

4. OTHER CEQA CONSIDERATIONS

Section 15126 of the CEQA Guidelines requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development and operation. As part of this analysis, the EIR must also identify cumulative impacts, significant environmental effects of the proposed project, significant environmental effects that cannot be avoided if the proposed project is implemented, significant irreversible environmental changes that would result from implementation of the proposed project and growth-inducing impacts of the proposed project.

4.1. SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level. Sections 3.1 through 3.6 of this Draft EIR provide a comprehensive identification of environmental effects, including the level of significance both before and after mitigation. The proposed project would not result in significant and unavoidable impacts.

4.2. LONG-TERM EFFECTS AND IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irreversible commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Resources that will be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient or wasteful use of resources. In addition, construction activities related to the proposed project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment.

With respect to operational activities, compliance with mandatory CALGreen requirements, all applicable building codes, as well as meeting LEED Silver Certification requirements, would ensure that all natural resources are conserved or recycled to the maximum extent feasible. Relevant energy conservation plans, policies, and regulations adopted by Metro include the project-specific sustainability plan, Climate Action and Adaptation Plan, the Energy Conservation and Management Plan and the Green Construction Policy. Refer to Section 3.2 Greenhouse Gas Emissions, for a detailed discussion of these policies, including renewable energy policies that aim to avoid unnecessary expenditure of natural resources and to prolong the useful life of fossil fuels by using resources more efficiently. Metro's Energy and Sustainability policy for instance, requires that all building or structures over 10,000 square feet be constructed to achieve LEED Silver Certification, at a minimum (Metro, 2007). The Energy and Sustainability policy also includes a comprehensive overview of site stormwater and landscape strategies to reduce runoff and improve water quality that drains into the Ballona Creek watershed and the Pacific Ocean. The landscape would also assist in reducing urban heat island effects through the use of high albedo materials, which would improve the local microclimate and pedestrian comfort. The design would focus on reductions in potable water demand for the building and landscape, as well as reductions in wastewater (e.g., increased use of recycled water and wastewater reductions). Refer to Subsection 4.4.12 for a detailed discussion of potential energy impacts in accordance with Appendix F of the CEQA Guidelines.

The proposed project would not involve wasteful or unjustifiable use of energy or other resources, and energy conservation efforts could also occur with new construction. In addition, new development associated with the proposed project would be constructed and operated in accordance with specifications contained in Title 24 of the California Code of Regulations. The following measures, many of which overlap with LEED credit requirements, are project requirements to demonstrate compliance with the CALGreen:

- Site Stormwater Best Management Practices
- Light Pollution Reduction
- Hardscape Alternatives (Heat Island Effect Reduction)
- Solar Ready Building
- Wastewater Reduction by 20 Percent Minimum
- Outdoor Water Use Reduction and Metering
- Recycling and Reuse of Excavated Soil and Land-Clearing Debris
- Recycling Facilities

- Indoor Air Quality during Construction
- Environmental Tobacco Smoke Control
- Refrigerant Piping Accessibility

The proposed project would embody the principles of Metro's Sustainability policy such as energy conservation initiatives, implementation of sustainability elements into project design, and achieve a LEED Silver Certification. Therefore, the use of energy on-site would occur in an efficient manner.

4.3. GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that growth inducing impacts of a proposed project be considered. Growth inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The proposed project would not provide housing and would not substantially increase employment.

With regard to infrastructure-induced population growth, improvements planned for the proposed project, or as mitigation, are intended to provide for better circulation flows throughout the area or to improve pedestrian and bike safety and would not open any large undeveloped areas for new use. The overall intention of the proposed project is to satisfy existing and future transit demand in the airport vicinity. Utility and other infrastructure upgrades are also intended to meet project-related demand. The proposed project's demand for commercial goods and services would be met by new kiosk retail, services and community facilities and by existing retail, service and other resources already located within proximity to the project site. In conclusion, the proposed project would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure and reduce regional congestion, and as a result the proposed project, would not induce unanticipated growth and development.

4.4. EFFECTS DETERMINED NOT TO BE SIGNIFICANT

The proposed project was determined to have no impact or a less-than-significant impact in the following resource areas. Each resource area was assessed using Appendix G of the CEQA Guidelines.

4.4.1. Aesthetics

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

A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. Diminishment of a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected. The project site is not part of a scenic vista, nor is the project site within the sightline of a scenic vista. The project area is urbanized and the visual setting is characterized by light industrial land uses and parking lots. The site and surrounding area consists of a combination of commercial, industrial, parking, institutional, multi-family residential and LAX with airport-related land uses. Available views are dominated by modern mid-rise hotels, lit and brightly colored signage, landscaping, concrete intersection bridges, directional signs and construction activities. The proposed project would not block views of or have an adverse effect on a scenic vista. Therefore, no impact would occur.

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

No designated state scenic highways are located on or adjacent to the project site. The closest state designated scenic highway is State Route-2, Angeles Crest Highway, approximately 20 miles to the northeast (California Scenic Highway, 2016). The proposed project would not damage a scenic resource (i.e., trees, rock outcroppings or historic buildings) within the viewshed of a state scenic highway. Therefore, no impact would occur.

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

The project site is located within an urban area and is currently developed with rental car facilities, a CNG fueling station and a towing storage yard. The project area consists of a combination of commercial, industrial, parking, institutional, multi-family residential and LAX with airport-related land uses. The visual setting of the area north of the project site is largely characterized by industrial uses such as rental car and manufacturing facilities. Century Boulevard, located to the south of the project site, represents a commercial corridor that is primarily occupied by a mix of commercial uses including: restaurants, hotels, rental car facilities and gas stations. Metro's maintenance facility (currently under construction), a truck rental company and parking uses characterize views to the west. Manchester Square occupies the area east of the project site and is situated between Aviation and La Cienega Boulevards to the west and east respectively and between Arbor Vitae and 98th Streets to the north and south. It currently includes vacant lots, a school and multi-family residences. Landscaping along Aviation Boulevard is extremely limited. As the Aviation Boulevard corridor is dominated by expansive paved areas and transportation infrastructure such as LAX land uses, train tracks, the Green Line alignment, it lacks visual cohesion and the visual quality around the project site is

considered low. The proposed project is a transportation center which would be consistent with the visual character of the surrounding area. In addition, the proposed project's transit infrastructure would add visual coherence to the existing transportation-oriented aesthetic using an integrative approach that is compatible with existing and future development. Improvements such as landscaping, benches, and public art are also proposed to create an enhanced, pedestrian-friendly environment within the project site. Therefore, no impact would occur.

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

Light impacts are typically associated with the use of artificial light during the evening and night-time hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily related to bright point-source lighting that contrasts with existing low ambient light conditions.

Due to the urbanized nature of the area, a moderate level of ambient nighttime light already exists. Nighttime lighting sources include street lights, vehicle headlights, and interior, exterior building illumination and LAX to the south of the project site. LAX is a significant source of light in the area to ensure aircraft safety.

