEVELS

CONSTRUCTION METHOD	NOISE LEVEL AT 50 FEET (dBA, LEQ)	NOISE LEVEL AT 50 FEET WITH MUFFLERS (dBA)
Ground Clearing	84	82
Site Preparation	89	86
Foundations	78	77
Structural	85	83
Finishing	89	86
Source: USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971.		

Sensitive Receptors – The nearest sensitive receptors found in residentially zoned areas is approximately two hundred fifty-feet (250') to the south, behind commercial uses that line Valley Boulevard. From the Minimum Turning Area, the nearest residentially zoned area is approximately eight hundred-feet (850') to the south. Due to the distances from the construction site to the residentially zoned area, the vacation of the streets and associated improvements associated with the vacation would not impact these sensitive receptors.

Initial screening determined that the proposed project would cause less than significant impact. (see Appendix A)

M. Population and Housing

The project site does not contain any housing units, nor does it propose to construct any housing units. Other than the construction of the Guard Shack, no addition construction is proposed that would increase a need for additional housing. As such there will be no impact to population or housing.

Initial screening determined that the proposed project would cause no impact. (see Appendix A)

N. Public Services

The project site is served by the Los Angeles Fire Department (LAFD) and Los Angeles Police Department (LAPD).

Los Angeles Fire Department

The nearest fire station is Station No. 16, located at 2011 N Eastern Ave, Los Angeles, CA 90032. It is part of LAFD Battalion 2 and the Central Bureau. The station contains an Engine (LAFD Triple Combination Fire Engine – this Engine can pump water, carry hose, and have a water tank). The project site is located approximately 1.4 miles from Station 16. This is within the LAFD's maximum response distance of 1.5 miles.

Chapter 5 (*Fire Service Features*) of the 2014 *City of Los Angeles Fire Code* contains standards related to fire services that must be complied with for buildings, structures and premises with the project area, as applicable. The project will comply with these requirements. Key sections within this Chapter that must be complied with as it relates to the vacation request and associated construction activities include:

The project calls for the vacation of Mariondale Avenue and Lillyvale Avenue, an easement is required to permit access from a public maintained road to any of the facilities within the project areas. Section 503.1.6 (*Easements*) states that where fire lanes are required under Section 503.1.4 to provide access for Fire Department emergency vehicles, and such fire lanes are other than access roads, they shall be granted to the City without cost as easements from a public street or alley to the required terminal point. Provided, however, that the easement requirement may be waived, unless otherwise required by the General Plan of the City of Los Angeles, where the Department determines that the acquisition of an easement is not necessary for the protection of the public safety and welfare. Fire lanes shall be designated and maintained as follows:

The project proposes the installation of securing fencing around the project site, to include a security gate across Mariondale Avenue, Section 503.4.2 (*Fire Lane Maintenance*) states that "Any person owning or having control of any facility, structure, group of structures or premises, shall maintain all fire lanes in an unobstructed manner." There is an exception

that states – "Gates and gate devices allowed, provided they are approved by the Department."

The project proposes a security gate will be installed across Mariondale Avenue. Section 503.6 (*Security Gates*) states that the installation of security gates across a fire apparatus access road shall be approved by the fire chief. Where security gates are installed, they shall have an approved means of emergency operation. The security gates and the emergency operation shall be maintained operational at all times. Electric gate operators, where provided, shall be listed in accordance with Underwriters Laboratory (UL) 325. Gates intended for automatic operation shall be designed, constructed and installed to comply with the requirements of American Society of Testing and Materials (ASTM) F 2200.

Section 506 (*Key Boxes*) Sub-section 506.1 (*Where Required*) states that where access to or within a structure or an area is restricted because of secured openings or where immediate access is necessary for life-saving or fire-fighting purposes, the Fire Code Official is authorized to require a key box to be installed in an approved location. The key box shall be of an approved type listed in accordance with UL 1037, and shall contain keys to gain necessary access as required by the fire code official. The LAFD Fire Prevention Service and Public Safety Bureau's Requirement Number 75 (*Key Access Box Standards*) provides the standard that must be met for these Access Boxes. This key box requirement is needed with the guard house may be unmanned. As an example, the security guard is providing support at the site of an emergency.

Los Angeles Police Department

The nearest police station is the Hollenbeck Station, located at 2111 E 1st St, Los Angeles, CA 90033. It is part of the LAPD Central Bureau. The project site itself is within LAPD Reporting District 438 (Car 4A9). Time to travel from the Police Station to the project site is about nine minutes in normal traffic. However, response time would be quicker from the local beat car, depending on where they are patrolling when the call comes in. Currently the LAPD has a goal of responding to high priority calls within seven minutes and 40 minutes for non-emergency calls.

Discussion with the LAPD indicates that they do not have a standard for access to secured sites, such as that the LAFD has. If emergency access is needed at the project site, the LAPD could get into the project site from the security guard within the Guard Shack or enter once the LAFD arrives and opens the gate, if the Guard Shack is not occupied.

Initial screening determined that the proposed project would cause less than significant impact. (see Appendix A)

O. Recreation

The project site does not contain any public recreational resources. The project does not propose to construct any public recreational resource. Other than the construction of the Guard Shack, no addition construction is proposed that would increase a need for

additional recreational areas. As such there will be no impact to population or housing.

Initial screening determined that the proposed project would cause no impact. (see Appendix A)

P. Transportation/Traffic

Existing Roadways

The *Northeast Los Angeles Community Plan Circulation Plan* designates Valley Boulevard as a Major Highway, Class II, while the *City General Plan Mobility Element* designates Valley Boulevard as a Major Highway, Avenue I. While the Plan and Element use different terms to describe these streets, Valley Boulevard with have an ultimate ROW of one hundred-feet, a roadway of seventy-feet, with two fifteen-foot sidewalks on either side of the roadway. These widths are in accordance with the *Department of Public Works, Bureau of Engineering Standard Street Dimensions*, Standard Plan S-470-1. Where Valley Boulevard crosses Mariondale Avenue the parkway along the north side of Valley Boulevard is approximately ten-feet wide in this area, less that the width called for within Standard Plan S-470-1.

Mariondale Avenue and Lillyvale Avenue are designated as Local Streets in the *Northeast Los Angeles Community Plan Circulation Plan.* According to Standard Plan S-470-1, local streets have a ROW of sixty-feet and a Roadway of thirty-six-feet, with two twelve-foot sidewalks on either side of the Roadway. At this location Mariondale Avenues has a ROW of approximately fifty-two-feet, eight-feet less than the standard width of sixty-feet for a local street ROW. The Roadway has a width of forty-four-feet. The adjoining sidewalks have a width of four-feet. Conditions of approval has been included for the dedication of sufficient property to create a ROW of sixty-feet and for the construction of an eight-foot wide sidewalk.

Lillyvale Avenue meets the Local Street standards as to ROW (sixty-feet), Roadway (thirty-six-feet) and sidewalks (twelve-feet).

Existing Traffic Activities

The City of Los Angeles, Department of Transportation is responsible for the conducting of traffic counts on various streets within the City of Los Angele. These counts are used for a variety of activities – speed limits, installation of traffic control devices (i.e., stop signs, traffic signals, predict and analyze the circulation and congestion impacts of project-generated traffic, and identify feasible mitigation measures, etc.). The last traffic study conducted at the intersection of Mariondale Avenue and Valley Boulevard was conducted on May 16, 2007. The results of this study are noted in Table10. On March 6, 2014, a traffic count was taken at this intersection, but it was for traffic in and out of California State University (Mariondale Avenue right turn onto eastbound Valley Boulevard and Valley Boulevard right turn onto southbound Mariondale Avenue).

Table 10 – Traffic Counts (1, 2)						
COUNT STREET	**AT**	**DIRECTION**				**TOTAL**
		WEST	**EAST**	**NORTH (3)**	**SOUTH (4)**	
Mariondale Ave.	Valley Blvd.	N/A	N/A	4,926	854	5,780
Valley Blvd.	Mariondale Ave.	12,960	8,916	N/A	N/A	21,876
Source: City of Los Angeles, Department of Transportation, *10-Year Summary 2001 to 2010*, by Conducted by LADOT Traffic Survey Section. Count conducted on May 16, 2007. Notes: 1. No 24-hour counts conducted at this location since 2007. 2. On March 6, 2014 a traffic count was taken, but it was for traffic in and out of California State University, Los Angeles (Mariondale Avenue right turn onto eastbound Valley Boulevard and Valley Boulevard right turn onto southbound Mariondale Avenue). 3. Leaving California State University, Los Angeles. 4. Leaving project site and other business located on Mariondale Avenue, north of Valley Boulevard.						

