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RE: Addendum to Mitigated Negative Declaration (CF#18-0937);
1925 North Marianna Avenue and 4671 Worth Street

Pursuant to Section 15164 of the State of California Environmental Quality Act (CEQA) Guidelines, the Department of City Planning has issued an Addendum (Reconsideration) of the previously adopted Mitigated Negative Declaration (CF#18-0937), which was previously published with the following project description:

"The project involves the subdivision of a 6.6-acre lot located at the northwest corner of the Marianna Avenue and Worth Street. This lot will be subdivided to accommodate two projects. However, this Initial Study/Mitigated Negative Declaration (IS/MND) will only analyze the subdivision of the site and the construction of an approximately 80,000 square-foot warehouse within one of the two newly created parcels.

The warehouse will be constructed within a 128,118 square-foot (2.94-acre) site that has frontage on both Marianna Avenue and Worth Street. This building will contain three components, a larger warehouse, separate office space for Los Angeles Police Department (LAPD) evidence employees, and a separate office space for CATS (Commercial Auto Theft). A total of 237 parking spaces will be provided for the project. Access will be provided by two driveway connections along the north side of Worth Street and a ramp connection along the west side of Marianna Avenue."
The project was assessed in Mitigated Negative Declaration (CF#18-0937), adopted on December 5, 2018 for a four-story, the subdivision of the site and the construction of an approximately 80,000 square-foot warehouse within one of the two newly created parcels. The MND identified potential impacts related to: Air Quality (Demolition, Grading, and Construction Activities), Biological Resources (Nesting of Birds), Hazards and Hazardous Materials (Existing Toxic/Hazardous Construction Materials), Noise (Demolition, Grading, and Construction Activities), Transportation (Line of Sight and Construction Vehicles), and Tribal Cultural Resources (Tribal Monitor and Consultant and Archeological Resources). For the reasons set forth in the original MND (CF#18-0937), it was determined that the project, as originally proposed, would not have a significant effect on the environment with mitigation. On October 11, 2018, the Department of Public Works, Bureau of Engineering acted as the lead agency for the project and prepared the MND for the proposed Los Angeles Police Department (LAPD) Evidence Warehouse. At its regular meeting held on November 13, 2018, the Information, Technology, and General Services Committee considered MFC reports relative to approving the California Environmental Quality Act analysis and authorizing the GSD to negotiate and execute a PSA with 1925 North Marianna, LLC, to acquire land and Design-Build a warehouse for the LAPD's property division and CATS. On December 5, 2018, the MND was adopted by City Council (CF#18-0937). The determination letters for DIR-2019-1059-SPR and AA-2019-1058-PMLA were issued on May 24, 2019 which involved the approval of Site Plan Review for the construction, use, and maintenance of a new one-story, approximately 80,000 square-foot warehouse in the MR1-1 Zone and the merger and resubdivision of one lot into two parcels in conjunction with the construction of the warehouse, respectively. This action involved finding the project adequately assessed in MND (CF#18-0937), adopted on December 5, 2018, without the need of any subsequent EIR, negative declaration, or addendum.

PROJECT REVISION

Subsequent to the adoption of the MND (CF#18-0937) and issuance of the land use determination letter (DIR-2019-1059-SPR), the applicant, on October 3, 2019, requested that an Addendum to the MND (CF#18-0937) be prepared in conjunction with a request to increase the maximum permitted height from 44 feet to 60 feet. This change was requested in order to meet the LAPD requirements for a 30-foot height interior warehouse space, the need for vertical circulation within the warehouse building, and to comply with the LAMC definitions for height of building and grade per LAMC Section 12.03. This is a slight change (net height increase of 16 feet) from the adopted MND which analyzed the proposal of a 44-foot warehouse.