Construction lighting would not create a new source of substantial light or glare as several nighttime lighting sources already exist on and around the project site (e.g., streetlights, building illumination, LAX). Construction activities would primarily occur during daytime hours and construction-related illumination would be temporary and limited to safety and security purposes. To the extent construction requires artificial light; lighting would be shielded and/or aimed towards the project site and away from potentially light-sensitive uses. Construction lighting would not be significant due to the project site's location and the temporary nature of construction lighting. Therefore, no impact would occur.

During operation, the proposed project would also be well lit to ensure a safe environment and to provide wayfinding for buses and passengers, including lighting at entryways, the bus circulation roadways, sidewalks, and common areas. The proposed project includes several elements (such as glass surfaces) or features that could create new sources of glare. Screening enveloping the glass surfaces would minimize glare. Regarding residences located to the east across Aviation Boulevard, the project site would be lit to similar levels as existing conditions, which includes a well-lit parking lot. It is not anticipated that residential uses would be exposed to significant increases in nighttime light. Therefore, no impact would occur.

4.4.2. Agricultural and Forestry Resources

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

According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS), the project site is currently zoned as M1-1 Limited Industrial (City of Los Angeles, 2016). It is not designated as Prime Farmland, Unique Farmland or farmland of Statewide Importance (California Department of Conservation, 2016). Project implementation would not convert farmland to non-agricultural use. Therefore, no impact would occur.

- b) **Would the proposed project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

According to the ZIMAS, the project site is located within the City of Los Angeles and is not zoned for agricultural use (City of Los Angeles, 2016). The areas immediately surrounding the site are zoned as follows: the area to the north across Arbor Vitae Street is zoned M-1 Light Manufacturing; the area to the east is primarily zoned as LAX with pockets of C2-1 Commercial Zone; to the south, there are pockets of C2-2, LAX, and M2-1 Zoning; and the area to the west is zoned as M2-1 Light Industrial, abutting the City of Inglewood. The project site and surrounding area is not zoned for agricultural use. Neither the project site nor nearby lands are enrolled under the Williamson Act Contract. Project implementation would not conflict with existing zoning for agricultural use nor a Williamson Act Contract. Therefore, no impact would occur.

- c) **Would the proposed project conflict with existing zoning for, or cause rezoning of, forest land (as defined in 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))?**

The project site is located within the City of Los Angeles and is not zoned for forest land according to ZIMAS (City of Los Angeles, 2016). Project implementation would not conflict with existing zoning for, or cause rezoning of, forestland, timberland or timberland zoned Timberland Production. Therefore, no impact would occur.

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

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

- e) Would the proposed project involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use?**

There is no farmland or forest land located on the project site or in its immediate vicinity. The project site is located within an urbanized, industrial area. The proposed project would not involve changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use. Therefore, no impact would occur.

4.4.3. Biological Resources

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

The project site is fully developed and located within an urbanized area that has been previously disturbed and heavily affected by past activities. There are a number of ornamental trees on the project site, none of which have been identified by the City of Los Angeles as protected species (i.e., native Oak tree species, California Sycamore, California Bay or California Black Walnut).

Sparse landscaping along the perimeter of the site consists of approximately 11 city-owned ornamental trees in the surrounding street right-of-ways. These trees will be required to be removed as part of the proposed project, although the City of Los Angeles requires that all street trees be replaced on a 2:1 basis. Replacement will occur in consultation with the City of Los Angeles Department of Public Works Bureau of Street Services (Urban Forestry Division, 2014). Although unlikely, due to the ornamental nature of onsite landscaping, the project site's existing industrial development in an urban setting, and lack of connectivity to open space or parklands, the existing trees could potentially provide nesting sites for migratory birds. Construction activities that involve tree removal would be timed as much as possible to occur outside the migratory bird nesting season to ensure compliance with the Migratory Bird Treaty Act (MBTA). Metro's past practices required the survey of potential nesting sites if construction commenced during nesting season (March through August). As part of Metro's construction specifications, such surveys are required to be completed by a qualified biologist during the construction process. Identified nests would be protected in place to ensure compliance with all applicable laws and regulations, including the MBTA and California Fish and Wildlife Code's Protection of birds' nests (Section 3503, and 3503.5) and (Section 3513) Taking Migratory Bird Treaty Act. Therefore, with compliance with Metro's construction specifications and the existing regulatory requirements, impacts would be less than significant.

The site is not identified as critical habitat for threatened and endangered species and does not contain any candidate, sensitive or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Wildlife or the

U.S. Fish and Wildlife Service. In addition, the project site is not located within an existing or proposed Significant Ecological Area, as designated by the County of Los Angeles. Resources reviewed in this analysis included U.S. Fish and Wildlife Service Critical Habitat for Threatened & Endangered Species (Fish and Wildlife Service, 2016) and the County of Los Angeles Significant Ecological Areas and Coastal Resource Areas Policy Map (SEA Program, 2015). Therefore, no impact would occur.

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

The project site is occupied by industrial uses near LAX in an urbanized expanse that has been previously disturbed by past activities; it is not located near water sources (e.g., river or stream) that could support riparian habitat. A review of local and regional plans determined that no riparian habitats or sensitive natural communities are located on-site or in the adjacent surrounding area, nor have they been identified in City or regional plans, policies, or regulations of the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or the County of Los Angeles (Fish and Wildlife Service, 2016; SEA Program, 2015). Therefore, no impact would occur.

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

There are no federally protected waters or wetlands, as defined by Section 404 of the Clean Water Act on the proposed project or in the vicinity. Therefore, no impact would occur.

d) Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The project site is occupied by industrial uses near LAX in an urbanized expanse that has been previously disturbed by past activities and does not provide wilderness habitats. A review of local and regional plans determined that there are no native resident, migratory fish, or wildlife species or established native resident or migratory wildlife corridors on-site or within the project area, nor would the proposed project impede any use of native wildlife nursery sites (Fish and Wildlife Service, 2016; SEA Program, 2015). However, as discussed above, the proposed project would remove some of the existing trees on the project site. Although unlikely, the existing trees could potentially provide nesting sites for migratory birds. As discussed above, regulatory and standard construction specifications would eliminate potential impacts. Therefore, with compliance with the existing regulatory requirements, impacts would be less than significant.

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

Sparse landscaping along the perimeter of the site consists of some ornamental trees and grasses in the surrounding City-owned right-of-ways. Approximately 11 city-owned ornamental trees would be removed and replaced on a 2:1 basis per City regulations. Replacement will occur in consultation with the City of Los Angeles Department of Public Works Bureau of Street Services (Urban Forestry Division, 2014). The project site does not contain locally-protected biological resources, such as oak trees, Southern California black walnut, western sycamore and California bay trees. Therefore, no impact would occur.