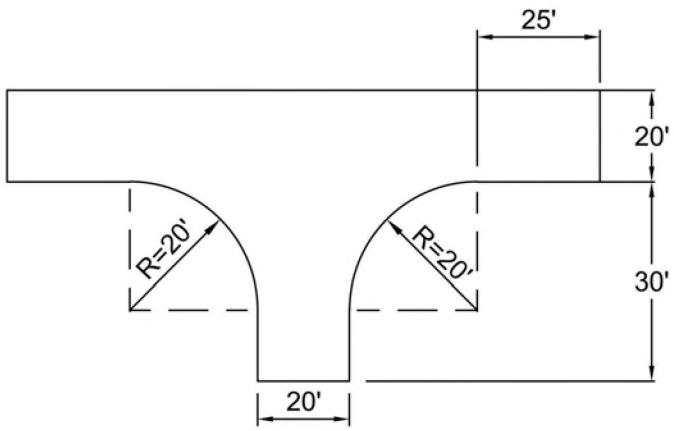
Proposed Road Improvements

As part of the vacation process, the Bureau of Engineering, Central District office is requesting three areas in which improvements are to be completed within the project area. Where the public right-of-way terminates at the vacated portion of Mariondale Avenue, there will be constructed a standard *Minimum Turning Area per Standard Plan S-470-1* (Sheet 3 of 4). The Minimum Turning Area design in shown in Figure 6, below.

For that portion of Mariondale Avenue, just north of Valley Boulevard, a full eight-foot wide sidewalk will be constructed. The sidewalk currently has a width of only four-feet. For both the construction of the Minimum Turning Area and the widening of the sidewalk, sufficient right-of-way will be dedicated to the City of Los Angeles. These activities may result in the removal of a single tree, depending on the timing of the project. IF the tree was removed prior to the dedication, no replacement would be required. IF the tree was removed after the dedication, replacement on a ratio of two-to-one would be required.

For that portion of Valley Boulevard adjacent to the project site, the Central District Office is requiring the repair any damaged curb, gutter, and sidewalk and close all unused driveways along Valley Boulevard. These activities may result in the removal of up to twenty-five trees (*Ficus benjamina* (Weeping Fig) or *Ficus microcarpa* (Chinese banyan)) depending on the amount of damaged curb, gutter, and sidewalk to be replaced and the number of unused driveways that would be closed. All improvements must meet the design standards of the City Mobility Element 2035, adopted in 2015.

FIGURE 6 - MINIMUM TURNING AREA (PLAN VIEW)



MINIMUM TURNING AREA
(PLAN VIEW)

Source: City of Los Angeles, Bureau of Engineering, *Standard Plan S-470-1*, Sheet 3 of 4.

Valley Boulevard improvements

Sidewalks –

As previously noted the parkway area on this side of Valley Boulevard is generally ten-feet in width. No additional dedication to expand the width of the sidewalk is proposed as Valley Boulevard is also at its planned right-of-way width of one-hundred-feet.

Note 5 of the City of Los Angeles Standard Plans for *Sidewalks* (Standard Plan S-444-0) states that sidewalks are to have a minimum width of five-feet. This width of five-feet does not include the adjoining curb (typically six-inches in width). Note 6 of the City of Los Angeles Standard Plans for *Sidewalks* (Standard Plan S-444-0) states that sidewalks that are less than five-feet in width will require approval of the City Engineer. Note 6 also states that 'passing spaces' of at least five-feet by five-feet, at intervals no greater than two hundred-feet, must be provided. Per Note 11 of the City of Los Angeles Standard Plans for *Sidewalks* (Standard Plan S-444-0) it notes that sidewalks and adjoining curbs must have a minimum width of five-feet, six-inches. This note also states that at locations where this requirement cannot be met, the project designer and/or contractor shall request direction from the City Engineer prior to completion of the design of the improvements.

As such the width of the existing sidewalk meets the requires of Standard Plan S-444-0. Sufficient area exists adjacent to any proposed tree wells to meet the width of sidewalk of five feet.

Street Tree Replacement

Street trees are located along Valley Boulevard. The street trees along Valley Boulevard are *Ficus benjamina* (Weeping Fig) or *Ficus microcarpa* (Chinese banyan). Along Valley Boulevard many of these street trees are causing the adjoining sidewalk, curb, and gutter to lift, making it difficult for pedestrians to walk along the sidewalk area. Figure 7 shows an example of this lifting along Valley Boulevard.

No street trees are currently located within the right-of-way of Mariondale Avenue There is a single tree, of an unknown species, that is located within the future dedication.

A Board of Public Works Policy calls for the replacement of removed street trees with a ratio of 2:1, two replacement trees for each tree removed. With a potential of twenty-five street trees to be removed, up to fifty street trees could be planted as replacements. The actual number to be removed would be dependent on the condition of the adjoining sidewalk, curbs, and gutters along Valley Boulevard and the timing of the construction of the sidewalk on Mariondale Avenue.

As it relates to this project, approximately one-half of the replacement street trees (up to twenty-five) would be planted along Valley Boulevard. The remaining half, along with the possible replacement trees for Mariondale Avenue would be planted in the general area of the project, as designated by the Bureau of Street Services, Urban Forestry Division (BOSS/UFD). The BOSS/UFD has a listing of over 150 street trees that could be planted as replacements. A listing of appropriate trees can be found at: http://bss.lacity.org/UrbanForestry/StreetTreeSelectionGuide.htm. This list is not all inclusive and other species may be considered.

Haul Route Discussion

As found in Section F (*Geology and Soils*) the project site is within the Special Grading Area, as shown on the Bureau of Engineering (BOE) Basic Grid Map A-13372. The Los Angeles Department of Building and Safety's (LABDS) has implement guidelines related to the import or export of more than one thousand cubic yards of soil in hillside areas, as designated by the current Bureau of Engineering Basic Grid Map No. A-13372, and as referenced in ZIMAS, as a "Special Grading Area." While initial review and calculations indicated that less than one thousand cubic yards of soil will be imported or exported, if this limitation is exceeded a Haul Route Permit must be applied for.

As part of the Haul Route Permit application a Haul Route Questionnaire and an Environmental Review Questionnaire must be completed. Part of the Haul Route Questionnaire deals with the truck routes that might be used for the empty and loaded trucks. The most direct Haul Route for this project, as it relates to the export of soil would be from the project site; to Valley Boulevard; east on Valley Boulevard to the Long Beach Freeway (I-710); then south on the I-710 to the destination. The most direct route for the return of empty trucks would be the opposite.

FIGURE 7 – SIDEWALK LIFTING, VALLEY BOULEVARD

Part of the Environmental Review Questionnaire deals with any environmental review that might have been completed for the project. As part of this IS/ND various aspects of the project's potential environmental impacts were identified. This to include air quality, grading/soil and traffic/transportation issues.

Table 4 was prepared to provide an estimate as to the number of trucks that might be used as part of the grading (i.e., Minimum Turning Area and sidewalk improvements) activities occurring at the project site. It is estimated that between 49 and 68 trucks might be used to transport soil to/from the project site. As it relates to other vehicles, for purposes of air quality, an estimated nine vehicles per day (average) would be working at the project site. Other than the construction of the Guard Station, security fencing, and road improvements, no addition construction is proposed that would increase a need for additional capacity or improvements to the existing circulation patterns in or near the project area.

Initial screening determined that the proposed project would cause less than significant impact. (see Appendix A)

Q. Utilities and Service Systems

Table 11 provides a listing of utilities found within the area in which the vacation will take place.

TABLE 11 – UTILITIES AT THE PROJECT SITE		
UTILITY	**SERVICE PROVIDED**	**WHAT IS THERE**
ATT	Telephone, Internet, Cable	Unknown capacity, above ground
LA Bureau of Sanitation	Sewage Removal	Eight-inch sewage pipe
LA Bureau of Sanitation	Storm Water Removal	Catch basin and twenty-four-inch drainage line
LA Bureau of Street Lighting	Street Lights	Five street lights (52 watt, LED)
LA Bureau of Street Services	Street Trees	Various trees. None to be removed.
LA Department of Water and Power	Water	Twelve-inch water pipe, three fire hydrants.
LA Department of Water and Power	Electricity	Unknown capacity, above ground
Southern California Gas Company	Natural Gas	Three-inch line
Time Warner Cable	Cable, Internet & Telephone	Unknown capacity, above ground

Easements will be granted to existing utility providers located at or near the project site (i.e., Los Angeles Department of Water and Power, Southern California Gas Company, ATT, Time Warner Cable, and City of Los Angeles Bureau of Street Lighting, Bureau of Sanitation, and Public Works, etc.).

