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 (EMG) has determined the proposed project is subject to CEQA and no exemptions apply. Therefore, 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 eight 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 that could potentially affect the proposed project or be affected by the proposed project.

Section IV, Potential Environmental Effects: 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.

C. CEQA Process

To begin the CEQA process, the lead agency identifies a proposed project. The lead agency then prepares an initial study to identify the preliminary environmental impacts of the proposed project. The Initial Study for the Restoration of Historic Streetcar Service in Downtown Los Angeles project determined that the proposed project could have significant environmental impacts that would require further study and/or the implementation of mitigation measures and the lead agency has decided to prepare an Environmental Impact Report/Environmental Assessment (EIR/EA). A Notice of Preparation is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR/EA for the proposed project. The Notice of Preparation and initial study are circulated for a 30-day review and comment period. During this review period, the lead agency requests comments from agencies, interested parties, stakeholders, and the general public on the scope and content of the environmental information to be included in the EIR/EA.

After the close of the 30-day review and comment period, the lead agency continues the preparation of the Draft EIR/EA and associated technical studies (if any). Once the Draft EIR/EA is complete, a Notice of Availability is prepared to inform the public agencies and the general public of the document and the locations where the document can be reviewed. The Draft EIR/EA and Notice of Availability are circulated
for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR/EA and comment on the adequacy of the analysis and the findings of the lead agency regarding potential environmental impacts of the proposed project. After the close of the 45-day review and comment period, responses to all comments received on the Draft EIR/EA are prepared. The lead agency prepares a Final EIR/EA, which incorporates the Draft EIR/EA or a revision to the Draft EIR/EA, Draft EIR/EA comments and list of commenters, and a response to comments discussion. In addition, the lead agency must prepare the findings of fact for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring and reporting program to ensure that all proposed mitigation measures are implemented.

The Board of Public Works will consider the Final EIR/EA, together with any comments received during the public review process, and may certify the Final EIR/EA and approve the project or refer the Final EIR/EA and project with a recommendation to the City Council on whether or not to certify the Final EIR/EA and approve the project. If referred to Council, one or more Council committees may then review the proposal and documents and make its own recommendation to the full City Council. The full City Council would consider the Final EIR/EA, together with any comments received during the review and comment process, in the decision to certify the Final EIR/EA and approve or disapprove the project.

During the project approval process, persons and/or agencies may address either the Board of Public Works or the City Council regarding the project. Public notification of agenda items for the Board of Public Works, 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://eng.lacity.org/techdocs/emg/.

Within five days of project approval, the City will file a Notice of Determination with the County Clerk. 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 that 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 proposed project, which would be located in Downtown Los Angeles, would travel through the following neighborhoods/districts (from north to south): the Civic Center, Bunker Hill, the Historic Core, the Jewelry District, the Financial Core, South Park, the Fashion District, and the Los Angeles Sports and Entertainment District, all of which are located within the Central City Community Plan area of the City of Los Angeles. The proposed 3.8-mile project alignment, which would run along 1st Street, Broadway, 11th Street, Figueroa Street, Grand Avenue, 7th Street or 9th Street, and Hill Street, would cover an area comprised primarily of commercial land uses with a mix of residential, public, and entertainment uses interspersed throughout the project vicinity. Figure 1 depicts the regional location of the proposed project. Figures 2 and 3 depict the alignments of the project alternatives.

B. Purpose

The proposed project has two overarching objectives and several sub-objectives.

- Enhance mobility and transit circulation in Downtown Los Angeles through the following:
  - Connect major districts, destinations, and activity centers.
  - Improve transit coverage and circulation.
  - Provide simple, localized, high frequency service.
  - Alleviate traffic and reduce parking demand.
  - Serve transit-dependent populations.
  - Improve transit accessibility.
- Support the growth and revitalization of Downtown Los Angeles, including its historic districts through the following:
  - Revitalize geographically isolated, economically depressed areas.
  - Support smart, sustainable growth.
  - Foster a more livable Downtown.
  - Encourage historic restoration and transit-oriented development.
  - Strengthen Downtown's economic competitiveness.

The proposed project aims to address the challenges of navigating a disconnected downtown area by providing a transportation link between various districts. By connecting residential and employment hubs, shopping districts, civic resources, cultural institutions, historic landmarks, entertainment venues, and transit services, the project would increase mobility and accessibility for people who live and work in Downtown, as well as for visitors. The proposed project would promote transit use and walking within Downtown while reducing the need to travel by automobile.

In concert with local efforts, the project is intended to aid in the revitalization of many Downtown districts, including the Historic Core. Local initiatives such as Bringing Back
Broadway (an effort to restore Broadway, which contains the highest concentration of 
historic theaters in the western United States), redevelopment plans, street 
improvements, and proposed design guidelines have been proposed to restore the 
area’s historic significance and stimulate economic development opportunities. The 
reintroduction of streetcar service is proposed to facilitate the renewal of the Historic 
Core and also support growth and revitalization of the underdeveloped neighborhoods 
in the area.

C. Description

There are two alternative alignments that are under consideration for the Restoration of 
Historic Streetcar Service Project:

**Locally Preferred Alternative** – The proposed project would construct and implement 
streetcar service along a one-way loop that would run from 1st Street on the north, 
through Downtown Los Angeles, to 11th Street on the south. The project alignment 
would begin and terminate on Grand Avenue, one block south of 1st Street. From that 
point, the streetcar would run northbound and turn on 1st Street in the eastbound 
direction. From 1st Street, the streetcar would turn southbound, down Broadway, 
travelling 1.25 miles to 11th Street where it would turn westbound. The streetcar would 
then turn north on Figueroa Street and travel 0.5 mile north to 7th Street where it would 
turn in the eastbound direction. From 7th Street, the streetcar would turn northbound on 
Hill Street, continue north back to 1st Street, then complete the circuit and turn 
westbound on 1st Street to return to the streetcar terminal stop on Grand Avenue south 
of 1st Street, by the Disney Concert Hall. Figure 2 depicts the LPA alignment.