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

According to the California Regional Conservation Plans Map (CDFW, 2015) the proposed project is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur.

4.4.4. Cultural Resources

a) Would the proposed project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Section 15064.5 of the CEQA Guidelines generally defines historical significance as any object, building, structure, site, area, place, record or manuscript determined to be historically significant or significant in the architectural or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. The project site is comprised of four parcels totaling 9.53 acres (415,127 square feet). These parcels are developed with a total of roughly 12,330 square feet of industrial, commercial, parking and utility uses. There are three modern structures that were constructed between 1993 and 2012. A fourth structure on the project site was constructed between 1950 and 1960. None of the existing structures on the project site appear on listings, databases or sources identifying historical resources, including the National Register of Historic Places, California Register of Historical Resources, California Historical Landmarks, California Points of Historical Interest, Los Angeles Historic-Cultural Monument Report for the Westchester-Playa del Rey Community Plan and the City's Historic Preservation Overlay Zone Map (National Park Service, 2016; California Office of Historic Preservation, 2016; City of Los Angeles, 2016; City of Los Angeles, 2014).

AB 52 (effective July 2015) established a consultation process with all California Native American Tribes on the Native American Heritage Commission List, which includes a provision that requires that a lead agency provide written notification within 14 days of a decision to undertake a project or determination that a project application is complete to the listed tribes that requested notification. If requested by a California Native American Tribe, lead agencies must begin consultation prior to the release of a ND, MND or DEIR. The CEQA Guidelines have not yet been updated to reflect the statues of AB 52, and the Notice of Preparation for the proposed project was published in February 2015 prior to AB 52 becoming effective. Nonetheless, as part of the early consultation process, NOPs were mailed to the Native American Heritage Commission, the Los Angeles City/County Native American Indian Commission, and the Gabrielino-Tongva Tribe representative. No comments or requests for further notification or consultation were received by Metro in response to the NOP for the proposed project.

In addition, the proposed project is within the Area of Potential Effects (APE) of the Crenshaw/LAX Transit Corridor Project, which included a survey of the project site. As defined in the Section 106 of the National Historic Preservation Act, the APE means “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties” (U.S.C, 2014). The closest eligible historic resource is the Merle Norman Cosmetics headquarters at 9030 and 9130 Bellanca Avenue, located approximately 200 feet to the northwest of the project site. The APE of the Crenshaw/LAX Transit Corridor Project did not identify any historic resources on the project site (Metro, 2011). Therefore, no impact would occur.

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

The project site was included in the Crenshaw/LAX Transit Corridor EIR/EIS vertical APE, which extends from existing ground surface to approximately 25 feet above the and approximately 80 feet below the ground surface. No known archaeological resources listed in or eligible for listing in the NRHP would be affected by the proposed project. Furthermore, excavation would occur on the previously disturbed project site and reach average depths of one to two feet. However, construction personnel shall be informed of the potential for encountering significant archaeological and paleontological resources and of the need to stop work on the project site until a qualified archaeologist or paleontologist has assessed the significance of the find and implement appropriate measures to protect or scientifically remove the find. Regardless, the potential exists that archaeological resources may be encountered during site preparation, as various archeological features have been discovered during construction of the Crenshaw/LAX Transit Corridor. Since any unknown resources could be altered or destroyed by site excavation or other construction activities, discovery of archaeological resources during construction shall be treated in accordance with applicable federal, state and local guidelines. In the event that human remains are discovered, there cannot be disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code

Section 5097.98. These code provisions require notification of the County Coroner and the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. These laws would ensure that the proposed project would not significantly impact archaeological resources. Therefore, with compliance with the existing regulatory requirements, impacts would be less than significant.

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

A visual site survey and a review of aerial photographs confirmed that there are no geologic features on the project site. The potential exists that paleontological resources may be encountered during site preparation, which would include one to two feet of excavation for building foundation and footings. Since any unknown resources could be altered or destroyed by site excavation or other construction activities, discovery of paleontological resources during construction shall be treated in accordance with applicable federal, state and local guidelines, including those set forth in Public Resources Code Section 21083.2. If paleontological resources are discovered during excavation, grading, or construction, Metro would be notified immediately, and all work would cease in the area of the find until a qualified paleontologist evaluates the find. The paleontologist would determine the location, the time frame, and the extent to which any monitoring of earthmoving activities would be required. The found deposits would be treated in accordance with federal, state and local guidelines, including those set forth in Public Resources Code Section 21083.2. Compliance with the law would ensure that the proposed project would not significantly impact paleontological resources. Therefore, with compliance with the existing regulatory requirements, impacts would be less than significant.

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

No formal cemeteries, other places of human interment or burial grounds or sites are known to occur within the project area. There is always a possibility that human remains may be unexpectedly encountered during construction. There cannot be disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. These code provisions prohibit construction activity after the discovery of human remains until on any nearby area reasonably suspected to overlie adjacent remains until the County Coroner has determined that the remains are not subject to laws concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. These code provisions also require notification of the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains.

These laws would ensure that the proposed project would not significantly impact human remains. Therefore, with compliance with the existing regulatory requirements, impacts would be less than significant.

4.4.5. Geology and Soils

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

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

The Alquist-Priolo Earthquake Fault Zoning Act is intended to mitigate the hazard of surface fault rupture on structures for human occupancy. According to the California Department of Conservation's Regulatory Maps databases for the Venice Quadrangle, the project site is not within an Alquist-Priolo Fault Zone and there is no substantial evidence of another fault that could create surface rupture hazards at the project site (California Department of Conservation, 2015). The nearest known Alquist-Priolo Fault Zone is the Newport – Inglewood Fault Zone (onshore), located approximately two miles to the east of the project site (California Department of Conservation, 1986). In addition, the active Charnock Fault trends northwest-southeast within ¼-mile east of the project site (Metro, 2016(a)). As most surface faulting is confined to a relatively narrow zone ranging from a few feet to few tens of feet wide along the fault line, surface rupture due to seismic activity at the Newport – Inglewood Fault or the Charnock Fault is unlikely due to the project site's distance from the fault zone. Furthermore, the proposed project would be required to comply with the California Department of Conservation, Division of Mines and Geology Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety requirements in the Uniform Building Code (UBC) and the Los Angeles Municipal Code (LAMC). Therefore, no impact would occur.

- ii) Strong seismic ground shaking?*

The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Seismic activities associated with a number of nearby faults (e.g., Hollywood, Raymond, Verdugo, Newport - Inglewood, Santa Monica, Sierra Madre and San Andreas Faults), as well as blind thrust faults (e.g., Elysian Park, Puente Hills, and Compton), can generate seismic shaking. Consequently, development of the proposed project could expose people and structures to strong seismic ground shaking. However, the proposed project would be designed and constructed in accordance with state and local building codes to reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. The proposed project would be required to comply with the California Department of Conservation, Division of Mines and Geology Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California,

which provides guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety requirements in the UBC and the LAMC. Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable with current engineering practices. Therefore, with compliance with the existing regulatory requirements, impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle. According to the California Department of Conservation's Seismic Hazard Zones Map for the Venice Quadrangle, the project site is not located within an earthquake induced liquefaction zone (California Department of Conservation, 1999). In addition, groundwater under the project site is not shallow and has been measured at approximately 90 to 100 feet below ground surface (bgs). Therefore, no impact would occur.

iv) Landslides?