Initial screening determined that the proposed project would cause no impact (see Appendix A)

R. Mandatory Findings of Significance

Based on the foregoing, it has been determined that:

The project does not 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 plant or animal species listed on any state or federal lists for endangered, threatened or special status species are expected to be found on the project site due to the lack of suitable habitat. There are no known cultural resources are expected to be found on the project site.

The project does not 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. There are eight (8) existing projects underway or proposed projects within the overall project area. These projects have been previously evaluated and approved by another City Agency. These projects would be allowed to continue, with or without the proposed project (i.e., vacation, Guard Shack, security fencing, road improvements, etc.) being approved. Project-level traffic impacts during construction were less than significant. Therefore, no mitigation measures are required. As a result, construction of the project would not result in a cumulative considerable contribution to a significant cumulative traffic impact to construction. Operation of the proposed project would not result in significant impacts because the proposed project would not generate substantial new measurable and regular vehicle trips during the operations period, and long-term mitigation measures are therefore not required. Based on the above, significant cumulative impacts from related-projects are not anticipated in any of the impact categories. The proposed project is consistent with local and regional land use, air quality, water quality, and transportation plans. In addition, the proposed project is not expected to make a cumulatively considerable contribution to a significant cumulative impact. The impact is anticipated to be less than significant.

The project does not have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. The overall purpose for the proposed project is to create two private streets, relocate the Corporate entrance to the Upper Campus for security reasons, and to create efficiency of goods movement within the project site. Construction activities within the project area include: Construction of a new security fence around the Guard Shack; construction of an enclosed Guard Shack near the main entrance off Mariondale Avenue, near the vacated Lillyvale Avenue; and construct a standard Minimum Turning.

V. MITIGATION MEASURES

No significant environmental impacts have been identified as part of this project and as such no mitigation measures are proposed for this project. However, compliance with existing City, County, Regional, State, and Federal Environmental Standards, Regulations, and Ordinances and City Best Management Practices (BMP's) will minimize possible environmental impacts caused by this project.

VI. PREPARATION AND CONSULTATION

A. PREPARER

James R. Tebbetts, Environmental Specialist II
City of Los Angeles, Bureau of Engineering, Environmental Management Group

B. COORDINATION AND CONSULTATION

Grifols Company
Gregory G. Rich, President and Chief Executive Officer

Willie Zuniga, President
Timothy Quille, PE, Director of Engineering
Karen Glenn, Public Affairs Manager

City of Los Angeles, Fire Department
Captain Duc Nguyen, Commander Central Industrial Unit
Captain Hernandez, LAFD Central Bureau
Tiana Muñoz, Management Analyst II, Operations Central Bureau

City of Los Angeles, Police Department
Regional Crime Center (Real Time Analysis and Critical Response Division)
Commission Investigation Division (Alarms)

Community Redevelopment Agency/Los Angeles Permit Counter
Craig Bullock

City of Los Angeles, Bureau of Engineering, Land Development and GIS Division
Thein Crocker, Civil Engineer
Phillip Martinez, Civil Engineer

City of Los Angeles, Mayor's Office, Office of Economic Development
Jasson Crockett, Business Development Manager

City of Los Angeles, Council District 14
Zenay Loera, District Director
Nate Hayward, Public Works Director
Julio Torres, Field Deputy

City of Los Angeles, Bureau of Street Services
Urban Forestry Division (various)

VII. DETERMINATION - RECOMMENDED ENVIRONMENTAL DOCUMENTATION

A. Summary

The purpose of the request is to fully vacate Lillyvale Avenue, partially vacate Mariondale Avenue, locate a corporate entrance to the Upper Campus near the intersection of vacated Mariondale and Lillyvale Avenues for increased security reasons, construct a Guard Station and a security fence around the proposed Guard Station area, and create an efficiency of goods movement within the project site.

Compliance with existing City, County, Regional, State, and Federal Environmental Standards, Regulations, and Ordinances and City Best Management Practices (BMP's) will minimize environmental impacts caused by this project. No significant environmental impacts have been identified as part of this project.

B. Recommended Environmental Documentation

On the basis of this initial evaluation:

X 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.

Prepared By: _____
James R Tebbetts, ESII

Approved By: Gary Lee Moore, P.E. ENV SP
City Engineer

By: _____
Maria Martin, Manager
Environmental Management Division

APPENDICES
A. Environmental Screening Checklist
B. Cultural Resources Records Search Request
C. City of Los Angeles Planning Department Letter
D. Letters and Comments from Affected Private and Public Agencies
E. Site Plans and Elevations

VIII. REFERENCES:

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IX. REVISIONS AND CLARIFICATIONS, AND COMMENTS AND RESPONSES

In this Final Initial Study, edits to the Draft Initial Study text () are noted by ~~strike through text~~ for deletions and *"underlined italicized text"* for insertions. Additionally, Section IX, added to the Initial Study hereto, provides comments to the Draft IS/ND, and responses to the comments, received during the public review period.

Clarifications and modifications were made to the "Project Activities" description (See section IIC, p. 8 of 65) to update the Draft IS/ND. In addition, comments, and responses to the comments received during the public review period, are also included below. The Draft IS/ND along with these changes constitute the Final IS/ND, to be presented to the City of Los Angeles City Council for adoption and project approval. None of the changes to the IS/ND would require recirculation. Revisions made to the IS/ND have not resulted in new significant impacts or new mitigation measures, nor has the severity of an impact increased. None of the CEQA criteria for recirculation (State CEQA Guidelines §15073.5) have been met, and recirculation of the IS/ND is not warranted.

During the public review period, three comment letters were received. Please refer to the Response to Comments Section for referenced comment letters, corresponding comments and responses.

Comments and Responses

This section contains a reproduction of the comments received during the public review period and responses to these comments.

Letter 1:

From: **Wilber** <wduran_3@yahoo.com>
Date: Mon, Aug 14, 2017 at 2:59 PM
Subject: Mariondale Avenue and Lillyvale Avenue vacation project
To: "james.tebbetts@lacity.org" <james.tebbetts@lacity.org>To who home it may concern.

Dear city of Los Angeles representative,

I am writing to you in response to the letter I received from the Department of Public Works with regards to the project
Mariondale Avenue and Lillyvale Avenue vacation district project. I am a resident of the condominium complex located in the south side of Valley Blvd. To be exact, I live in 2339 Lillyvale Ave, #161, Los Angeles CA 90032. My initial concerned for writing this letter was to obtain a clearer explanation of the lines "vacate a portion of Mariondale Avenue, between Lillyvale Ave....". Even[ ]though I have studied the map online and it looks like the project will be [to] build on the other side of the Valley Blvd, from my house, I still like to confirm that nobody will be ask to leave the area where my condominium complex is located? 1a

Now, my second concern is the congestions that the construction may cause during that period of time. The intersection of Valley Blvd and Mariondale Ave is a very busy area during the school season of Cal State LA, University. I am a CSULA alumni, who is currently an Engineer working for the Northrop Grumman Company, and therefore I understand very well the terrible traffic that this construction may cause on all of us. Currently, there is a construction occurring in the south part of Cal State LA, next to the dorms' area. Every day, heavy loaded trucks drive through the Mariondale street from early morning till later after noon. This noise disturbance is very stressful for residents such as myself whose apartment is facing the Mariondale Ave side. Even though, the document in your website states that the impact will be very minimal, I really want to bring this up to you anyways. Most of the time, what's stated on documents do not get reflected when the project is been executed. Therefore[, I] try to make sure that that these constructional vehicles do not use our surrounding areas. 1b

As my final conclusion, my message is that I oppose to this project if it affects any of the following: 1. requires any of the Lillyvale Condominium complex residents to vacate or leave our housing, 2. Increases the[level of] traffic at the Valley and Mariondale intersection, 3. [Increases the number of] heavy trucks creating noise disturbance and use our streets for parking. 1c

Thanks for giving me the opportunity to give my opinion and comments with regards to this project. I wish the project gets executed with intelligence and wisely for the good of our surrounding communities.