The building envelope is not changing; rather, the way the building height is to be measured (from the lowest adjacent grade point) has been corrected. Since the time of the approval and during plan check, the exterior elevation concept has been completed and an elevator company was consulted to determine the height required for an elevator penthouse. Based on the building configuration and the number of stops required for the elevator, the tallest parapet at the elevator penthouse is required to be 52 feet above the building's finished floor. The site slopes downward in a southwesterly direction. The change in elevation from the northeast corner to the southwest corner is approximately 15 feet. According to the LAMC definitions for height of building and grade per LAMC Section 12.03, the building would not comply with Condition No. 4 of DIR-2019-1059-SPR requiring a maximum height of 44 feet. In fact, since the implementation of the proposed final grading plan concept, the lowest grade point within 5 feet of the building is approximately 6 feet and 9 inches below the finish floor at the southwest corner of the building. Due to this, the actual height of the building per the LAMC would be approximately 58 feet and 9 inches. Further, the interior reconfiguration to the building does not impact the overall exterior height of the building from the original project description. Per the MR1-1 Zone, there is no building height limit for the proposed project. Per LAMC Section 12.21.1-B.3, there are rooftop exceptions which are not
counted towards building height, such as parapets, any roof structure housing stairways, elevators, and other architectural features to which the new measurement is being taken from. No other aspects of the previously adopted environmental project description will be changed.

The requested change to the method for evaluating the height of the project does not constitute changes that would require major revision to the previously adopted MND as this change does not constitute any new or increased impacts as it does not change the approved development project as no other aspects of the previously adopted environmental project description will be changed. Changes to the proposed project related to the height evaluation method are analyzed below.

REGULATORY FRAMEWORK

This addendum analyzes the proposed project's revisions as required under the CEQA Guidelines Sections 15162 and 15164.

Under CEQA Guidelines Section 15164, an addendum to an adopted negative declaration shall be prepared only if minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent Environmental Impact Report or negative declaration have occurred. Under Section 15162, the lead agency shall prepare an EIR if there are any new significant environmental effects associated with the refined project. With respect to the proposed project, the revision is only a minor additional request that does result in any new significant environmental impacts; therefore the revised project does not require an EIR.

ENVIRONMENTAL ANALYSIS

1. Aesthetics

The request to allow for an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not change the conclusion of the adopted MND. The proposed reconfiguration of the site plan and building elevations to accommodate the proposed 60-foot maximum height will not change the building envelope. The proposed building will maintain the same use, massing, and architectural design. Additionally, the required and conditioned landscape buffer along any areas fronting along North Marianna Avenue and Worth Street, will be maintained. Street trees that will be removed along the west side of North Marianna Avenue will be replaced pursuant to the Department of Public Works, Urban Forestry Division. Landscaping surrounding the building site, breaks in the building plane, and articulation all serve to break up the massing of the building to be more compatible with the surrounding neighborhood. Therefore, the revised project will have no effect on aesthetics and the same impact conclusions and mitigation measures would apply. As a result, no new mitigation is required.

2. Agricultural and Forestry Resources

The request to allow for an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. Agricultural and forestry resources have previously been analyzed and found to have no impact at the project site, and no features of the project that would impact agricultural and forestry resources are changing. There are multiple mature trees located along the North Marianna Avenue right-of-way. All of the trees are of the same species (eucalyptus trees), which are not a protected species. These street trees will be removed and replaced to accommodate the proposed project. Even though these trees are not "protected trees," their removal is contingent upon the attainment of a Tree Removal
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Permit pursuant to the Department of Public Works, Urban Forestry Division and the trees will be replaced following the construction of the facilities during the landscaping and finishing phase, pursuant to conditions in said permit. Therefore, the revised height evaluation method would have no effect on agriculture and forestry resources as no such resources exist on site. As a result, no new mitigation is required.

3. Air Quality

The request to allow for an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. Construction impacts on air quality have previously been analyzed and found that the proposed project will not result in significant air quality impacts with the implementation of a mitigation measure. Additionally, a Health Risk Screening was completed in September 1, 2017 to examine the degree to which the proposed project may result in significant environmental impacts with respect to air quality. The MND's air quality analysis concluded that the proposed project does not have the potential to conflict with or obstruct implementation of the applicable air quality plan, to violate an adopted air quality standard or contribute substantially to an existing or projected air quality violation, to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designed to be in non-attainment, to expose sensitive receptors to substantial pollutant concentrations, or to create objectionable odors affecting a substantial number of people. Further, it determined that the proposed project's air quality impacts would not exceed the regional and localized air quality thresholds. Therefore, environmental impacts will be less than significant with the existing mitigation measure. As a result, no additional mitigation is required.