The project site and surrounding areas are fully developed and generally characterized by flat topography, and thus, would not be susceptible to landslides. The project site is not located within an earthquake-induced landslide area (California Department of Conservation, 1999; City of Los Angeles, 1990). Therefore, no impact would occur.

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

Construction of the proposed project would result in ground surface disturbance during site clearance, excavation and grading, which could create the potential for soil erosion to occur. Site preparation would require removal of all vegetation, any unsuitable fill, and asphalt and concrete paving, exposing pervious surfaces to wind and rainfall. Since the project site is primarily developed with impervious surfaces and industrial uses, topsoil is not expected to be present. However, the proposed project would require excavation of approximately 31,000 cubic yards of soil, of which approximately 15,500 cubic yards of soil would be exported due to contamination (Refer to Section 3.3 Hazards and Hazardous Materials). Construction activities would be performed in accordance with the requirements of the Los Angeles Building Code and the LARWQCB through the City's Stormwater Management Division.

In addition, the proposed project would be required to develop a SWPPP and implement construction-related best management practices. The SWPPP would require implementation of an erosion control plan to reduce the potential for wind or waterborne erosion during the construction process. Therefore, with compliance with the existing regulatory requirements, impacts would be less than significant.

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

The proposed project would be located on a relatively flat site. Mud (consisting of silt and clay and interbedded sand) is present from the surface to a depth of approximately 40 to 50 feet bgs. In some areas, silty sand or sand was observed between approximately 15 and 30 feet bgs. Silt with interbedded sand and clay was noted between approximately 50 and 80 feet across most of the project site (Metro, 2016 (a,b,c)). According to the California Department of Conservation's Seismic Hazard Zones Map for the Venice Quadrangle, the proposed project would not be located on ground that could be exposed to or result in landslides, lateral spreading, subsidence, liquefaction or collapse (California Department of Conservation, 1999). Therefore, no impact would occur.

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

Expansive soils have relatively high clay mineral content and are usually found in areas where underlying formations contain an abundance of clay minerals. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. On the project site, mud (consisting of silt and clay and interbedded sand) is present from the surface to a depth of approximately 40 to 50 feet bgs. In some areas, silty sand or sand was observed between approximately 15 and 30 feet bgs. Silt with interbedded sand and clay was noted between approximately 50 and 80 feet across most of the project site (Metro, 2016(a,b,c)). Therefore, soils on the project site may have the potential to shrink and swell resulting from changes in the moisture content. However, the proposed project would be required to comply with the requirements of the UBC, LAMC and other applicable building codes. Compliance with such requirements would reduce impacts related to expansive soils. Therefore, with compliance with the existing regulatory requirements, impacts would be less than significant.

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

The project site is located in a highly urbanized area, where wastewater infrastructure currently exists. The proposed project would connect to existing sewer lines that serve the project site and would not use septic tanks or alternative wastewater disposal systems. Therefore, the capability of the soil to support septic tanks or alternative waste water disposal systems is not relevant to the proposed project. Therefore, no impact would occur.

4.4.6. Hydrology and Water Quality

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

Construction activities such as earth moving, maintenance/operation of construction equipment and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. The proposed project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Construction Activity Permit. In accordance with the requirements of the permit, the Applicant would prepare and implement a site-specific SWPPP. The SWPPP would specify erosion control, sediment control and non-stormwater management and materials management.

In addition, the SWPPP would address requirements throughout the operational life of the proposed project through source and treatment control. Source control would be used to prevent pollutants from entering into the stormwater discharges and may include effective site design and landscape planning, storm drain signage, properly managed maintenance bays and docks, properly managed trash storage areas, proper design and maintenance of outdoor materials storage areas and proper maintenance of structural/treatment control. In addition, storm drainage improvements would convey stormwater runoff from the project site by constructing a series of storm drains and laterals within the site to receive flows from the developed portions of the site. Streets, curbs and gutters would direct street flows into collection points, where flows would enter the storm drain. Furthermore, the proposed project would be consistent with the guidelines and standards outlined in the City of Los Angeles' Low Impact Development (LID) ordinance (LAMC, 2012). The main purpose of this law is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater at its source, while utilizing natural resources. Therefore, with compliance with the existing regulatory requirements, impacts would be less than significant.

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

The proposed project would not require the use of groundwater at the project site. Potable water would be supplied by the Los Angeles Department of Water and Power (LADWP), which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. Operation of the project would not require direct additions or withdrawals of groundwater. In addition, since the existing project site is almost entirely impermeable, the proposed project would not reduce any existing percolation of surface water into the groundwater table. The proposed project would not directly result in a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, no impact would occur.

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

The project site is located in a highly developed urban area, and is almost entirely impervious. The proposed project would create several landscape locations throughout the project site which would increase the pervious surface by an estimated 3.19 acres. The increase in the pervious area will decrease the amount of stormwater runoff currently produced from the site by allowing the storm water in pervious (landscape) areas to infiltrate into the ground naturally. Stormwater runoff acts as overland sheet flow on-site which is collected and curb drained out to Aviation Boulevard. There is one existing storm drain line located along a portion of Aviation Boulevard near the southernmost part of the site; no existing storm drain lines along Arbor Vitae Street. Existing topography indicates that runoff discharged into the street gutter will flow from west to east along Arbor Vitae Street and north to south along Aviation Boulevard. Runoff flowing along Aviation Boulevard would be collected by a side opening catch basin near the southernmost part of the project site. Catch basin discharges would flow to a 48-inch reinforced concrete pipe, owned by Los Angeles County that runs under Aviation Boulevard from West 98th Street to Century Boulevard. In addition, prior to receiving construction permits, the proposed project would be required to prepare an SWPPP. The nearest stream in the project vicinity is the Centinela Creek Channel, located approximately three miles northwest of the project site. There are no streams or rivers located in the project vicinity. Off-site run-off from upstream areas will continue to transverse the project site and be conveyed to the surrounding streets and the existing storm drainage system. As previously discussed, the SWPPP would control and minimize erosion and siltation. Therefore, with compliance with the existing regulatory requirements, impacts would be less than significant.