Regards,

Wilber L Duran

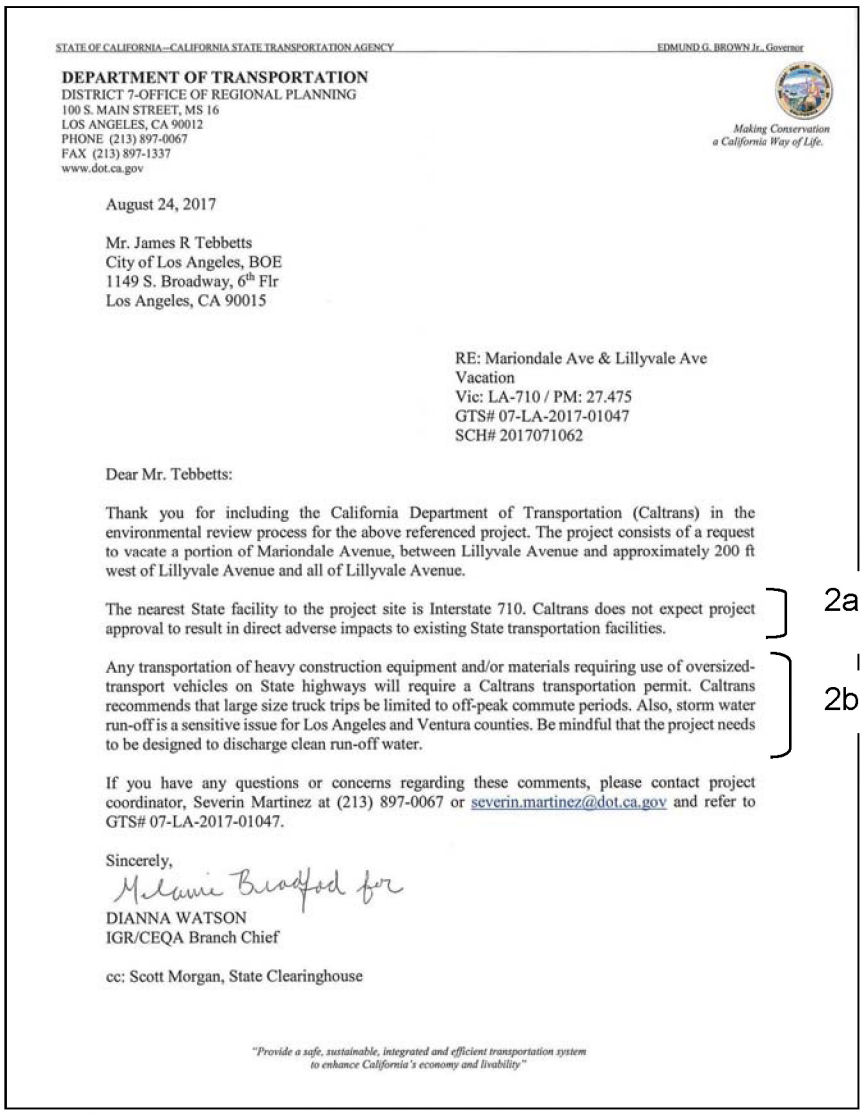
Letter 1, Responses:

1a: Comment Noted. The vacation will occur on the north side of Valley Boulevard, approximately 1,100-feet from the commenter's property. No vacation or construction activities will occur on the south side of Valley Boulevard. There is no requirement to ask a person or business to leave the area where construction activities would occur,

based on normal construction activities and standards. Work would occur within existing or proposed rights-of-way and/or areas vacated by this project.

1b: Comment Noted. The great majority of work will occur where Mariondale Avenue and Lillyvale Avenue intersect. Here, construction related to roadwork, installation of fencing, and the guard building will occur. As proposed by various City Agencies, some work may occur along Valley Boulevard and Mariondale Avenue. Based on similar projects, it is expected that construction vehicles and vehicles of employees of company(s) hired for the work would most likely use Valley Boulevard and the Long Beach Freeway (I-710) to gain access to the project site. As it relates to construction vehicles, it is unlikely that vehicles will access the community to the south, which includes the California State University, Los Angeles (CSULA) campus.
The nearest work area, along Valley Boulevard (east of Mariondale Avenue) to the commenter's property is approximately 370-feet linear away. Work at the intersection of Valley Boulevard and Mariondale Avenue is 440-feet away, while work at Mariondale Avenue and Lillyvale Avenue is 1,100-feet away. Additionally, the work at Mariondale Avenue and Lillyvale Avenue is approximately 60-feet in elevation above the commenter's property.

1c: Comment Noted.
1. This project will not require people to vacate or leave the property at 2339 Lillyvale Avenue.
2. The project will have a temporary increase in traffic (construction vehicles, employees), for the construction of proposed infrastructure improvements. Once construction activities are complete, traffic will revert to normal levels. According to Table 5 (*Existing Year 2016 Intersection Peak Hour Level of Service*) of Chapter 3.3 (*Traffic and Circulation*) the CSULA's *North Campus Project Environmental Impact Report*, both Valley Boulevard and Mariondale Avenue have Levels of Service (LOS) of A for both the AM and PM timeframes. According to Table 7 (*Existing Plus Project Intersection Peak Hour Level of Service*) after completion of the North Campus Project, both Valley Boulevard and Mariondale Avenue will continue to have a LOS of A for both AM and PM timeframes. LOS A is defined and indicates that vehicles experience little delay in passing through the intersection.
3. The property where the commenter lives is approximately 370-feet away from the nearest work area. The minimal increase in construction traffic should not impact the commenter's property due to this distance. The areas in which work would occur is sufficiently far enough to preclude any contractors hired for this project to use streets adjacent to the commenter's property for parking or access.



STATE OF CALIFORNIA--CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
www.dot.ca.gov

Making Conservation a California Way of Life.

August 24, 2017

Mr. James R Tebbetts
City of Los Angeles, BOE
1149 S. Broadway, 6th Flr
Los Angeles, CA 90015

RE: Mariondale Ave & Lillyvale Ave Vacation
Vic: LA-710 / PM: 27.475
GTS# 07-LA-2017-01047
SCH# 2017071062

Dear Mr. Tebbetts:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project consists of a request to vacate a portion of Mariondale Avenue, between Lillyvale Avenue and approximately 200 ft west of Lillyvale Avenue and all of Lillyvale Avenue.

The nearest State facility to the project site is Interstate 710. Caltrans does not expect project approval to result in direct adverse impacts to existing State transportation facilities. 2a

Any transportation of heavy construction equipment and/or materials requiring use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods. Also, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Be mindful that the project needs to be designed to discharge clean run-off water. 2b

If you have any questions or concerns regarding these comments, please contact project coordinator, Severin Martinez at (213) 897-0067 or severin.martinez@dot.ca.gov and refer to GTS# 07-LA-2017-01047.

Sincerely,

Melanie Bradford for

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Letter 2

Letter 2, Responses:
2a. Comment Noted.

2b. Comment Noted
Based on similar activities, it is expected that construction vehicles and vehicles of employees of company(s) hired for the work would most likely use Valley Boulevard and the Long Beach Freeway (I-710) to gain access to the project site. Project activities would comply with City of Los Angeles Standards and Specifications, and NPDES Permit requirements.

Comment Letter 3:

FORM GEN. 160 (Rev. 8-12)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: August 23, 2017

TO: Vincent P. Bertoni, Director of Planning
Department of City Planning

Attn: James R. Tebbetts, Environmental Specialist
Department of City Planning

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation

SUBJECT: **NOTICE OF AVAILABILITY AND NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION FOR THE MARIONDALE AVENUE AND LILLYVALE AVENUE VACATION DISTRICT PROJECT (W.O. E1401293)**

This is in response to your July 26, 2017 letter requesting a review of your proposed Negative Declaration for the Mariondale Avenue and Lillyvale Avenue located northerly of Valley Boulevard, easterly of Mariondale Avenue, and southerly of the Union Pacific Railroad tracks in the Community of University Heights. LA Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to vacate a portion of Mariondale Avenue, to locate a corporate entrance to increase security, and construct a Guard Station, only.