**9th Street Alternative** – The 9th Street Alternative would follow the same alignment as 
the LPA but would run eastbound on 9th Street between Figueroa Street and Hill Street 
rather than 7th Street. Figure 3 depicts the 9th Street alignment.

Under both alternatives, there are three potential sites for the maintenance and storage 
facilities. These include an approximately 39,800-square-foot site located along 
Broadway, midblock between 2nd Street and 3rd Street; an approximately 66,600-
square-foot site at the northeast corner of 5th Street and Olive Street; and an 
approximately 30,500-square-foot site at the southeast corner of 11th Street and Grand 
Avenue.

Construction activities for both alternatives would affect portions of Grand Avenue, 1st 
Street, Broadway, 11th Street, Figueroa Street, 7th Street or 9th Street, and Hill Street. 
Furthermore, activities would include pavement removal, excavation, track installation, 
installation of concrete track slab and rails, paving and striping. Other activities would 
include installation of specialty system work such as traction power, overhead contact 
wires, communications, and train/traffic signaling, curb, gutter, stop improvements, and 
overhead contact system (OCS) pole foundations. Unaffected traffic lanes would remain 
open during construction. Construction would take place between the hours of 7:00 a.m.
Figure 1
Regional Location Map
Restoration of Historic Streetcar Service in Downtown Los Angeles
Figure 2
Locally Preferred Alternative
Restoration of Historic Streetcar Service in Downtown Los Angeles
Figure 3
9th Street Alternative
Restoration of Historic Streetcar Service in Downtown Los Angeles
and 9:00 p.m., except for intersection construction, which would take place during nighttime hours.

The streetcar system would run within existing traffic lanes and would consist of a fleet of electric-powered vehicles utilizing a track and roadway configuration allowing for mixed-flow operations of streetcar vehicles and automobiles. Power for the streetcar system would be provided by a traction power system featuring traction power substations (TPSS) and an overhead contact system. The TPSS would convert high voltage power to approximately 600 volts direct current to power the electric trains. The TPSS are approximately 20 feet long, 15 feet wide, and 10 feet tall. There would be approximately five TPSS spaced evenly around the 3.8-mile loop, and there may be another TPSS at the Maintenance and Storage Facility. Streetcar stops would typically resemble bus stops with a raised platform along sidewalks. Streetcar stops would be approximately 70 to 120 feet long, and would be generally located along the sidewalk or as a sidewalk extension towards the traffic lane to meet the streetcar vehicle. An exception to this is the stop on Grand Avenue north of 2nd Street that is planned in the median with crosswalks to either side of the street. Streetcar stops would generally be placed every block in the north-south direction, and every other block in the east-west direction.

The streetcar system would operate seven days a week with a total of 3 to 6 streetcars running at any given time. Hours of operation would be approximately 6:00 AM to 12:00 AM on some days, and approximately 6:00 AM to 2:30 AM on some days, depending on demand. The run time for the round-trip would be approximately 35 minutes.

The analysis in this document assumes that, unless otherwise stated, the project would 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 (Reference 17)
- Bureau of Engineering Standard Plans (Reference 24)
- Standard Specifications for Public Works Construction (Reference 1)
- Work Area Traffic Control Handbook (Reference 2)

III. EXISTING ENVIRONMENT

The project corridor is within the Central City Plan area. The project is consistent with the community plan’s policies. The land use designations of the properties adjacent to the proposed corridor are composed primarily of high density residential, public facilities, commercial land uses, with numerous office buildings, regional center commercial, surface parking lots, and retail shops. The zoning designations for the properties adjacent to the proposed corridor comprise of commercial (C5, C2), open space (OS-1XL), multiple dwelling zone (R5), and public facilities (PF).
The project study area is a dense urban core covering 2.05 square miles and is comprised primarily of commercial land uses, with numerous office buildings and retail shops. In addition, the project study area is home to the region’s fastest growing residential area of over 45,000 residents. In recent years, there has been an increasing amount of residential and mixed land uses (especially in South Park and the Historic Core), with 9,391 units of housing having been built within Downtown since 2000 (an increase of 89 percent), and an additional 11,831 units are in planning (permitted, undergoing the approval process, or under consideration) (Reference 31). The proposed project area also has a substantial number of historic buildings. Some of these buildings have been restored; however, many remain vacant or abandoned totaling over one million square feet of unused commercial and residential space. Surface parking lots are also prevalent in the proposed project area.

The project study area is the region’s largest employment center with over 500,000 employees, and one of the region’s largest tourist destinations with over 10 million annual visitors (Reference 31). The project study area is also home to many of the region’s historic and cultural attractions, such as Bunker Hill (Disney Concert Hall, Museum of Contemporary Art, and future Broad Museum), Broadway (historic theaters and architecture), and Los Angeles Sports and Entertainment District (Staples Center, Nokia Theater, Convention Center, LA Live, Grammy Museum, and potential football stadium). The project study area is a regional hub for transit service, with the highest volumes of boardings/alightings in the Metro rail and bus system as well as connections to Metrolink, Amtrak, and other regional and intercity transportation.

IV. POTENTIAL ENVIRONMENTAL EFFECTS

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

- Aesthetics
- Biological Resources
- Greenhouse Gas Emissions
- Land Use / Planning
- Population / Housing
- Transportation/Traffic
- Agriculture and Forestry Resources
- Cultural Resources
- Hazards & Hazardous Materials
- Mineral Resources
- Public Services
- Utilities / Service Systems
- Air Quality
- Geology / Soils
- Hydrology / Water Quality
- Noise
- Mandatory Findings of Significance
A. Aesthetics

The proposed streetcar would travel through Downtown Los Angeles, an area that contains numerous historic buildings, districts, and architecturally significant resources that may be considered aesthetic/visual resources. The proposed project would alter the visual landscape of the project study area by adding the proposed streetcar system, which would include streetcar vehicles, overhead contact systems, and platforms, all of which would be visible to viewer groups in the project study area. These issues will be further evaluated in the EIR/EA.

B. Agriculture and Forestry Resources

An initial screening determined that the proposed project would cause no impact or less-than-significant impacts. (See Appendix A.)