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

The nearest stream in the project vicinity is the Centinela Creek Channel, located approximately three miles northwest of the project site. As previously discussed, the SWPPP would control and minimize the potential for flooding. During project operation, storm water and any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. The proposed project would create several landscape locations throughout the project site which would increase the pervious surface by an estimated 3.19 acres. The increase in the pervious area will decrease the amount of storm water runoff currently produced from the site, by allowing the storm water in pervious (landscape) areas to infiltrate into the ground naturally. In addition, prior to receiving construction permits, the proposed project would be required to prepare a drainage plan. Therefore, with compliance with the existing regulatory requirements, impacts would be less than significant.

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

As discussed above, the SWPPP would ensure that surface water runoff would continue to flow to the City's storm drain system. The proposed project would increase pervious surfaces and would decrease the overall amount of storm water runoff currently produced from the site, by allowing the storm water in pervious areas to infiltrate into the ground naturally. Accordingly, since the volume of runoff from the site would decrease over existing conditions, water runoff after development would not exceed the capacity of existing or planned drainage systems. The proposed project would not create or contribute runoff water that would exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff. Impacts related to exceedance of existing storm drain capacities or water quality would be less than significant. Therefore, no impact would occur.

- f) Would the proposed project otherwise substantially degrade water quality?**

Refer to discussion in Subsection 4.4.6(a) above. Therefore, no impact would occur.

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

The proposed project does not include housing. Therefore, no impact would occur.

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

The project site is not within a 100-year flood hazard area (FEMA, 2008; City of Los Angeles, 1996). Therefore, no impact would occur.

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

According to the City of Los Angeles Hazard Mitigation Plan Dam Inundation Area Map, the project site and the surrounding areas are not located within a flood hazard area as a result of levee or dam failure (City of Los Angeles, 2011 (a)). Therefore, no impact would occur.

j) Would the proposed project be vulnerable to inundation by seiche, tsunami, or mudflow?

According to City of Los Angeles Hazard Mitigation Plan Tsunami Inundation Hazard Areas Map, the project site is not within an inundation zone for a seiche or tsunami (City of Los Angeles, 2011 (b)). In addition, the project site is not located within a landslide hazard area and therefore would not be vulnerable to damage caused by a mudflow (California Department of Conservation, 1999; City of Los Angeles, 1996). Therefore, no impact would occur.

4.4.7. Mineral Resources

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

The project site is not classified as containing significant mineral deposits (Los Angeles Citywide General Plan Framework DEIR, 1995). Additionally, the project site is not identified as being located in an oil field or a mineral extraction land use (Safety Element of the Los Angeles City General Plan, 1996). Therefore, no impact would occur.

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

Refer to discussion in Subsection 4.4.7(a) above. Therefore, no impact would occur.

4.4.8. Population and Housing

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

The proposed project does not include housing. Although the proposed project does involve the development of new infrastructure, its primary purpose is to provide an easier

connection to LAX and the regional bus and rail transit system. The proposed project would not induce substantial population growth. Therefore, no impact would occur.

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

The project site is not developed with housing and would not displace existing housing. Therefore, no impact would occur.

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

Refer to discussion in Subsection 4.4.8(b) above. Therefore, no impact would occur.

4.4.9. Public Services

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

i) Fire protection?

The project site and the surrounding area are currently served by City of Los Angeles Fire Department (LAFD) Fire Station 95, located at 10010 International Road (approximately half a mile to the southwest). The project site is also served by Fire Station 5 located at 8900 Emerson Avenue (approximately 1.5 miles to the northwest), Fire Station 51 located at 10435 Sepulveda Boulevard (approximately 1.6 miles to the southwest) and Fire Station 80 located at 7250 World Way (approximately 2.5 miles to the southwest) (CERT, 2015 and LAFD, 2016). These stations also provide paramedic services.

The proposed project does not include housing and would not result in population growth. It is not anticipated that the proposed project would create a substantial increase in demand for fire protection and paramedic services. In addition, the intensity of proposed development on the project site would be consistent with the existing development in terms of fire protection services requirements. Nonetheless, to maintain the level of fire protection and paramedic services at the time of project buildout, the LAFD may require additional personnel and equipment. The LAFD Deployment Plan has been in place since mid-2011. Under the LAFD Deployment Plan, the service delivery area of each fire station is drawn to allow fire apparatus to reach any address in that district within a specified response time. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents and call frequencies, LAFD can shift resources to meet local demands for fire protection and paramedic services. In addition, fire hydrant flow provisions would be expected to be in compliance with City of Los Angeles standards. Therefore, a less than significant impact would occur.

ii) Police protection?

Metro transit services are served by the Los Angeles County Sheriff's Department (LASD) (LASD, 2016). Metro contracts with the LASD to provide law enforcement across the entire Metro system. The two closest LASD stations are the Marina del Rey Station (approximately 4 miles to the northwest) and the South Los Angeles Station (approximately 5 miles to the southeast). The County of Los Angeles is required by state law to organize a formal mutual aid agreement between all police departments within a county or city's jurisdiction. This agreement is set forth in the Mutual Aid Operations Plan for Los Angeles County. Pursuant to this agreement, in the event of a significant event which requires immediate response by more law enforcement personnel, police responders from the Los Angeles Police Department may be called upon to respond to emergencies at the proposed transportation center. Similarly, LAPD units may be called upon to assist police personnel to the County Sheriff Department. However, LAPD has primary responsibility over the City of Los Angeles. Patrol of transit stations is performed by LASD security personnel and deputies overseen by the Transit Services Bureau part of the LASD's Office of Homeland Security. LASD security personnel work primarily on fare evasion and passenger complaints, but also respond to and track all criminal activities that occur on Metro buses, subways and LRT, and all transit stations. LASD deputies, both uniformed and undercover, patrol all vehicles of the Metro-operated LRT systems, as well as all Metro-operated buses, bus-transit ways and subway systems.

The proposed project would not increase population within the service area and employment would be limited to kiosk-type retail space. It is not anticipated that the proposed project would create a substantial increase in demand for police protection services. The LASD patrols transit stations and trains on a regular basis. Response times would be minimally affected by the proposed project due largely to the fact that most officers respond to calls for service from the field, and not from the station. In addition to regular LASD patrols at stations and on trains, the proposed project would incorporate security features to provide for the safety of visitors and employees. These features would include lighting throughout the project site to ensure safety and visibility, video surveillance and a security office located in the Metro Hub. The inclusion of these security measures would reduce a potential increase in the number for calls for service, the need to deploy additional police officers, and/or increased patrols within the vicinity of the project site. Therefore, a less than significant impact would occur.

iii) Schools?

The proposed project does not include housing nor would it induce population growth and therefore, would not result in school demand associated with an increase in residential population. Therefore, no impact would occur.

iv) Parks?

The proposed project would not acquire parkland nor would it include housing or growth inducing development that would typically increase demand for park usage. The proposed project would create a small number of jobs associated with commercial services; however, employees would not typically use parks during the work day. Landscaped areas would provide park space for employees at the project site. In addition, it is not anticipated that any employees that relocate to the proposed project would also relocate their residence, thus increasing the demand on parkland. Therefore, no impact would occur.

v) Other public facilities?