Based on the project description, we have determined the project is unrelated to sewer capacity availability and therefore do not have sufficient details to offer an analysis at this time. Should the project description change, please continue to send us information so that we may determine if a sewer assessment is required in the future. 3a

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Program (WPP) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter VI, Article 4.4, of the Los Angeles Municipal Code), the Project shall comply with all mandatory provisions to the Stormwater Pollution Control Measures for Development Planning (LID Ordinance) and as it may be subsequently amended or modified. Prior to issuance of grading or building permits, the Applicant shall submit a LID Plan to the City of Los Angeles, Bureau of Sanitation, Watershed Protection Division (WPD), for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. 3b

File Location: FINAL CEQA Response LTRs\FINAL DRAFT\Mariondale Ave and Lillyvale Ave Vacation District Project (W.O.E1401293)- Notice of Intent.doc

Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lacitysan.org. It is advised that input regarding LID requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. Green Street standard plans can be found at: www.eng2.lacity.org/techdocs/stdplans/

CONSTRUCTION REQUIREMENTS

All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15. Additionally, construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

If there are questions regarding the stormwater requirements, please call WPP's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact LA Sanitation Solid Resources Recycling hotline 213-922-8300.

CD/AP:ra

c: Kosta Kaporis, LASAN
Abdulsamad Danishwar, LASAN

File Location: FINAL CEQA Response LTRs\FINAL DRAFT\Mariondale Ave and Lillyvale Ave Vacation District Project (W.O.E1401293)- Notice of Intent.doc

3b

Letter 3 Responses:
3a. Comment Noted.

3b. Additional information related to post construction mitigation requirements, green streets, construction requirements, and solid resource requirements are not applicable to this project.

APPENDIX A

ENVIRONMENTAL SCREENING CHECKLIST

A brief explanation is provided for all answers except "No Impact" answers that are adequately supported by the information sources cited following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

Issues	Potentially Significant Impact	Less Than Significant With [illegible]	Less Than Significant	No Impact
1. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially alters a view of a scenic vista. Reference: 18(Thresholds A.1 & A.2)				
Explanation: No scenic vistas exist on or near the project site. Adjoining properties contain industrial buildings, railroad tracks and yards, and commercial uses.				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
Standard: A significant impact may occur where scenic resources within a state scenic highway would be damaged or removed as a result of the proposed project. Reference: 18(Thresholds A.1 & E.3), 18(General Plan)				
Explanation: No state- or city-designated scenic highways are located within the vicinity of the project site.				
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project introduces incompatible visual elements to the project site or visual elements that would be incompatible with the character of the area surrounding the project site. Reference: 18(Thresholds A.1 and A.3)				
Explanation: The proposed project would not make any significant changes to the visual character that currently exists.				
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☐	☒
Standard: A significant impact would occur if the proposed project caused a substantial increase in ambient illumination levels beyond the property line or				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
caused new lighting to spill-over onto light-sensitive land uses such as residential, some commercial and institutional uses that require minimum illumination for proper function, and natural areas. Reference: 18(Thresholds A.4)				
Explanation: New outdoor lighting in the area of the entry and exit gates and Guard Shack will be limited to the minimum levels necessary for safety and security. The new light fixtures will be designed to prevent spill-over. There are no near-by natural areas, residential areas, commercial areas or institutional uses.				
2. AGRICULTURE AND FOREST 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?	☐	☐	☐	☒
Standard: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Reference: 14) A significant impact may occur if the proposed project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use. Reference: 4(Ag. Land Eval.)				
Explanation: The project site does not contain Farmland. The project site is currently developed with industrial buildings, off-street parking areas, and road right-of-way's (i.e., road, curb, gutter, sidewalks, etc.). Reference: 8(Farmland Map)				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were to result in the conversion of land zoned for agricultural use, or indicated under a Williamson Act contract, from agricultural use to another non-agricultural use.				
Explanation: The project site and adjacent parcels are not zoned for agricultural uses and are not subject to a Williamson Act contract.				
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
Standard: In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Reference: 8)				
Explanation: There is no forest land, timberland, or timberland zoned for timberland production on or near the project site. The project site is currently developed with industrial buildings, off-street parking areas, and road right-of-way's (i.e., road, curb, gutter, sidewalks, etc.). Reference: 10(BIOS)				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
Standard: In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Reference:				
Explanation: There is no forest land on or near the project site. The project site is currently developed with industrial buildings, off-street parking areas, and road right-of-way's (i.e., road, curb, gutter, sidewalks, etc.). Reference: 10(BIOS)				
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use?	☐	☐	☐	☒
Standard: A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use.				
Explanation: Refer to discussion under 2 (a) and 2 (b) above.				
3. AIR QUALITY – Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
Standard: A significant impact may occur if the project was inconsistent with or obstruct the implementation of the Air Quality Element of the City's General Plan or the Air Quality Management Plan (AQMP). Reference: 18(Thresholds B.1 to B.3), 31(AQMD Handbook)				
Explanation: The project does not involve long-term emissions.				
b) Violate any air quality standard or contribute substantially to an existing or projected air quality	☐	☐	☐	☒