C. Air Quality

The project is located in the South Coast Air Basin (Basin), within the South Coast Air Quality Management District (SCAQMD). The SCAQMD has established standards for air quality constituents generated by construction and by operational activities for such pollutants as ozone (O₃), carbon monoxide (CO), nitrogen oxides (NOₓ), sulfur dioxide (SO₂), and particulate matter (PM). The SCAQMD maintains an extensive air quality monitoring network to measure criteria pollutant concentrations throughout the Basin. The Basin is designated a severe non-attainment area for O₃, a serious non-attainment area for particulate matter less than 10 microns in size (PM₁₀), and a non-attainment area for particulate matter less than 2.5 microns in size (PM₂.₅). The Basin is a maintenance area for CO and nitrogen dioxide (NO₂) and is in attainment for SO₂.

During construction of the proposed project, emissions may be generated by grading activities, construction workers traveling to and from the project site, delivery and hauling of construction supplies and debris, and fuel combustion by on-site construction equipment. Construction emissions would be short-term in nature and would be limited only to the time period when construction activity is taking place. Due to the nature of the project, construction emissions are anticipated to be below SCAQMD thresholds. However, an evaluation is needed to determine if construction related emissions are potentially significant. This issue will be evaluated further in the EIR/EA.

The streetcar system would consist of electric vehicles, and therefore, no operational emissions would result from the streetcar vehicles. However, the streetcar project would result in an increase in electrical use. Accordingly, there is a potential for increased emissions from power plants as a result of operation of the streetcar project. Although the proposed project has the potential to reduce long-term vehicle emissions by reducing traffic, depending upon proposed trip generation and changes to traffic circulation (of the proposed project or alternatives), the proposed project may increase vehicular traffic in the vicinity of the project site. These issues will be further evaluated in the EIR/EA.
D. Biological Resources

The California Department of Fish and Game (CDFG), *California Natural Diversity Database* lists 19 occurrences of species that are federally and/or state listed as endangered or threatened, or a special-status animal or plant species within the Los Angeles topographic quadrangle, as follows:

<table>
<thead>
<tr>
<th>Species</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Burrowing owl (<em>Athene cunicularia</em>)</td>
<td>Species of Special Concern (California Department of Fish and Game)</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Southwestern willow flycatcher (<em>Empidonax traillii extimus</em>)</td>
<td>Endangered (Federal and State)</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Bank Swallow (<em>Riparia riparia</em>)</td>
<td>Threatened (State)</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Least Bell’s vireo (<em>Vireo bellii pusillus</em>)</td>
<td>Endangered (Federal and State)</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Hoary bat (<em>Lasiurus cinereus</em>)</td>
<td>None</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Western mastiff bat (<em>Eumops perotis californicus</em>)</td>
<td>Species of Special Concern (California Department of Fish and Game)</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Big free-tailed bat (<em>Nyctinomops macrotis</em>)</td>
<td>Species of Special Concern (California Department of Fish and Game)</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>American badger (<em>Taxidea taxus</em>)</td>
<td>Species of Special Concern (California Department of Fish and Game)</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Coast horned lizard (<em>Phrynosoma blainvillii</em>)</td>
<td>Species of Special Concern (California Department of Fish and Game)</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Walnut Forest</td>
<td>None</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Los Angeles sunflower (<em>Helianthus nuttallii</em> ssp. <em>parishii</em>)</td>
<td>Presumed extinct</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Greata’s aster (<em>Symphyotrichum greatae</em>)</td>
<td>Rare, threatened, or endangered</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Robinson’s pepper-grass (<em>Lepidium virginicum var. Robinsonii</em>)</td>
<td>Rare, threatened, or endangered</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Davidson’s saltscale (<em>Atriplex serenana</em> var. <em>Davidsonii</em>)</td>
<td>Rare, threatened, or endangered</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Round-leaved filaree (<em>California macrophylla</em>)</td>
<td>Rare, threatened, or endangered</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Parish’s gooseberry (<em>Ribes divaricatum var. parishii</em>)</td>
<td>Presumed extinct</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Prostrate vernal pool navarretia (<em>Navarretia prostrate</em>)</td>
<td>Rare, threatened, or endangered</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Mesa horkelia (<em>Horkelia cuneata var. puberula</em>)</td>
<td>Rare, threatened, or endangered</td>
<td>No habitat on site</td>
</tr>
<tr>
<td>Plummer’s mariposa-lily (<em>Calochortus plummerae</em>)</td>
<td>Plant of limited distribution</td>
<td>No habitat on site</td>
</tr>
</tbody>
</table>

An initial screening determined that the proposed project would cause no impact or less than significant impacts. (see Appendix A)
E. Cultural Resources

The proposed streetcar would travel through some of the oldest areas of Downtown Los Angeles, with numerous historic buildings and landmarks located along the alignment. While the proposed project would be constructed mostly within existing roadways, there is a potential for both direct and indirect impacts to historical resources as a result of construction and operation.

The project area is comprised of existing roadways and other urban land uses; accordingly, construction activities would require excavation of portions of roadways and sidewalks and potential deep excavation in order to construct traction power substations and maintenance facilities. Therefore, there is a potential to encounter unknown archaeological or paleontological resources during project construction. These issues will be evaluated further in the EIR/EA.

F. Geology and Soils

The site is not located within an Alquist-Priolo Special Studies Zone. Thus, the potential for ground surface rupture at the site is considered to be low. However, there is a designated landslide Seismic Hazard Zone adjacent to Hill Street and the northern end of the project alignment is located within a liquefaction Seismic Hazard zone.(Reference: 26)

Known regional faults that could produce significant ground shaking at the site include the Elysian Park Thrust, Hollywood, Raymond, Compton Thrust, Newport-Inglewood, Verdugo, Santa Monica, Sierra Madre, and Whittier Faults, among others. The closest of these are the Elysian Park Thrust, Hollywood, and Raymond Faults; these faults have surface projections of potential rupture area located at distances of approximately one mile, four miles, and four miles from the site, respectively. Given that the project is located in a seismically active region, there is a potential to expose people and structures to risks of loss, injury, or death. In addition, project construction would involve excavation exposing soils to wind or water which may result in soil erosion or loss of topsoil. In general, construction would comply with applicable building codes and requirements pertaining to seismic and soil safety. These issues will be evaluated further in the EIR/EA.