4. Biological Resources

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. The additional request will not require the removal of any trees or habitat beyond what was analyzed in the adopted MND. There are multiple mature trees located along the North Marianna Avenue right-of-way. All of the trees are of the same species (eucalyptus trees), which are not a protected species. These street trees will be removed and replaced to accommodate the proposed project. Even though these trees are not "protected trees," their removal is contingent upon the attainment of a Tree Removal Permit pursuant to the Department of Public Works, Urban Forestry Division and the trees will be replaced following the construction of the facilities during the landscaping and finishing phase, pursuant to conditions in said permit. The removal of vegetation on site and disturbances to the ground may result in take of nesting native avian species. The analysis of biological resources impacts indicated that the proposed project may have the potential to impact nesting avian species. The project's implementation will require the removal of the mature street trees located adjacent to the project site's eastern property line along the west side of North Marianna Avenue. Avian species may be present within these trees during the migratory bird nesting season. Therefore, a mitigation measure was required to ensure a qualified biologist conducts preconstruction surveys for nesting birds up to 14 days before the construction activities commence and procedural indications in case habitat modification would apply to the proposed project. The revised project will continue to be conditioned by the exiting mitigation measure and no new impacts on biological resources will result from the revised height evaluation method. As a result, no additional mitigation is required.
5. Cultural Resources

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. The site location is not listed as having potential archaeological resources, paleontological resources, or human remains on-site. The implementation of the proposed project will not affect a historic structure as the site is vacant and undeveloped. The site was previously occupied by Castrol, Inc., a manufacturer of lubricants. Operations ceased in 1995 and since then, all of the structures located on-site were razed. Therefore, the project will not affect any historic structure since the site is undeveloped. A search through the California Office of Historic Preservation, California Historical Resources database indicated that the project site does not contain any historic structures listed in the National or California Registrar. In addition, the City of Los Angeles maintains a Historic-Cultural Monument List, which includes 1,104 City designated historic resources. The project site is not identified on the list of City designated historic resources. Since the project will not affect any local, state, or federally designated historic structure, no impacts will occur. Further, cultural resources have previously been analyzed and found to be less than significant at the project site, and no features of the project that would impact cultural resources are changing. Therefore, the revised project will have no effect on cultural resources. If any such resources are discovered during excavation, the project will continue to be required to adhere to any and all applicable California Public Resource Sections and California Health and Safety Code Sections. As a result, no new mitigation is required.

6. Geology and Soils

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. The proposed revision to the plans to accommodate the proposed 60-foot height will not involve the addition of any other floor area. The proposed building will maintain the same use, massing, and architectural design. It will not require additional grading and excavation beyond what was originally analyzed in the adopted MND. In addition, the site slopes downward in a southwesterly direction. The change in elevation from the northeast corner to the southwest corner is approximately 15 feet. The project applicant will rebalance the site by introducing denser fill that will be capable of supporting the new warehouse. The amount of fill that will be imported and exported off-site is not yet known. Reinforced steel support beams may be installed within the concrete slab foundation to prevent collapse. Nevertheless, the addition of new fill will reduce the site's liquefaction risk and no mitigation is required. The project will be continue to be required to submit a geotechnical report to the Los Angeles Building and Safety for review and approval prior to the issuance of grading or building permits. Therefore, the revised project will have no effect on geology and soils. As a result, no new mitigation is required.

7. Greenhouse Gas Emissions

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. Though the project is increasing the height of the building proposed to 60 feet in lieu of the analyzed 44 feet, the structure will maintain the same use, massing, and architectural design. Greenhouse gas emissions have previously been analyzed and found to be less than significant at the project site, and no features of the project that would impact greenhouse gas emissions are changing. Further, the proposed project's design features and compliance with regulatory measures would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the LA Green Building Code, and CARB's 2017 Scoping Plan aimed at
achieving 40 percent below 1990 GHG emission levels by 2030. Therefore, the revised project will have no effect on greenhouse gas emissions. As a result, no new mitigation is required.