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
violation?				
Standard: A significant impact may occur if the proposed project violated any SCAQMD air quality standard. The SCAQMD has set thresholds of significance for reactive organic gases (ROG), nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide ($S0_2$), and particulate matter (PM10) emissions resulting from construction and operation in the South Coast Air Basin. Reference: 18(Thresholds B.1, B.2), 31(AQMD Handbook)				
Explanation: Estimated air pollutant emissions during construction and operation would not exceed SCAQMD significance thresholds. The proposed project would not conflict with or obstruct implementation of the applicable air quality plan. (see discussion in Section IV)				
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project would result in a cumulatively considerable net increase of a criteria pollutant for which the South Coast Air Basin exceeds federal and state ambient air quality standards and has been designated as an area of non-attainment by the USEPA and/or California Air Resources Board. The South Coast Air Basin is a non-attainment area for carbon monoxide, nitrogen dioxide, ozone, particulate matter (PM10), and fine particulate matter (PM2.5). Reference: Reference: 18(Thresholds B.1, B.2), 31(AQMD Handbook)				
Explanation: Construction and operational emissions of the project would not exceed the SCAQMD's thresholds of significance for criteria pollutants. For those emissions generated during construction, the minor generation of criteria pollutants would be temporary and short-term in nature. (see discussion in Section IV)				
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
Standard: A significant impact may occur if construction or operation of the proposed project generated pollutant concentrations to a degree that would significantly affect sensitive receptors. Reference: 18 (Thresholds B.1 to B.3)				
Explanation: As discussed above, the proposed project is not anticipated to result in substantial pollutant concentrations. (see discussion in Section IV)				
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
Standard: During construction, sources of odor are diesel emissions form				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
construction equipment and volatile organic compounds from sealant applications or paving activities. However, these odors would be temporary and localized. Nonetheless, applicable best management practices such as those in SCAQMD Rule 431 (Diesel Equipment) would, in addition to minimizing air quality impacts, also help minimize potential construction odors. Reference: 18 (Thresholds B.1 & B.2)				
Explanation: Operation of the proposed project would not add any new odor sources. The project would not have any significant odor sources, and any odors generated would be similar to odors associated with the existing land uses. As a result, the proposed project's construction and operational activities would not create objectionable odors affecting a substantial number of people.				
4. 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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited. Reference: 18 (Thresholds C)				
Explanation: The California Department of Fish and Game (CDFG), *California Natural Diversity Database* indicates that species identified as an endangered, threatened or species of special concern occur or have occurred historically within the larger project area. However, the habitat for these species does not exist adjacent to or within project boundaries. Reference: 9(CNDDB), 10(BIOS). See discussion in Section IV.				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if riparian habitat or any other sensitive natural community were to be adversely modified. Reference: 18(Thresholds C)				
Explanation: The proposed project is not located within a Significant Ecological Area or other natural community containing riparian habitat or sensitive biological resources. Reference: 9(CNDDB), 10(BIOS), 32(Nat. Wetlands Map), 33(USGS Quad.). See explanation for 4(a).				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
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?	☐	☐	☐	☒
Standard: A significant impact may occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act would be modified or removed. Reference: 18(Thresholds C), 32(Nat. Wetlands Map)				
Explanation: There are no wetlands within or adjacent to the project site.				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project interferes or removes access to a migratory wildlife corridor or impedes the use of native wildlife nursery sites. Reference: 10(BIOS), 18(Thresholds C)				
Explanation: No sensitive habitats were identified within the project site or vicinity. The project area is highly urbanized and heavily used and does not provide significant habitat for wildlife. The project is not expected to have an impact on habitat suitable for wildlife movement or migration.				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project would cause an impact that is inconsistent with local regulations pertaining to biological resources. Reference: 10 (CDFG), 27(Tree Policy), 28(Urban Forest Program), 25(PW Tree Policy), 18(Thresholds C)				
Explanation: No heritage or protected tree species are present within the boundaries of the proposed project. If during construction of the Minimum Turning Area or sidewalk, trees within a dedicated street right-of-way are removed, they would be replaced on a ratio of two trees planted for each tree removed, per Board of Public Works Policy. 26(NavigateLA)				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project would be inconsistent with mapping or policies in any conservation plans of the cited type.				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
Reference: 9(CNDDB), 18(Thresholds C)				
Explanation: No habitat conservation plan, or any plan as cited above, is known to exist for the project site or immediate vicinity.				
5. 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?	☐	☐	☐	☒
Standard: A significant impact may result if the proposed project caused a substantial adverse change to the significance of a historical resource (as identified above). Reference: 14(Guidelines 15064.5), 18 (Thresholds D.3), 12(CHRIS)				
Explanation: The project will not affect a historical resource.				
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were to cause a substantial adverse change in the significance of an archaeological resource which falls under the CEQA Guidelines section cited above. Reference: 14(Guidelines 15064.5), 18 (Thresholds D.2), 12(CHRIS)				
Explanation: A Records Search conducted by the South Central Coastal Information Center indicates that no archeological work is needed prior to approval of the project plans. Standard specifications for public works projects stipulate, "If discovery is made of items of archaeological or paleontological interest, the Contractor shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Engineer." (Std. Specs Section 6-3.2).				
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
Standard: A significant impact may occur if grading or excavation activities associated with the proposed project would disturb unique paleontological resources or unique geologic features. Reference: 14(Guidelines 15064.5), 18(Thresholds D.1), 30 (Diblee), 12(CHRIS), 20(ZIMAS)				
Explanation: The project site is not within an area known to contain paleontological resources. Standard specifications for public works projects stipulate, "If discovery is made of items of archaeological or paleontological interest, the Contractor shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Engineer." (Std. Specs Section 6-3.2).				
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒
Standard: A significant impact may occur if grading or excavation activities associated with the proposed project would disturb interred human remains.				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
Reference: 14(Guidelines 15064.5), 18(Thresholds D.2), 12(CHRIS)				
Explanation: No known burial sites are located within the project site. The discovery of human remains is always a possibility during ground disturbances. If human remains are found, compliance with the State of California *Health and Safety Code,* Section 7050.5 will be accomplished.				
6. 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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located within a state-designated Alquist-Priolo Zone or other designated fault zone and appropriate building practices were not followed. References: 6(CDC Publ. 42), 18(Thresholds E.1)				
Explanation: The project site is not located in an Alquist-Priolo Earthquake Fault Zone.				
ii) Strong seismic ground shaking?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project design did not comply with building code requirements intended to protect people from hazards associated with strong seismic ground shaking. Reference: 6(Seismic Hazard Map Los Angeles Quad.), 18(Thresholds E.1)				
Explanation: In general, the Los Angeles region is subject to the effects of seismic activity. The proposed Guard Shack will be constructed to comply with seismic building code requirements. No other structures are proposed that would need to comply with seismic building codes.				
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project would be located in an area identified as having a high risk of liquefaction and appropriate design measures required within such designated areas were not incorporated into the project. Reference: 6 (Seismic Hazard Map Los Angeles Quad.), 18 (Thresholds E.1)				
Explanation: The project site is not in an area identified as being susceptible to liquefaction. The nearest mapped are with a liquefaction issue is approximately 600-feet to the southwest. The proposed project would not create any new				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
impacts related to liquefaction beyond those that already exist.				
iv) Landslides?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located in a hillside area with soil conditions that would suggest high potential for sliding and appropriate design measures were not implemented. Reference: 6 (Seismic Hazard Map Los Angeles Quad.), 18(Thresholds E.1), 26 (NavigateLA)				
Explanation: The majoring of the project site is not located in an area identified as being susceptible to landslides. There is a small area located on property at 5515 and 5555 E Valley Boulevard that is mapped as being in a landslide area. However, no development activities are planned to be accomplished in that area.				
a) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were to expose large areas to the erosion effects of wind or water for a prolonged period of time. Reference: 18 (Thresholds E.2)				
Explanation: The great majority of the project is covered in hard surfaces (i.e., buildings, off-street parking areas, streets, sidewalks, etc.) A small portion of the project is covered in mature landscaping. Construction activities (i.e., Minimum Turning Area, sidewalks, Guard Shack, security fencing, etc.) could result in ground surface disruption, during grading and excavation. These activities could result in potential erosion at the proposed project site. However, soil exposure would be temporary and short-term and applicable Department of Building and Safety erosion control techniques would limit potential erosion. All future construction would need to comply with Best Management Practices to prevent erosion or loss of topsoil.				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were built in an unstable area proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Reference: 6(Seismic Hazard Map Los Angeles Quad.), 18(Thresholds E.2)				
Explanation: See 6 (a) (iii) and (iv) above.				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
Standard:				
Explanation: The proposed project is in an area identified as having an Altamont Clay				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
Loam soil type. The Altamont series consists of deep, well drained soils that formed in material weathered from fine-grained sandstone and shale. These soils are on gently sloping to very steep uplands. The average annual precipitation is about 17 inches and the mean annual temperature is about 59 degrees F. Prior to any construction and as a standard practice, a geotechnical evaluation would be prepared which would prescribe methods, techniques, and specifications for: site preparation, treatment of undocumented fill and/or alluvial soils, fill placement on sloping ground, fill characteristics, fill placement and compactions, temporary excavations and shoring, permanent slopes, treatment of expansive soils, and treatment of corrosive soils. Design and construction of the proposed project would conform to recommendations in the geotechnical evaluation; therefore, impacts from potentially expansive soil would not be significant. Reference: 18(Thresholds E.2), 30 (Diblee)				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
Comment: A significant impact may occur if the proposed project were built on soils that were incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system, and such a system was proposed. Reference: 18(Thresholds E.3)				
Explanation: The project area is served by the City's wastewater collection, conveyance, and treatment systems. No septic systems are proposed for installation. Reference: 26 (NavigateLA wye map)				
7. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project would generate greenhouse gas (GHG) emissions that would have a significant impact on the environment.				
Explanation: The project is expected to generate approximately 1.18% of the maximum allowable greenhouse gases, this not a significant level.				
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.				

Issues	Potentially Significant Impact	Less Than Significant With [illegible]	Less Than Significant	No Impact
Explanation: The proposed project would also not generate GHG emissions that would have a significant impact on the environment. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation for the purpose of reducing GHG emissions. The impact would be less than significant.				
8. 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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project involved the use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions. Reference: 18(Thresholds F.1, F.2)				
Explanation: The proposed project does not involve the use, transport, or disposal of any hazardous materials. Any development would comply with applicable laws and regulations for use, transport, or disposal of hazardous materials.				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project involved a risk of accidental explosion or utilized substantial amounts of hazardous materials as part of its routine operations that could potentially pose a hazard to the public under accident or upset conditions. Reference: 15(Geotracker), 16(LAMC), 18(Thresholds F.1, F.2), 33(USGS Los Angeles Quad)				
Explanation: The proposed project does not involve the use, transport, or disposal of any hazardous materials. Refer to discussion under 7 (a) above.				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located within one-quarter mile of an existing or proposed school site and were projected to release toxic emissions which pose a hazard beyond regulatory thresholds. Reference: 18(Thresholds F.2)				
Explanation: There is no school within one quarter mile of the project site. The proposed project will not contain hazardous or acutely hazardous materials, substances, or waste. Construction and operation of the project will not involve substantial quantities of hazardous or acutely hazardous materials, substances, or waste. Reference: 15(Geotracker), 13(Envirostor), 26(NavigateLA Schools)				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
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?	☐	☐	☐	☒
Reference: 18(Thresholds F.2)				
Comment: The project site is not listed in the State Water Resources Control Board Geotracker system which includes leaking underground fuel tank sites and Spills, Leaks, Investigations, and Cleanups sites; or the Department of Toxic Substances Control Envirostor Data Management System which includes CORTESE sites, or the Environmental Protection Agency's database of regulated facilities. Reference: 15(Geotracker), 13(Envirostor),				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project site were located within a public airport land use plan area, or within two miles of a public airport, and would create a safety hazard. Reference: 18(Thresholds F.1, K.2)				
Explanation: The project is not located within a public airport land use plan area, or within two miles of a public airport, and would not create a safety hazard. Reference: 20(ZIMAS), 15(Geotracker), 13(Envirostor), 26(NavigateLA)				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the project would result in a safety hazard for people residing or working in the project area because of its location near a private airstrip. Reference: 18(Thresholds F.1, K.2)				
Explanation: No private airstrip is located within the vicinity of the project site. Reference: 26(NavigateLA)				
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were to substantially interfere with roadway operations used in conjunction with an emergency response plan or evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such plan. Reference: 18(Thresholds F.1, K.2)				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Explanation: The proposed project would not alter the adjacent street system, other than the partial vacation of Mariondale Avenue and full vacation of Lillyvale Avenue. The construction of the new security fence, to include an entry and exit gates will include infrastructure to permit access to the property by the Los Angeles Fire Department as needed to respond to requests for service, if the gate is not being manned at the time of their arrival at the gate.				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located in a wild land area and poses a significant fire hazard, which could affect persons or structures in the area in the event of a fire. Reference: 18(Thresholds K.2)				
Explanation: The project site is not located within a wild land or a very high fire hazard severity zone. 26(NavigateLA Very High Fire Hazard Severity Zone)				
9. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project discharged water which did not meet the quality standards of agencies which regulate surface water quality and water discharge into storm-water drainage systems. Reference: 18(Thresholds G.2)				
Explanation: The proposed project will comply with applicable storm water management requirements for pollution prevention (for example, compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts).				
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)?	☐	☐	☐	☒
Standard: A project would normally have a significant impact on groundwater supplies if it were to result in a demonstrable and sustained reduction of groundwater recharge capacity or change the potable water levels sufficiently that it would reduce the ability of a water utility to use the groundwater basin for public water supplies or storage of imported water, reduce the yields of adjacent wells or				