G. Greenhouse Gas Emissions

SCAQMD has recommended a greenhouse gas significance threshold of 10,000 metric tons per year of carbon dioxide equivalent (CO₂) for assessing the significance of a proposed project’s potential GHG emissions. Greenhouse gas emissions may be generated by grading activities, construction workers traveling to and from the project site, delivery and hauling of construction supplies and debris, and fuel combustion by on-site construction equipment. Construction emissions would be short-term in nature
and would be limited only to the time period when construction activity is taking place. An evaluation is needed to determine if construction-related emissions are potentially significant. This issue will be evaluated further in the EIR/EA. Operation would also result in an increase in electrical usage which would generate GHG emissions. The proposed project would also change traffic circulation in the Downtown area, which may result in increased congestion in some locations. This issue will be further evaluated in the EIR/EA.

H. Hazards and Hazardous Materials

Construction activities would be short-term and limited in nature and may involve limited transport, storage, use, or disposal of hazardous materials. Some examples of hazardous materials handling include fueling and servicing construction equipment on-site, and the transport of fuels, lubricating fluids, and solvents. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated. According to the Department of Toxic Substances Control, EnviroStor database, there are five known cleanup sites within the vicinity of the proposed project including two sites operating with a tiered permit for toxic substance treatment adjacent to the project site. If unknown contamination were identified during project construction or a spill were to occur during construction, agencies with jurisdiction would be notified and immediate measures would be taken to ensure the health and safety of the public and workers and to protect the environment. Any excavation, treatment, and/or disposal of contaminated soils would be conducted to the satisfaction of the applicable regulatory agencies, which could include the Los Angeles Fire Department (LAFD), Los Angeles County Fire Department (LACoFD), Los Angeles Regional Water Quality Control Board (LARWQCB) and/or the California Department of Toxic Substances Control (DTSC). Adherence to regulations set forth by local, state, and federal regulatory agencies would reduce the potential for hazardous materials impacts. Operation of the proposed project is not anticipated to involve the routine handling or transport of hazardous materials or waste; however, routine use of fuels, lubricating fluids, and solvents is likely as part of routine maintenance of the streetcar fleet. These issues will be further evaluated in the EIR/EA.

I. Hydrology and Water Quality

An initial screening determined that the proposed project would cause no impact or less than significant impacts. See Appendix A.

J. Land Use and Planning

The project corridor is within the Central City Community Plan area. The land use designations of the properties adjacent to the proposed corridor are composed primarily of high density residential, public facilities, and commercial land uses, with numerous office buildings, regional center commercial, surface parking lots, and retail shops. The zoning designations for the properties adjacent to the proposed corridor include
commercial (C5, C2), open space (OS-1XL), multiple dwelling zone (R5), and public facilities (PF) designations. The proposed project would include construction of a maintenance facility. Three potential sites have been identified. These sites contain commercial land uses. Accordingly, the proposed project would result in a potential change in land use. The proposed improvements are not anticipated to be inconsistent with existing land use policies. Nonetheless, impacts related to the change in land use and consistency with existing land use policies and zoning will be further addressed in the EIR/EA.

K. Mineral Resources

An initial screening determined that the proposed project would cause no impact or less than significant impacts. See Appendix A.

L. Noise

Noise within the vicinity of the project is dominated by traffic noise on Downtown Los Angeles streets. Noise levels in the vicinity of the project would increase during the construction phase. Should construction occur during nighttime hours, this impact could be potentially significant. Analysis of the proposed project’s consistency with local noise ordinances and guidelines based on existing land uses within and surrounding the project corridor will be completed. This issue will be further evaluated in the EIR/EA.

M. Population and Housing

An initial screening determined that the proposed project would cause no impact or less than significant impacts. See Appendix A.

N. Public Services

An initial screening determined that the proposed project would cause no impact or less than significant impacts. See Appendix A.

O. Recreation

An initial screening determined that the proposed project would cause no impact or less than significant impacts. See Appendix A.

P. Transportation/Traffic

Traffic impacts, if any, would be primarily due to changes in circulation patterns or conflicts between streetcars and vehicles, bicyclists or pedestrians. These issues, as well as consistency with the Los Angeles County Congestion Management Program, will be further evaluated in the EIR/EA.
Q. Utilities and Service Systems

An initial screening determined that the proposed project would cause no impact or less than significant impacts. See Appendix A.

R. Mandatory Findings of Significance

Based on the foregoing, it has been determined that:

There is a potential for both direct and indirect impacts to historical resources as a result of construction and operation of the project. Potential impacts associated with the proposed project would not substantially affect the habitat of a wildlife species, cause a species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, affect a rare or endangered species. Construction activities would require excavation of portions of roadways and sidewalks and potential deep excavation in order to construct associated traction power substations and maintenance facilities to support the project; therefore, there is a potential to encounter unknown archaeological or paleontological resources during project construction that may have the potential to eliminate important examples of history or prehistory. These issues will be evaluated further in the EIR/EA.

The proposed project would be constructed primarily within the existing roadway right-of-way. One of the proposed project’s objectives is to encourage revitalization of the area. The proposed project does not involve the construction of habitable structures or the conversion of large tracts of undisturbed land. However, the proposed project could increase traffic congestion and result in increased motor vehicle pollutant emissions. The cumulative impacts of the proposed project will be analyzed further in the EIR/EA.

The proposed project has the potential to degrade the quality of the environment during construction and operation with regard to several resource areas as indicated in Section IV of the Initial Study. The project’s potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals will be further evaluated in the EIR/EA.

Implementation of the proposed project would involve mostly construction impacts, which would be temporary. After construction, there could be operational impacts from the proposed project. This topic will be analyzed further in the EIR/EA.