The proposed project does not include housing and would not generate population growth that would affect other public facilities such as libraries. Therefore, no impact would occur.

4.4.10. Recreation

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

The closest park to the project site is Carl E. Nielson Youth Park, located approximately 0.5 miles to the northwest. The proposed project would not include housing or growth inducing development and therefore, there would not be an increase in parkland demand. The proposed project would create a few jobs associated with kiosk-type retail space (i.e., food/beverage and convenience) services, although employees would not typically use parks during the work day. Landscaped areas would provide open space for employees on the project site. In addition, it is not anticipated that any employees that relocate to the proposed project would also relocate their residences, thus increasing the demand on parkland. The proposed project is designed to provide a bus connection to the CTA and the regional bus and rail transit system. It is not anticipated that transit riders of the proposed project would use this transportation center to access parks or recreational facilities. Therefore, no impact would occur.

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

The proposed project would not include the construction of a recreational facility nor the expansion of existing recreational facilities. The proposed project is designed to provide a bus connection to the CTA and regional bus and rail transit system. It is not anticipated that transit riders of the proposed project would use this transportation center to access parks or recreational facilities. Therefore, no impact would occur.

4.4.11. Utilities and Service Systems

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

Wastewater from the proposed project would be served by the Hyperion Treatment Plant (HTP) located at 12000 Vista del Mar, Playa del Rey. The HTP includes full secondary treatment of wastewater, biosolids handling, as well as biogas to electricity generation. It is important to consider the existing and anticipated wastewater generation of the project in relation to current average daily flows experienced at the HTP, as well as in proportion to remaining capacity of the system. On average the HTP receives approximately 350 million gallons per day (mgd) of wastewater, with a maximum capacity of 1,000 mgd (City of Los Angeles Department of Sewers, 2016). The project site is currently occupied by a rental car service center and towing service. According to the California Emission Estimator Model, the rental car facility generates approximately 546 gallons of per day (gpd) of wastewater and the towing service generates approximately 39 gpd of wastewater (TAHA, 2016 and CAPCOA, 2013). As a whole, existing uses on the project site generate approximately 585 gpd of wastewater.

The proposed project would generate approximately 32,877 gpd of wastewater (Metro, 2016(d)). This would result in a net increase of approximately 32,292 gpd of wastewater (Metro, 2016(d)). As a proportion of total average daily flow experienced by the HTP, the wastewater generation of the proposed project would account for 0.00009 percent of average daily wastewater flow or 0.00004 percent of the 750 mgd remaining treatment capacity of HTP. This increase in wastewater flow would not jeopardize the HTP to operate within its established wastewater treatment requirements. Furthermore, all wastewater from the project would be treated according to requirements of the NPDES permit authorized by the LARWQCB. Therefore, no impact would occur.

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

Water and wastewater connections to the project site would be from Aviation Boulevard or Arbor Vitae Street. The LADWP maintains 12- and 16-inch water service connections on Aviation Boulevard and 8- and 12-inch water service connections on Arbor Vitae Street. The City of Los Angeles maintains 8-inch sewer lines on Aviation Boulevard and Arbor Vitae Street, along with a 36 inch Vitrified Clay Pipe gravity sewer line on Arbor Vitae Street. As discussed in Subsection 4.4.11 (a) above, the proposed project would not create wastewater system treatment capacity issues. Similarly, it is not anticipated that the proposed project would cause sewer or water line capacity issues based on the amount of anticipated flow. In addition, as further discussed below in Subsection 4.4.11 (d), the proposed project would not require the expansion of existing water treatment facilities. Therefore, no impact would occur.

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

The proposed project would maintain existing drainage patterns; site-generated surface water runoff would continue to flow to the City's storm drain system. Stormwater runoff acts as overland sheet flow on-site which is collected and curb drained to Aviation Boulevard. There is one existing storm drain line located along a portion of Aviation Boulevard near the southernmost part of the site; no existing storm drain lines near the project site along Arbor Vitae Street. Existing topography indicates that runoff discharged into the street gutter will flow from west to east along Arbor Vitae Street and north to south along Aviation Boulevard. Runoff flowing along Aviation Boulevard would be collected by a side opening catch basin near the southernmost part of the site. Catch basin discharges would flow to a 48-inch reinforced concrete pipe owned by Los Angeles County running under Aviation Boulevard from West 98th Street to Century Boulevard. The proposed project would create several landscape locations throughout the impervious areas on the site, and increase the pervious surface by an estimated 3.19 acres. The increase in the pervious area would decrease the amount of stormwater runoff currently produced from the site, by allowing the stormwater in pervious areas to infiltrate naturally.

Accordingly, since the volume of runoff from the site would decrease over existing conditions, water runoff after development would not exceed the capacity of existing or planned drainage systems. The proposed project would not create or contribute runoff water that would exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff. Therefore, no impact would occur.

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

LADWP conducts water planning based on an econometric water demand forecasting approach. Water demand is projected by major category (single-family, multi-family, commercial, industrial and government) as well as weather conditions. From 2015 to 2035 the City's water demand is expected to grow by approximately 95,996 acre-feet, with water supplies to meet this demand (LADWP, 2010).

The California Emission Estimator Model estimates that the rental car facility uses approximately 8,576 gpd of water and the towing service uses approximately 613 gpd of water (TAHA, 2016 and CAPCOA, 2013). As a whole, existing uses on the project site use approximately 9,189 gpd of water.

The proposed project would use approximately 158,904 gpd of water and result in a net increase of 149,715 gpd of water use over existing uses. The Metro ECMP is a strategic blueprint to guide energy and water use in a sustainable, cost-effective and efficient manner. The proposed project has several defined mandatory goals for sustainability, specifically focused on achieving a LEED Silver minimum rating and compliance with the California Green Building Code. The design would focus on reductions in potable water

demand for the building and landscape, as well as reductions in wastewater (e.g., increased use of recycled water and wastewater reductions). Features, such as drought tolerant landscaping, high-efficiency toilets, and “smart” irrigation controllers could result in a reduction in the estimated potable water consumption by at least 20 percent and landscaping water demand by at least 50 percent. The LADWP Westside Water Recycling Project was completed in 1997. Running along the perimeter of LAX, the Westside Water Recycling Project pipeline uses recycled water from the Edward C. Little Water Recycling Facility. The proposed project may use this pipeline to supply recycled water to the project site for irrigation, though, for the purposes of this analysis, this is not assumed. As such, the estimated water demand for the proposed project is conservative and provides a worst-case. Accordingly, the 150,328 gpd increase in water usage resulting from the proposed project would not be considered substantial in consideration of anticipated growth.