Issues	Potentially Significant Impact	Less Than Significant With [illegible]	Less Than Significant	No Impact
well fields, or adversely change the rate or direction of groundwater flow. Reference: 18(Thresholds G.2, G.3)				
Explanation: The proposed project would not utilize existing groundwater resources nor would it interfere with groundwater recharge. Changes to the groundwater supply are not anticipated as a result of the proposed project.				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project resulted in a substantial alteration of drainage patterns that resulted in a substantial increase in erosion or siltation during construction or operation of the project. Reference: 18(Thresholds G.1, G.2)				
Explanation: The proposed project would not alter the existing drainage pattern of the site or area. No streams or rivers cross the proposed project route. The project would not substantially alter the existing drainage pattern of the site or area. As discussed in comment 8 (a), the project would result in temporary soil disturbance activities during construction during which time a storm water pollution prevention plan for the control of soil erosion and sediment runoff would be implemented. The project would be constructed in accordance with applicable requirements of the municipal code, including grading requirements.				
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 that would result in flooding on- or off-site?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project resulted in increased runoff volumes during construction or operation of the proposed project that would result in flooding conditions affecting the project site or nearby properties. Reference: 18(Thresholds G.1)				
Explanation: The proposed project would not alter the existing drainage pattern of the site or area. See comments for 8 (a) and 8 (c) above.				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the volume of runoff were to increase to a level which exceeded the capacity of the storm drain system serving a project site. A significant impact may also occur if the proposed project would substantially				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
increase the probability that polluted runoff would reach the storm drain system. Reference: 18(Thresholds G.2)				
Explanation: The proposed project would not change the volume of storm water runoff. See comment 8(a) above.				
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
Comment: A significant impact may occur if a project included potential sources of water pollutants and potential to substantially degrade water quality. Reference: 18(Thresholds G.3)				
No potential sources of water quality degradation are anticipated.				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project placed housing within a 100-year flood zone. Reference: 18(Thresholds G.1 to G.4)				
Explanation: The proposed project does not include housing.				
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located within a 100-year flood zone and would impede or redirect flood flows. Reference: 18(Thresholds G.4)				
Explanation: The project site is not located within a 100-year flood zone. Reference: 34(FIRM Panel 060137 0067 C), 26(NavigateLA Flood Plains)				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located in an area where a dam or levee could fail, exposing people or structures to significant risk of loss, injury or death. Reference: 18(Thresholds E.1, G.3)				
Explanation: The project site is not located in an area subject to this risk. Reference: 26(NavigateLA Inundation Areas)				
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located in an area with inundation potential due to seiche, tsunami, or mudflow. Reference: 18(Thresholds E.1)				
Explanation: The project site is not located in an area subject to this risk. Reference: 26(NavigateLA Tsunami Area and Landslides)				
10. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
Standard: A significant impact may occur if the proposed project were sufficiently large or otherwise configured in such a way as to create a physical barrier within an established community. Reference: 18(Thresholds H.2)				
Explanation: The proposed project would not introduce a physical barrier.				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were inconsistent with the General Plan, or other applicable plan, or with the site's zoning if designated to avoid or mitigate a significant potential environmental impact. Reference: 18(Thresholds H.1, H.2)				
Explanation: See discussion in Section IV J. Reference: 20(ZIMAS), 18(General Plan)				
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located within an area governed by a habitat conservation plan or natural community conservation plan and would conflict with such plan. Reference: 18(Thresholds H.1, H.2)				
Explanation: See discussion under 4(f) above.				
11. 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?	☐	☐	☐	☒
Standard: A significant impact may occur if the project were located in an area used or available for extraction of a regionally important mineral resource, if the project converted an existing or potential present or future regionally-important mineral extraction use to another use, or if a project affected access to such a site. Reference: 18(General Plan), 18(Thresholds E.4)				
Explanation: The project site is not located within an area that contains known mineral resources.				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if a project were located in an area used or available for extraction of a locally-important mineral resource and the project converted such a resource to another use or affected access to such a site.				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
Reference: 18(General Plan), 18(Thresholds E.4)				
Explanation: The project site is not located within an area that contains known mineral resources.				
12. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
Standard: A significant impact may occur if the project generated noise levels exceeding the standards for ambient noise as established by the General Plan and Municipal Code or exposed persons to that increased level of noise. Reference: 18 (General Plan Noise Element), 18(Thresholds Section I)				
Explanation: The proposed project would likely result in temporary higher-than-average noise levels in the local community during construction of the security fencing, Guard Shack, and road improvements. The project will comply with the LAMC *Noise Ordinance* and given that the proposed project would be implemented in accordance with this ordinance, significant adverse impacts to noise levels are not expected.				
b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
Standard: A significant impact may occur if the project were to expose persons to or generate excessive ground-borne vibration or ground-borne noise levels. Reference: 18 (General Plan Noise Element), 18(Thresholds Section I)				
Explanation: Construction activities associated with the project could generate low levels of ground-borne vibration from use of heavy equipment. These effects would be temporary and short-term in nature and would comply with applicable noise/vibration standards. See also comment under Section 11(a).				
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
Standard: A significant impact may occur if the project were to substantially and permanently increase the ambient noise levels in the project vicinity above levels existing without the proposed project. Reference: 18 (General Plan Noise Element), 18(Thresholds Section I)				
Explanation: Refer to discussion under 11 (a) above.				
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
Comment: A significant impact may occur if the project were to create a substantial				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
temporary or periodic increase in the ambient noise levels in the project vicinity above levels existing without the proposed project. Reference: 18 (General Plan Noise Element), 18(Thresholds Section I)				
Explanation: Refer to discussion under 11 (a) above.				
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?	☐	☐	☐	☒
Standard: Reference: 18(Thresholds Section I), 26(NavigateLA)				
Explanation: The project is not located within two miles of an airport.				
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?	☐	☐	☐	☒
Standard: Reference: 18(Thresholds Section I), 26(NavigateLA)				
Explanation: No private airstrips are located within the vicinity of the project area.				
13. 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)?	☐	☐	☐	☒
Standard: A significant impact may occur if population growth is induced in an area, either directly or indirectly, such that the population of the area may exceed the planned population of that area. Reference: 18(Thresholds Section J.1)				
Explanation: Population density is managed by the City's land use and planning designations (see above) and building codes. The proposed project will not involve changing the City's land use and planning designations to a more intense use and therefore will not induce substantial population growth.				
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
Standard: Normally, there would be no significant impact if the project will not result in a net loss of 15 single-family dwellings or 25 dwellings in multi-family housing. Reference: 18(Thresholds J.1 and J.2)				
Explanation: The proposed project will not displace any housing.				
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
Standard: Normally, there would be no significant impact if the project will not result in a net loss of 15 single-family dwellings or 25 dwellings in multi-family housing.				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
Reference: 18(Thresholds J.2)				
Explanation: The proposed project will not displace any housing.				
14. PUBLIC SERVICES –				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
Standard: A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the proposed project based on response time, access, or fire hydrant/water availability. Reference: 18(Thresholds K.2)				
Explanation: The proposed project would be constructed in accordance with all applicable fire codes set forth by the state Fire Marshall and LAFD. Therefore, the proposed project would not be considered a fire hazard and would not exceed the capacity of the LAFD to serve the site or other areas with existing fire protection services. The nearest local fire responders would be notified, as appropriate, of traffic control plans during construction so as to coordinate emergency response routing during construction work.				
ii) Police protection?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project were to result in an increase in demand for police services that would exceed the capacity of the police department responsible for serving the site. Reference: 18(Thresholds K.1)				
Explanation: The proposed project would not require additional police protection beyond what is currently provided. The nearest local police station would be notified, as appropriate, of traffic control plans during construction so as to coordinate emergency response routing during construction work.				
iii) Schools?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project includes substantial employment or population growth that could generate demand for school facilities that exceeded the capacity of the school district responsible for serving the project site. Reference: 18(Thresholds K.3)				
Explanation: The proposed project is not a growth inducing project, either directly or indirectly, and would therefore not increase the demand for schools in the area				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
iv) Parks?	☐	☐	☐	☒
Standard: A significant impact may occur if the recreation and park services available could not accommodate the population increase resulting from the implementation of the proposed project. Reference: 18(Thresholds K.4)				
Explanation: The proposed project will not cause a population increase. (see Item 13 above)				
v) Other public facilities?	☐	☐	☐	☒
Standard: Projects that do not result in a net increase of 75 residential units normally would not have a significant impact on public libraries. Reference: 18(Thresholds K.5)				
Explanation: The project will not cause an increase in residential units.				
15. RECREATION –				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project includes substantial employment or population growth that may generate demand for public park facilities that exceed the capacity of existing parks. Reference: 18(Thresholds K.4)				
Explanation: The proposed project will not cause a substantial employment increase. There should be no major change in the numbers of employees at the site or providing security at the site. (see Item 13 above)				
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒
Standard: A significant impact would occur if the proposed project required the construction or expansion of recreational facilities that would have an adverse physical effect on the environment. Reference: 18(Thresholds K.4)				
Explanation: The proposed project will not require the construction or expansion of recreational facilities.				
16. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but	☐	☐	☒	☐