V. MITIGATION MEASURES

Any applicable mitigation measures are to be identified in the EIR/EA.
VI. NAME OF PREPARER

ICF International
Lee Lisecki, Project Director
Paulette Franco, Project Manager
Namrata Cariapa, Deputy Project Manager
Peter Feldman, Environmental Analyst

VII. DETERMINATION - RECOMMENDED ENVIRONMENTAL DOCUMENTATION

A. Summary

As described in this Initial Study, the environmental factors listed below would be potentially affected by the proposed project and will be further evaluated in the EIR/EA.

- Aesthetics
- Air Quality
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise and Vibration
- Transportation/Traffic

B. Recommended Environmental Documentation

On the basis of this initial evaluation:

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

Prepared By: Namrata Cariapa
Approved By: Gary Lee Moore, P.E.
             City Engineer

By: Jim Doty
    Environmental Affairs Officer
    Environmental Management Group

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APPENDICES

A. Environmental Screening Checklist

VIII. REFERENCES:

The following sources were used in the preparation of this document. Sources not available via the internet are available by appointment for review at the offices of the Bureau of Engineering, 650 South Spring Street, Suite 500, Los Angeles.


34. U.S. Dept. Interior Geological Survey. 7.5-minute Map Series (Topographic). [USGS Quad]


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).

1. AESTHETICS

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: 17 (Thresholds A.1 & A.2)

Explanation: There are no scenic vistas on or in near proximity to the project site.

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: 17 (Thresholds A.1 & E.3), 17(General Plan)

Explanation: Refer to Section IV.A of the Initial Study.

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: 17 (Thresholds A.1 and A.3)

Explanation: Refer to Section IV.A of the Initial Study.

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 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: 17 (Thresholds A.4)

Explanation: New lighting elements would be limited to the minimum levels necessary for safety and would be similar to lighting levels in the project area. The new light fixtures would be designed to prevent spillover. There are no nearby natural areas. Therefore, this will not be further evaluated in the EIR/EA.
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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Reference: 13) 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

Explanation: According to the Farmland Mapping & Monitoring Program mapping for Los Angeles County (2010), there is no designated prime farmland, unique farmland, or farmland of statewide importance in the vicinity of the project. Reference: 4

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 not subject to a Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forestland (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))?

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: 7)

Explanation: There is no forestland, timberland, or timberland zoned Timberland Production on or near the project site.

d) Result in the loss of forestland or conversion of forestland 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 forestland on or near the project site.
Issues

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<td>e) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of farmland, to non-agricultural use?</td>
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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: 17(Thresholds B.1 to B.3), 31(AQMD Handbook)

Explanation: Refer to Section IV.C of the Initial Study.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality 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 (SO2), and particulate matter (PM10) emissions resulting from construction and operation in the South Coast Air Basin. Reference: 17(Thresholds B.1, B.2), 31(AQMD Handbook)

Explanation: Refer to Section IV.C of the Initial Study.

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: 17(Thresholds B.1, B.2), 31(AQMD Handbook)

Explanation: Refer to Section IV.C of the Initial Study.

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: 17 (Thresholds B.1 to B.3)

Explanation: Refer to Section IV.C of the Initial Study.
### Issues

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<tr>
<td>e) Create objectionable odors affecting a substantial number of people?</td>
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**Standard:** During construction, sources of odor are diesel emissions from 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: 17 (Thresholds B.1 & B.2)

**Explanation:** Refer to Section IV.C of the Initial Study.

### 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 regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

**Explanation:** As described in the Initial Study, Section IV.D, the Los Angeles Quadrangle contains 19 occurrences of species that are federally and/or state listed as endangered or threatened. The project is located in a highly urbanized part of the City of Los Angeles. The existing project corridor is sparsely landscaped with street trees lining the roadways along the project alignment. As part of the project, some of this landscaping would be removed. A landscape plan would be prepared and presented to the Department of City Planning for approval. The project site is not suitable habitat for 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. In addition, there are no known locally designated natural communities on the project site or in the project vicinity. The project corridor contains mature trees that have the potential to be used for nesting by migratory birds. However, the proposed project would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season, to ensure that significant impacts to nesting migratory birds would be avoided. Specifically, in accordance with the MBTA, efforts would be made to schedule the removal of mature trees between September and February to avoid the nesting season.

#### 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: 17(Thresholds C)

**Explanation:** The proposed project would not result in the direct removal, filling or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the project vicinity. See explanation for 4(a).
### Issues

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<tr>
<td>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?</td>
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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: 17(Thresholds C), 33(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: 9(BIOS), 17(Thresholds C)

Explanation: No sensitive habitats were identified within the project site or vicinity. The project area is urbanized and heavily used and does not provide significant habitat for wildlife. However, the project corridor contains mature trees that have the potential to be used for nesting by migratory birds. As previously discussed, the proposed project would comply with the MBTA, which regulates vegetation removal during the nesting season, to ensure that significant impacts to nesting migratory birds would be avoided. Specifically, in accordance with the MBTA, efforts would be made to schedule the removal of mature trees between September and February to avoid the nesting season. Therefore, 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: 9 (CDFG), 27(Tree Policy), 28(Urban Forest Program), 25(PW Tree Policy), 17(Thresholds C)

Explanation: The City of Los Angeles has a Native Tree Protection Ordinance that protects native oak species, black walnut, California bay, and California sycamore that measure four inches or more in cumulative diameter, at four and one-half feet above the ground level at the base of the tree. The project corridor includes areas of grass and trees that may potentially provide habitat for sensitive species, especially nesting birds. The proposed project would remove both young and mature trees, including several protected California sycamores and heritage trees. Protected and heritage tree removal will follow the Recreation and Parks Tree Removal Procedure.

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. Reference: 8(CNDDB), 17(Thresholds C)

Explanation: There are no known locally designated natural communities on the site or in the project vicinity; therefore, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan. Accordingly, the proposed project would not result in significant impacts to biological resources.
## Issues

### 5. CULTURAL RESOURCES – Would the project:

| b) | Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5? | No Impact |
| c) | Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | No Impact |
| d) | Disturb any human remains, including those interred outside of formal cemeteries? | No Impact |

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

- Potentially Significant
- Less Than Significant With Mitigation
- Less Than Significant
- No Impact

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: 13(Guidelines 15064.5), 17(Thresholds D.3), 11(CHRIS)

Explanation: Refer to Section IV.E of the Initial Study.