Additionally, operation of the proposed project falls within the planning period for the 2010 Urban Water Management Plan (UWMP) and was anticipated by LADWP as a part of the overall growth of in their service area. As discussed above, the UWMP concluded that LADWP has sufficient water supplies to meet projected demands. Therefore, the project demand for water would not require new water supply entitlements beyond those already considered in the 2010 UWMP. Therefore, no impact would occur.

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

Refer to discussion Subsection 4.4.11 (a) above. The existing wastewater provider would have sufficient capacity to accommodate the proposed project. Therefore, no impact would occur.

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

A significant impact would occur if the proposed project’s solid waste generation exceeded the capacity of permitted landfills. The Bureau of Sanitation (BOS) and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City of Los Angeles, including the project site. Solid waste generated by single-family and some multi-family residences is collected by the BOS (City of Los Angeles, 2001). Other multi-family residences and all industrial and commercial buildings contract with private contracted waste haulers to collect, dispose and recycle solid waste.

Table 4.1 lists the location, remaining capacity, permitted daily intake capacity, the average daily volume of solid waste disposed of at the landfills serving the City of Los Angeles, and the approximate tons per day of solid waste that the City of Los Angeles disposed of at each landfill. Over 95 percent of the City’s solid waste in 2014 was disposed of at the Chiquita Canyon and Sunshine Canyon Landfills (both the City and County portions).

Table 4.1 Solid Waste Facilities Serving the City of Los Angeles

Facility Name	Location	Permitted Daily Intake Capacity (tons/day)	2014 Average Daily Disposal (tons/day) ¹	Remaining Daily Intake Capacity (tons/day)	Remaining Total Intake Capacity (tons)
CLASS III LANDFILLS					
Antelope Valley	Palmdale	1,800	1,433	367	14,944,183
Chiquita Canyon ¹	Castaic	6,000	3,558	2,442	1,833,353
Calabasas Landfill	Agoura	3,500	748	2,752	6,530,462
Lancaster	Lancaster	3,000	311	2,689	12,009,106
Sunshine Canyon	LA City & Sylmar	12,100	7,582	4,518	64,688,021
TOTAL CLASS III LANDFILL		23,700	13,632	12,768	100,005,125

¹ A proposed expansion of the Chiquita Canyon Landfill would result in a permitted daily intake capacity of 12,000 tons.

Source: County of Los Angeles, 2015.

The City of Los Angeles primarily uses the Sunshine Canyon and Chiquita Canyon landfills. Refuse collected by BOS and private haulers is disposed of at the regional landfills and waste-to-energy facilities listed in Table 4.1. The Class III landfills accepting waste from the City have a total daily intake capacity of 23,700 tons per day and a remaining capacity of approximately 100 million tons. According to the County of Los Angeles Department of Public Works' 2014 Annual Report, landfills serving the City of Los Angeles have closure dates ranging from 2019 (Chiquita Canyon Landfill) to 2041 (Lancaster Landfill). Based on information in the California Emission Estimator Model, the rental car facility generates approximately 56 pounds per day (ppd) of solid waste and the towing service generates approximately 4 ppd of solid waste, or a total of 60 ppd.

Solid waste during the operation of the proposed project would be hauled to one of the landfills listed in Table 4.1 above. Based on information in the California Emission Estimator Model, the proposed project would generate approximately 1,470 ppd (or 0.74 tons per day) of solid waste and result in a net increase of 1,410 ppd of solid waste. This would amount to an annual solid waste generation of approximately 325 tons. Solid waste generated by the proposed project would represent less than 0.00007 percent of the remaining daily permitted intake capacity of the landfills listed in Table 4.1. If the largest landfill were to close (i.e., Sunshine Canyon), solid waste generated by the proposed project would represent less than 0.00008 percent of the remaining daily permitted intake capacity of the landfills listed in Table 4.1.

In compliance with Assembly Bill (AB) 939, the project applicant would be required to implement a Solid Waste Diversion Program and divert at least 50 percent of the solid waste generated by the project from landfills. Compliance with AB 939 would result in the reduction of solid waste generated by the proposed project to 578 ppd. Solid waste generated by the proposed project would be sufficiently accommodated by the landfills listed in Table 4.1, which have a remaining daily intake capacity of 12,768 tons per day. This is also accurate if the proposed project complies with all federal, state and local regulations related to solid waste. Therefore, no impact would occur.

g) Would the proposed project comply with federal, state, and local statutes and regulations related to solid waste?

Refer to discussion in Subsection 4.4.11 (f) above. The proposed project would comply with all federal, state and local statutes and regulations related to solid waste. Therefore, no impact would occur.

4.4.12. Energy Resources

In accordance with Appendix F of the state CEQA Guidelines, this discussion addresses the energy implications of the proposed project. This section represents a summary of the proposed project's anticipated energy needs, impacts and conservation measures. Information found herein, as well as other aspects of the proposed project's energy implications, are discussed in greater detail elsewhere in this Draft EIR, including Chapter 2 Project Description and Section 3.2, Greenhouse Gas Emissions, and Section 3.6, Transportation and Traffic, respectively. Energy resource demand for the proposed project is examined separately for short-term construction activities and long-term operational conditions in this subsection. Energy calculations are included in Appendix B.

Construction

Construction of the proposed project is anticipated to begin in the summer of 2020 and last for approximately 36 months. During this time, the construction activities on the project site would utilize energy resources primarily in the forms of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and delivery and haul truck trips; electricity associated with conveyance of water that would be used for dust control during construction of the proposed project; and energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber. Energy demand for the proposed project is assessed in the context of fuel and electricity use.

The petroleum-based fuel use was conservatively estimated assuming maximum intensity construction activities were occurring daily, such that all pieces of equipment were operating simultaneously and continuously. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. In addition, construction activities would be subject to compliance with applicable regulatory requirements designed to reduce consumption of energy resources, such as those presented in Section 3.1, Air Quality and Section 3.2, Greenhouse Gas Emissions. Specifically, CARB regulatory requirements would require idling of all diesel-fueled commercial vehicles over 10,000 pounds to be limited to five minutes at any location during construction. Compliance with this measure, among others, would reduce the consumption of petroleum-based fuels during construction activities. Table 4.2 displays the petroleum-based fuel required by equipment, haul trucks and worker vehicles during construction activities. Also presented is the total combustion energy expressed in therms (100,000 BTU).

Table 4.2 Fuel and Combustion Energy from Construction Activities

Vehicle Class	Fuel Type	Fuel Required (Gallons)	Combustion Energy (Therms)
Off-Road Heavy Duty Equipment	Diesel	73,044	101,159
On-Road Heavy Duty Trucks	Diesel	56,921	73,979
On-Road Passenger Vehicles	Gasoline	62,459	87,221

Source: Terry A. Hayes Associates Inc., 2016.