8. Hazards and Hazardous Materials

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. Matrix New World Engineering, Inc. (Matrix) performed a Phase I Environmental Site Assessment (ESA) for the project site in 2015 to document the environmental conditions at the project site. A limited Phase II Environmental Site Assessment was conducted by Nino and Moore in March 2019 at the project. The following findings and recommendations were made:

Findings

- The underground storage tank (UST) survey conducted on the western portion of the site revealed buried debris in the northeastern corner of the western half of the site. Discrete scattered anomalies were also observed in the western portion of the site that appeared to be buried vaults, metallic debris or reinforced concrete pads. These anomalies were specifically identified on northwest and southern areas of western portion of the site.

- Concentrations of volatile organic compounds (VOCs) were not detected above the practical quantitation limit (PQL) in the soil samples analyzed.

- Concentrations of diesel range organics (DROs) were reported as exceeding the Environmental Protection Agency (EPA) Regional Screening Levels (RSL) in soil samples B6-7 and B8-5. Concentrations of oil range organics (OROs) were reported below the EPA RSL.

- Detectable concentrations of several Title 22 Metals were reported in the soil samples analyzed, but at concentrations below their respective screening levels, except for samples B8-1 and B10-1' which reported concentrations of 5,000 mg/kg lead (B8-1) and 63 mg/kg arsenic and 67 mg/kg lead (B10-1'), respectively. As discussed earlier, sample B8-1 represents material characterized as California Hazardous waste since it exceeded the total threshold limit concentration (TTLC) of 1,000 mg/kg. The lateral and vertical extent of lead impacted soil around borings B8 and B10 has not been defined.

- Detectable concentrations of semi volatile organic compounds (SVOCs), polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs) were reported in the soil samples analyzed but at concentrations below their respective screening levels.

- Concentrations of several VOCs were detected in soil vapor samples but at levels below regulatory screening levels.

- Based on the results of this Limited Phase II ESA, vapor intrusion is not anticipated to be a concern at the site based on a Commercial/Industrial land use planned for the site.

Conclusions

- Soil in the vicinity of soil borings B8, from surface to approximately 1.5 feet, should be considered California hazardous waste if disturbed. The lateral and vertical extent of lead impacted soil around borings B8 and B10 has not been defined and should be investigated to a depth of about 15 feet below ground surface (bgs). It is possible that shallow soil in
other portions of the site may also be impacted by elevated concentrations of metals requiring special handling and disposal requirements per local, state, and federal laws.

- The lateral and vertical extent of total petroleum hydrocarbon (TPH) DRO impacted soil around borings B3, B6, and B8 has not been defined and should be investigated further.

- Further assessment for soil vapor is not recommended at the present time.

- Buried debris and other anomalies, possibly vaults or other underground structures, exist on site. Prior to construction, the eastern half of the site should be surveyed for buried anomalies and USTs by conducting a geophysical survey.

- Additional excavation of areas where anomalies were observed during the UST survey on the western part of the site, should be conducted to confirm presence of buried USTs.

- The results of this Limited Phase II ESA should be forwarded to the contractor who will be responsible for grading, structural/geotechnical engineering, and other earthmoving services at the site for the proposed development.

- All work performed on site shall be done in accordance with a land use covenant (LUC) and Deed Restriction between the property owner and the California Department of Toxic Substances Control (DTSC) recorded on May 30, 2006. If the monitoring procedures indicate the possible presence of contaminated soil, a contaminated soil contingency plan should be implemented and should include procedures for segregation, sampling, chemical analysis, and disposal of contaminated soil as required by all applicable laws. Contaminated soil will be profiled for disposal and will be transported with appropriate hazardous or non-hazardous waste manifests by a state-certified hazardous material hauler to a state-certified disposal or recycling facility licensed to accept and treat the type of waste indicated by the profiling process. The contaminated soil contingency plan should be developed and in place during construction activities. In the event that these processes generate any contaminated groundwater that should be disposed of outside of the dewatering/National Pollutant Discharge Elimination System process, the groundwater should be profiled, manifested, hauled, and disposed in a similar manner.