#### 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 that falls under the CEQA Guidelines section cited above. Reference: 13(Guidelines 15064.5), 17(Thresholds D.2), 11(CHRIS)

Explanation: Refer to Section IV.E of the Initial Study.

#### 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: 13(Guidelines 15064.5), 17(Thresholds D.1), 30(Diblee), 11(CHRIS), 20(ZIMAS)

Explanation: Refer to Section IV.E of the Initial Study.

#### 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. Reference: 13(Guidelines 15064.5), 17(Thresholds D.2), 11(CHRIS)

Explanation: Refer to Section IV.E of the Initial Study.

### 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? | No Impact |

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), 17(Thresholds E.1)

Explanation: Refer to Section IV.F of the Initial Study.
Issues

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<th>Potentially Significant Impact</th>
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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: 1917(Thresholds E.1)

Explanation: Refer to Section IV.F of the Initial Study.

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: 26, 17(Thresholds E.1)

Explanation: Refer to Section IV.F of the Initial Study.

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: 26, 17(Thresholds E.1)

Explanation: Refer to Section IV.F of the Initial Study.

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: 17(Thresholds E.2)

Explanation: Refer to Section IV.F of the Initial Study.

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 or that would become unstable as a result of improper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Reference: 26, 17(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?

Explanation: 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.
Issues

| Potentially Significant | Less Than Significant With Mitigation | Less Than Significant | No Impact |

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?

Standard: 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: 17(Thresholds E.3)

Explanation: The project area is served by the City’s wastewater collection, conveyance, and treatment systems. Therefore, no septic tanks or alternative wastewater disposal systems would be used during project operation.

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?

Explanation: Refer to Section IV.G of the Initial Study.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Explanation: Refer to Section IV.G of the Initial Study.

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: 17(Thresholds F.1, F.2)

Explanation: Refer to Section IV.H of the Initial Study.

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: 14(Geotracker), 15(LAMC), 17(Thresholds F.1, F.2)

Explanation: Refer to Section IV.H of the Initial Study.

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 that pose a hazard beyond regulatory thresholds. Reference: 17(Thresholds F.2)

Explanation: There is no school within 0.25 mile of the project. 26(NavigateLA Schools)
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: 17(Thresholds F.2)

   Explanation: Refer to Section IV.H of the Initial Study.

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: 17(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. Reference: 20(ZIMAS)

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: 17(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 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: 17(Thresholds F.1, K.2)

   Explanation: Refer to Section IV.H of the Initial Study.

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: 17(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 that did not meet the quality standards of agencies that regulate surface water quality and water discharge into storm-water drainage systems. Reference: 17(Thresholds G.2)
Issues

Explanation: The proposed project would 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). Short-term impacts to water quality due to construction activities would be regulated under California State Water Resources Control Board Water Quality Order No. 99-08-DWQ (General Construction Permit). Under this permit, the City of Los Angeles would implement a stormwater pollution prevention plan and Best Management Construction Practices would be implemented to ensure no significant impacts to water quality occur during construction.

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 well fields, or adversely change the rate or direction of groundwater flow. Reference: 17(Thresholds G.2, G.3)

Explanation: The proposed streetcar 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 that 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: 17(Thresholds G.1, G.2)

Explanation: The proposed project would not substantially alter the existing drainage pattern of the site or area. No streams or rivers cross the proposed project route. As discussed in Comment 8 (a), the project would result in temporary soil disturbance activities during construction during which time a stormwater 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: 17(Thresholds G.1)

Explanation: The proposed project would not substantially 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 that exceeded the capacity of the storm drain system serving a project site. A significant impact may also occur if the proposed project would substantially increase the probability that polluted runoff would reach the storm drain system. Reference: 17(Thresholds G.2)

Explanation: The proposed project would not change the volume of storm water runoff. See Comment 8(a).

f) Otherwise substantially degrade water quality?

Comment: A significant impact may occur if a project included potential sources of water pollutants and have the potential to substantially degrade water quality. Reference: 17(Thresholds G.3)

Explanation: No new potential sources of pollutants that could substantially degrade water suitability 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: 17(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: 17(Thresholds G.4)

Explanation: The project site is not located within a 100-year flood zone. Reference: 35(FIRM Panel 06037C1620F), 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: 17(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: 17(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?

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: 17(Thresholds H.2)

Explanation: The proposed project would involve the construction and operation of a streetcar service that would traverse the following neighborhoods/districts from north to south: the Civic Center, Bunker Hill, the Historic Core, the Jewelry District, the Financial Core, South Park, and the Los Angeles Sports and Entertainment District (LASED), all of which are located within the Central City Community Plan area of the City of Los Angeles. No changes to the surrounding land uses and no barriers that would divide the community are proposed. Additionally, a goal of the proposed project is to facilitate connections between the surrounding community, private businesses, and public facilities within the different neighborhoods/districts. Therefore, implementation of the proposed project would connect communities rather than divide them. No further analysis is warranted.

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: 17(Thresholds H.1, H.2)

Explanation: See discussion in Section IV. Reference: 20(ZIMAS), 17(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: 17(Thresholds H.1, H.2)

Explanation: Please see the discussion for Item 4(f), above. No impact would occur.

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: 17(General Plan), 17(Thresholds E.4)

Explanation: The project site is not located within a Mineral Resource Zone (MRZ-2), which indicates the inclusion of known mineral deposits. As described in the Conservation Element of the City of Los Angeles General Plan, the primary mineral resources within the city are rock, gravel, oil, and sand deposits, and the only available deposit site within the city is the Tujunga alluvial fan, which is more than 10 miles from the project site. The project site is not located within an area known to contain mineral resources, and no impacts with respect to mineral resources would occur as a result of construction and operation of the proposed project. No further analysis is warranted.
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. Reference: 17(General Plan), 17(Thresholds E.4)

Explanation: As discussed in Item 11(a), the proposed project site is not located within a locally important mineral resource discovery site delineated in the General Plan. Therefore, no further analysis is warranted.