As described above, electricity would be consumed through the conveyance of the water used during construction activities required for fugitive dust control during site preparation, excavation and grading. In accordance with SCAQMD Rule 403, it is anticipated that watering would occur three times daily to reduce fugitive dust emissions from material movement and travel on unpaved surfaces. Using standard methodology from CalEEMod, it was estimated that watering during construction activities would require approximately 453,000 gallons, resulting in the consumption of 4,406 kWhr of electricity through water conveyance. Additionally, electricity may be used to provide any necessary temporary power for lighting and electronic equipment inside temporary construction trailers and within the proposed structures. This electricity, if needed, would be supplied to the project site by LADWP and would be obtained from the existing electrical lines that connect to the project site. Similar to the use of petroleum-based fuels, electricity consumed during construction of the proposed project would be temporary and cease upon completion of construction, as well as vary depending on site-specific operations and the amount of construction occurring at any given time. Furthermore, the electricity demand during construction would be slightly offset with the removal of the existing development onsite which currently generate a demand for electricity.

Electricity is currently provided to the project site. Construction of the proposed project's electrical infrastructure would occur entirely within the project site with the possible need for an off-site tie in to adjacent electrical poles. As such, construction of the proposed project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses, utility system capacity, or existing electrical infrastructure. The on-site electrical system for the proposed project would consist of underground electrical lines, conduits, banks and transformers, as needed. Where feasible, the new service installations and connections would be scheduled and implemented in a manner that would not result in electrical service interruptions to other properties. Compliance with LADWP's guidelines and requirements would ensure that Metro fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations with LADWP, and limits any impacts associated with grading, construction and development within LADWP easements.

While it is difficult to measure the energy used in the production of construction materials such as asphalt, steel and concrete, it is reasonable to assume that the production of building materials would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. In addition, the proposed project would feature a sustainable design achieving minimum LEED Silver rating and compliance with the CALGreen building code. This would result in the use of sustainable materials and recycled content that

would reduce energy consumption during construction activities. Furthermore, the proposed project would incorporate BMPs and equipment specifications outlined in Metro's Green Construction Policy.

The proposed project's on-site construction activities would not result in the wasteful, inefficient, or unnecessary use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services or result in a significant impact associated with the construction or new or expanded energy facilities. As discussed above, construction of the proposed project would not violate any local, state or federal energy standards or consume a substantially greater amount of energy than other similar projects. Therefore, no impact would occur.

Operations

During operation of the proposed project, energy would be consumed through building mechanisms (such as air conditioners) and fuel combustion in buses and passenger vehicles traveling to and from the project site (mobile, off-site). As discussed in Section 3.1, Air Quality, information regarding the proposed project's energy demand was obtained directly from the utilities analysis (Metro, 2016(d)). CalEEMod was utilized to quantify estimates of building energy demand of land uses currently existing on the project site. Under the future without project condition (2035), the existing land uses were assumed to continue to operate under the same circumstances as existing conditions. Table 4.3 displays the results of annual energy demand analyses under existing conditions, future without project and the future with project condition.

Mobile energy consumption would result from bus fuel combustion and passenger vehicle gasoline and diesel fuel combustion. Table 4.3 includes the natural gas, gasoline and diesel fuel consumption under existing conditions, the future without project condition and the future with project condition. Changes in bus fuel consumption under the future without project condition assume that the transit station would be implemented at an alternative location at the Aviation/Century station.

Electricity transmission to the project site is provided and maintained by LADWP through a network of utility poles and underground utility lines. As shown in Table 4.3, the proposed project would result in an electricity demand increase of 10,384,066 kWhr annually. Since the existing uses on the project site consume electricity, the proposed project would not require new sources of electricity. As discussed above, the proposed project is seeking a minimum rating of LEED Silver and to meet the mandatory requirements of the CALGreen building code. As such, the proposed project would not place a disproportionate burden on the LADWP grid relative to similar projects since it would consume less electricity than similar buildings.

Table 4.3 Annual Energy Demand During Operations

Energy Resource	Existing Conditions	Future without Project	Future with Project
Electricity			
Building Mechanisms (kWhr/year)	170,000	170,000	10,000,000
Water Supply (kWhr/year)	32,624	32,624	564,166
Wastewater Treatment (kWhr/year)	408	408	22,932
Total Electricity Demand (kWhr/year)	203,032	203,032	10,587,098
Natural Gas			
Building Envelope Natural Gas (therms/year)	1,279	1,279	120,000
CNG Bus Natural Gas (therms/year)	3,190,550	3,026,467	3,084,415
Total Natural Gas (therms/year)	3,191,829	3,027,746	3,204,415
Fuel			
Passenger Vehicle Gasoline (gallons)	6,215,138,904	5,318,465,002	5,318,489,732
Passenger Vehicle Diesel (gallons)	26,576,698	40,818,535	40,808,632

Source: Terry A. Hayes Associates Inc., 2016.

Natural gas is supplied to the project site by SoCalGas. The proposed project would result in a net annual increase of 12,586 therms of natural gas (1,219,583 cubic feet) relative to existing conditions and a net annual increase of 176,669 therms of natural gas (17,119,226 cubic feet) relative to the future without project condition. SoCalGas has a storage capacity of 136 billion cubic feet. The proposed project would not require the need for a new source of natural gas provision, nor would it place a disproportionate burden on the SoCalGas supply relative to similar projects.

Energy consumed by the proposed project would be reduced through the implementation of a variety of measures designed to reduce energy consumption. The proposed project would comply with applicable mandatory provisions of the 2013 CALGreen Code, in accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code, as amended pursuant to City of Los Angeles Ordinance No. 182,849). The City of Los Angeles Green Building Code also includes a variety of measures for energy reduction, renewable energy, water usage, and construction waste disposal and recycling. In addition, the proposed project would be designed to accommodate solar energy installations, comply with the Metro Energy and Sustainability policy and achieve at least a LEED Silver rating. LEED features shall include, but not be limited to, energy-efficient building systems, a pedestrian- and bike-friendly site design, and water conservation measures, among others.

Solid waste collection services are provided by the City of Los Angeles Bureau of Sanitation. The proposed project would result in the disposal of approximately 325 tons of solid waste annually, which represents approximately 0.0003 percent of the estimated Class III landfill capacity available to the City of Los Angeles. In addition, the proposed project's net increase of approximately 0.86 tons of daily solid waste would represent between 0.0175 and 0.089 percent of the remaining daily intake capacity for the various landfills available to the City of Los Angeles (County of Los Angeles, 2013). Therefore, the landfills that service the proposed project would have adequate capacity to accept the solid waste that would be generated under future operating conditions.

Overall, the proposed project would be designed and constructed in accordance with state and local green building standards that would serve to reduce the energy demand of the proposed project. In addition, based on the above evaluation, the proposed project's energy demand would be within the existing and planned electricity and natural gas capacities of LADWP and SoCalGas, respectively. The proposed project would not violate state or federal energy standards or consume a substantial amount of energy in either construction or operation as compared to similar projects. As such, implementation of the proposed project would not cause wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. Therefore, no impact would occur.