Issues	Potentially Significant Impact	Less Than Significant With [illegible]	Less Than Significant	No Impact
not limited to intersection, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				
Standard: A significant impact may occur if the proposed project causes an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. Reference: 18(Thresholds L.1 to L.4, L.8)				
Explanation: Traffic may be affected temporarily due to construction activities near Mariondale Avenue and Valley Boulevard and where the Minimum Turning Area is being constructed. Other than the Guard Shack, no construction is proposed that would result in a substantial increase in traffic. Once construction is complete, the project would not cause increased traffic flow, the level of traffic into and out of the Upper Campus will remain generally the same.				
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project causes a conflict with an applicable congestion management program. Reference: 18(Thresholds L.1 to L3)				
Comment: The proposed project will not cause a substantial traffic increase, as no new buildings, except the Guard Shack will be constructed. As such the project will not create a conflict with any applicable congestion management plan.				
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project changed air traffic patterns, including either an increase in traffic levels or a change in location the resulted in substantial safety risks.				
Explanation: There would be no impact to air traffic patterns.				
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project substantially increased road hazards due to a design feature or incompatible uses. Reference: 18(Thresholds L.5)				
Explanation: The project is compatible with the land use and would not include any design features that would result in a safety hazard to pedestrians, personnel,				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
visitors, or nearby neighbors. The proposed Minimum Turning Area will permit the traveling public to turn around and drive back down Mariondale Avenue.				
e) Result in inadequate emergency access?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project resulted in inadequate emergency access. Reference: 18(Thresholds L.5, L.8, and J2)				
Explanation: The construction of the new security fence, to include an access gate will include infrastructure to permit access to the property by the LAFD and LAPD as needed to respond to requests for service, if the gate is not being manned at the time of their arrival at the gate.				
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project conflicts with adopted policies, plans, or programs supporting alternative transportation. Reference 18(Thresholds L.6)				
Explanation: The proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation.				
17. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project exceeds wastewater treatment requirements of the local regulatory governing agency. Reference: 18(Thresholds M.2)				
Explanation: The proposed project would not generate additional wastewater.				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project resulted in the need for new construction or expansion of water or wastewater treatment facilities that could result in an adverse environmental effect that could not be mitigated. Reference: 18(Thresholds G.1, M.1 and M.2)				
Explanation: The proposed project would not use additional water or generate additional wastewater that would exceed existing capacity.				
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
Standard: A significant impact may occur if the volume of storm water runoff from the proposed project increases to a level exceeding the capacity of the storm drain system serving the project site. Reference: 18(Thresholds G.1 and M.2)				
Explanation: The storm water facilities in the area are adequate to serve the proposed project. The proposed project would not increase the volume of storm water runoff.				
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project's water demands would exceed the existing water supplies that serve the site. Reference: 18(Thresholds M.1)				
Explanation: The City of Los Angeles Department of Water and Power provides potable water to the project area and vicinity. Other than temporary construction water use, the proposed project would not include new water uses.				
e) Result in a determination by the wastewater treatment provider that 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?	☐	☐	☐	☒
Comment: A significant impact may occur if the proposed project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. Reference:				
Explanation: The City of Los Angeles Bureau of Sanitation provides sanitation facilities in the area, and they are adequate to serve the proposed project. The proposed project would not increase the volume of sewage generated at the project site. See 17 (a) above.				
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
Comment: A significant impact may occur if the proposed project were to increase solid waste generation to a degree that existing and projected landfill capacities would be insufficient to accommodate the additional waste. Reference: 18(Thresholds M.3), 29(Countywide Siting Report)				
Explanation: City standard for public works require demolition debris to be recycled where feasible; therefore, impacts associated with construction debris would be less than significant. After construction, the project will not generate substantial amounts of solid waste.				
g) Comply with federal, state, and local statutes and	☐	☐	☐	☒

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
regulations related to solid waste?				
Comment: A significant impact may occur if the proposed project would generate solid waste that was in excess of or was not disposed of in accordance with applicable regulations. Reference: 18(Thresholds M.3), 29(Countywide Siting Report)				
Explanation: The project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards				
18. MANDATORY FINDINGS OF SIGNIFICANCE --				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
Comment: No plant or animal species listed on any state or federal lists for endangered, threatened or special status species are expected to be found on the project site due to the lack of suitable habitat. There are no known cultural resources are expected to be found on the project site.				
Reference: Preceding analyses				
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☐	☒

Issues	Potentially Significant Impact	Less Than Significant With [illegible]	Less Than Significant	No Impact
Comment: There are eight (8) existing projects underway or proposed projects within the overall project area. These projects have been previously evaluated and approved by another City Agency. These projects would be allowed to continue, with or without the vacation being approved. Project-level traffic impacts during construction were less than significant. Therefore, no mitigation measures are required. As a result, construction of the project would not result in a cumulative considerable contribution to a significant cumulative traffic impact to construction. Operation of the proposed project would not result in significant impacts because the proposed project would not generate substantial new measurable and regular vehicle trips during the operations period, and long-term mitigation measures are therefore not required. Based on the above, significant cumulative impacts from related-projects are not anticipated in any of the impact categories. The proposed project is consistent with local and regional land use, air quality, water quality, and transportation plans. In addition, the proposed project is not expected to make a cumulatively considerable contribution to a significant cumulative impact. The impact is anticipated to be less than significant.				
Reference: Preceding analyses				
c) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?	☐	☐	☐	☒
Comment: The overall purpose for the proposed project is to create two private streets, relocate the Corporate entrance to the Upper Campus for security reasons, and to create efficiency of goods movement within the project site. Construction activities within the project area includes: Construction of a new security fence around the Guard Shack; construction of an enclosed Guard Shack near the main entrance off of Mariondale Avenue; and construct a standard Minimum Turning Area with a radius of 35-feet and 8-foot minimum sidewalk width. No impact is anticipated.				
Reference: Preceding analyses				