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: 17 (General Plan Noise Element), 17(Thresholds Section I)

Explanation: Noise levels in the vicinity of the project would increase during the construction phase of the proposed project. Should construction occur during nighttime hours, this impact could be potentially significant. However, the Bureau of Engineering Standard Project Specifications for public works construction are designed to comply with the City’s General Plan Noise Element and related Municipal Code Noise Ordinance and, given that the proposed project would be implemented in accordance with these, significant adverse impacts to noise levels are not expected. Nonetheless, this will be analyzed in the EIR/EA.

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: 17 (General Plan Noise Element), 17(Thresholds Section I)

Explanation: See also comment under Section 11(a). Increased groundborne vibration or groundborne noise levels within the vicinity of the proposed project could occur during the construction phase from use of heavy equipment. These impacts would be temporary and short-term in nature and would comply with applicable noise standards.

Given the proximity of nearby noise-sensitive uses, such as residences, to the project site, operation of the proposed project alternatives has the potential to expose persons to or generate excessive groundborne vibration or noise levels. This impact is considered to be potentially significant and will be analyzed in the EIR/EA.

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: 17 (General Plan Noise Element), 17(Thresholds Section I)
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Explanation: Refer to discussion under 11 (a) above. Operation of the proposed project has the potential to increase noise as a result of streetcar vehicle operation and due to changes in traffic circulation that may increase ambient noise at nearby sensitive receptors depending upon the locations of potential traffic congestion impacts. This impact is considered to be potentially significant and will be analyzed in the EIR/EA.

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 temporary or periodic increase in the ambient noise levels in the project vicinity above levels existing without the proposed project. Reference: 17 (General Plan Noise Element), 17(Thresholds Section I)

Explanation: Refer to discussion under Comment 11 (a) above. Construction of the proposed project would involve the use of noise-generating construction equipment, resulting in temporary and periodic increases in noise levels along the proposed project corridor. This impact is considered to be potentially significant and will be analyzed in the EIR/EA.

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: 17(Thresholds Section I), 26(NavigateLA)

Explanation: The project is not located within two miles of an airport. The nearest airport to the project site is Bob Hope Airport, located approximately 10 miles northwest of the site (Google Earth Pro 2012). The project site is not located within an airport land use plan or within 2 miles of an airport land use plan, public airport, or public use airport; therefore, no further analysis is warranted.

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: 17(Thresholds Section I), 26(NavigateLA)

Explanation: See Item 12(e). No private airstrips are located in the project vicinity. Thus, no one residing or working in the project area would be exposed to excessive noise levels associated with a private airstrip. No further analysis is warranted.

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: 17(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 would involve the construction and operation of a streetcar service. The project would not include the construction of homes or businesses. Therefore, the proposed project would not directly increase the project area’s population. The proposed project would not involve changing the City’s land use and planning designations to a more intense use and, therefore, would not directly induce substantial population growth. However, an objective of the project is to encourage revitalization of the area through pedestrian friendly improvements and, therefore, the project could
indirectly induce business development and population growth. This indirect effect, however, is expected to be less than significant. No further analysis is warranted.

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: 17(Thresholds J.1 and J.2)

Explanation: The proposed project would involve the construction and operation of a streetcar system. It would not displace any existing housing. Therefore, no further analysis is warranted.

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. Reference: 17(Thresholds J.2)

Explanation: The proposed project would not displace any housing. No businesses or residences are proposed to be demolished or displaced by the proposed project. Therefore, no further analysis is warranted.

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: 17(Thresholds K.2)

Explanation: The project site is served by LAFD Division 1, Battalion 1 at Station No. 3, located at 108 North Fremont Avenue, approximately 0.4 miles to the west. The proposed project would not result in an increase in population and, thus, would not generate a need for new or altered fire protection facilities. 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 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. Construction and operation of the proposed project would not create hazards that would increase the need for fire protection. Therefore, less-than-significant impacts would occur. No further analysis is warranted.

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: 17(Thresholds K.1)

Explanation: The project site is served by LAPD’s Central division, Central Community Police Station,
located at 251 E. 6th Street. 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. Construction and operation of the proposed project would not increase the need for police services. No residential, commercial, industrial, or recreational land uses are proposed as part of the project. Therefore, less-than-significant impacts would occur. No further analysis is warranted.

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: 17(Thresholds K.3)

Explanation: The proposed project does not include a housing component, and it would not directly increase employment. The proposed project would not include new housing and, therefore, would not directly increase the demand for schools in the area. However, an objective of the project is to encourage revitalization of the area and, therefore, the project could indirectly induce business development and population growth. This indirect effect on school enrollment, however, is expected to be less than significant. No further analysis is warranted.

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: 17(Thresholds K.4)

Explanation: The proposed project would not directly increase the demand for parks in the area because it would not include new residential or business development. However, a primary objective of the project is to encourage revitalization of the area, which could induce new development and indirectly increase project area populations. However, the indirect impacts on parks due to increased populations are not expected to be significant, because the increase in population would be on a regional level and would not result in substantial increase in park use in the Downtown area. A less-than-significant impact would result from construction and operation of the proposed project. No further analysis is warranted.

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: 17(Thresholds K.5)

Explanation: The project would not result in a net increase of 75 residential units or more. The proposed project would not directly increase the use of other facilities in the area because it would not include new residential or business development. However, a primary objective of the project is to encourage revitalization of the area, which could induce new development and indirectly increase project area populations. However, the increased populations are not expected to have a significant impact on other public facilities. A less-than-significant would result from construction and operation of the proposed project. No further analysis is warranted.
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: 17(Thresholds K.4)

Explanation: The proposed project would not cause a direct population increase (see Section 13 above). The proposed project would involve the construction and operation of a streetcar system. The proposed project would not directly increase the use of existing neighborhood parks or regional parks such that substantial physical deterioration of the facility would occur or be accelerated. No further analysis is warranted.

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: Reference: 17(Thresholds K.4)

Explanation: The proposed project does not include or require a recreational facility. One of the goals of the proposed project is to improve connectivity to recreational facilities restaurants, and shops. The creation of connective transit corridors would facilitate access to existing facilities. No further analysis is warranted.

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 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: 17(Thresholds L.1 to L.4, L.8)

Explanation: The proposed project could change Downtown circulation patterns, which could result in localized traffic impacts. This issue will be addressed in the EIR/EA.

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: 17(Thresholds L.1 to L3)

Explanation: Construction of the proposed project would temporarily increase traffic due to additional trips to and from the site involving haul trucks, construction equipment, and personal vehicles. These vehicle trips are directly related to construction activities and are temporary in nature.

Please see Item 16.(a) above.
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: The nearest airport to the project site is the Bob Hope Airport, located approximately 10 miles northwest of the site (Google Earth Pro 2012). The proposed project does not include any components that would affect air traffic. The proposed project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that would result in substantial safety risks. Therefore, no further analysis is warranted.

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: 17(Thresholds L.5)

Explanation: Introduction of the streetcar system may introduce safety hazards to pedestrians, personnel, visitors, nearby neighbors, bicyclists, or other vehicles. Driveway access and the circulation scheme for the proposed project would need to be reviewed and approved by the City of Los Angeles, Department of Transportation. The impact is considered to be potentially significant and will be addressed in the EIR/EA.

e) Result in inadequate emergency access?

Standard: A significant impact may occur if the proposed project resulted in inadequate emergency access. Reference: 17(Thresholds L.5, L.8, and J2)

Explanation: The proposed project may intermittently result in diminished access for emergency vehicles during construction. However, the construction phase of the project would be temporary. The City will implement traffic control plans in areas where construction is occurring to accommodate first responders and emergency vehicles so that emergency access is not substantially impaired. Temporary traffic control elements would be subject to review, including safety, and approval by Los Angeles Department of Transportation. With compliance to existing regulations, the potential impact is considered to be less than significant. Therefore, no further analysis is warranted.

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 17(Thresholds L.6)

Explanation: The proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation, including the City of Los Angeles Bicycle Plan. Therefore, no impact would occur.

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: 17(Thresholds M.2)
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Explanation: The proposed project would not generate additional wastewater. The proposed project would involve the construction of a streetcar system. No uses or activities that would generate wastewater requiring wastewater treatment are proposed as part of the project. The proposed project would have no impact on the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board. Therefore, no impacts would occur. No further analysis is warranted.

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: 17(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. The proposed project would involve the construction of a streetcar system. The proposed project would not use water in amounts that would have a significant impact on water treatment facilities. A minimal amount of additional water would be used for irrigation of new landscaping, as well as cleaning, servicing, and maintenance of the streetcar vehicles. The proposed project would not include new or expanded water or wastewater treatment facilities. In addition, the project would not require the construction or expansion of water or wastewater treatment facilities. Therefore, no impacts would occur. No further analysis is warranted.

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?

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: 17(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. The project site is in an urbanized area that is adequately served by the existing storm drain system. Operation of the proposed project alternatives would not create substantial amounts of additional runoff that would require construction of new stormwater drainage facilities or the expansion of existing facilities. Therefore, no impacts would occur. No further analysis is warranted.

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: 17(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. Construction and operation of the proposed project would not require new or expanded entitlements. The proposed project would involve the construction and operation of streetcar service and would not involve the construction of water wells or adversely affect ground water supply. The proposed project would not use any water, except for irrigation of landscaping improvements, and cleaning, servicing, maintenance of the streetcar vehicles, which would be a minimal amount. As a result, the minimal increase in demand for water would not exceed existing water supplies. Therefore, no impacts would occur. No further analysis is warranted.
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<th>No Impact</th>
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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: See 17 (a) above. Construction and operation of the proposed project would not directly increase the demand for wastewater treatment facilities in the area. The proposed project would not include uses or activities that would generate wastewater requiring treatment. Therefore, no impacts would occur. No further analysis is warranted.

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: 17(Thresholds M.3), 29(Countywide Siting Report)

Explanation: The City standard for public works projects requires demolition debris to be recycled where feasible; therefore, impacts associated with construction debris would be less than significant. Operation of the proposed project may generate minor amounts of solid waste during cleaning, servicing, and maintenance of the streetcar vehicles, but those small amounts would be recycled or disposed of in existing landfills. Adequate landfill capacity exists to accommodate project-generated waste. If disposal would occur at an off-site location, it would be disposed of in accordance with the City of Los Angeles’ regulations. Therefore, through compliance with the applicable regulations, impacts on solid waste disposal needs would be less than significant as a result of the proposed project and no further analysis is warranted.

g) Comply with federal, state, and local statutes and 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: 17(Thresholds M.3), 29(Countywide Siting Report)

Explanation: The project will be designed, constructed and operated in accordance with all applicable laws, regulations, ordinances, and formally adopted City standards. Disposal of all solid waste generated by the proposed project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, no further analysis is warranted.
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?

Explanation: While the proposed project is a transportation project that would be constructed mostly within existing roadways, there is a potential for both direct and indirect impacts to historical resources as a result of construction and operation of the project. Potential impacts associated with the proposed project would not substantially affect the habitat of a wildlife species, cause a species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, affect a rare or endangered species. Construction activities would require excavation of portions of roadways and sidewalks and potential deep excavation in order to construct associated traction power substations and maintenance facilities to support the project; therefore, there is a potential to encounter unknown archaeological or paleontological resources during project construction that may have the potential to eliminate important examples of history or prehistory. These issues will be evaluated further in the EIR/EA.

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)?

Explanation: As discussed throughout this Initial Study, the proposed project has the potential to result in environmental impacts during construction and operation in several resource categories. In addition, other related projects in the vicinity of the streetcar alignment may also result in environmental impacts. As such, there is a potential for the proposed project to combine with the other related projects to result in a cumulative impact. Therefore, the cumulative impacts of the proposed project and related projects will be analyzed further in the EIR/EA.

c) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Explanation: The proposed project has the potential to degrade the quality of the environment during construction and operation with regard to several resource areas as indicated in Section IV of the Initial Study. The project’s potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals will be further evaluated in the EIR/EA.

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

Explanation: Implementation of the proposed project would involve mostly construction impacts, which would be temporary. After construction, there could be operational impacts from the proposed project. This topic will be analyzed further in the EIR/EA.