Despite Nino & Moore's recommendation, further site investigation was not pursued by the City. The previously adopted mitigation measures relating to hazards and hazardous materials will continue to apply to the project. Per Mitigation Measure No. 3:

In the event remediation of any contamination on the land and/or the adjacent development property is necessary for the Applicant to construct and complete the project for the intended future use of the project, as specified in Section 6.1.1 of the Purchase and Sale agreement, such remediation shall not be considered a Buyer-proposed Change Order, and the Applicant (Seller), at its cost and expense, shall be solely responsible for such remediation work in connection with the construction of the project, which shall be diligently completed in compliance with all applicable regulations and requirements in all material respects and shall receive all applicable regulatory sign-off prior to closing. Any required remediation shall have an associated soil management plan (SMP), a remedial action plan (RAP), and human health risk assessment (HHRA) prepared. Contaminants to be remediated upon discovery include but are not limited to: Volatile Organic Compounds (VOCs) in soil and soil gas as well as Polycyclic Aromatic Hydrocarbons (in soil), Semi Volatile Organic Compounds (in soil),
Polychlorinated Biphenyls (in soil), metals (in soil), and total petroleum hydrocarbons (in soil). In the event other contaminants are encountered in soil, soil gas, or groundwater during construction or during the City's Phase II sub-surface investigation, those contaminants shall be remediated to appropriate thresholds. A contingency plan for identifying, handling, and disposing of contaminated material shall be in accordance with applicable laws, regulations, ordinances, and formally adopted City standards. The plan describes measures that apply to handling and disposing of stained or hydrocarbon-contaminated and other contaminated soils should they be encountered during site excavations. These measures will reduce hazards to people or the environment from exposure to hazardous materials to a less-than-significant level. Specifically, the plan shall address, but not be limited to, the following:

- **Excavation of Contaminated Soils**

  - The soils that have visible staining or an odor must be tested in the field by the contractor or qualified environmental subcontractor with an organic vapor analyzer (OVA) for volatile components, which require additional considerations in their handling. Soils with OVA readings exceeding 50 parts per million (ppm) volatile organic compounds (probe held 3 inches from the excavated soil face), or that are visibly stained or have a detectable petrochemical odor should be stockpiled by the Contractor separately from uncontaminated soils. The stockpiles should be barricaded near the excavation area, away from drainage areas or catch basins, on an impermeable plastic liner (6 millimeter nominal thickness and tested at 100 psi strength). Caution must be taken to separate any contaminated soil from the remainder of the excavated material. If only a small amount of contaminated soil is encountered, it may be drummed in 55-gallon steel drums with sealing lids. The soil will then be sampled in a random and representative manner. To establish waste classification, samples will then be analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH), volatile organics (VOC), Semi-volatile Organic Compounds, Title 22 heavy metals, reactivity (pH), corrosivity, and toxicity. The number of samples will depend on the volume of material removed, one sample for approximately every ton of soil. Storage space available at the site and neighborhood sensitivity will determine the amount of soil that can be stockpiled.

  - If volatile compounds are present at concentrations exceeding 50 ppm, an South Coast Air Quality Management District (AQMD) permit will be required, which most likely will require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution. The Contractor shall obtain all permits.

  - Suspected contaminated soil samples can be taken to a State-certified environmental laboratory or tested in the field with a mobile lab and technician using infrared spectrometry with EPA Method 1664 for TRPH. Materials with elevated levels of TRPH, metals or other regulated contaminants will require handling by
workers who have been adequately trained for health and safety aspects of hazardous material handling.

- **Removal and Classification of Excavated Soil**
  
  - Any contaminated material (soil, asphalt, brick, burned material, concrete, or debris) that is to be hauled off the site is considered a "waste product" and must be classified as hazardous or nonhazardous waste under all criteria by both state and federal Codes prior to disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest will prepared by the Contractor or its qualified representative and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels that can be returned to the excavation, a less costly nonhazardous transporter and soil recycling facility may be used if no hazardous constituents are present above their respective action levels.

  - Currently, there are no established regulatory limits or threshold values whereby soil with TRPH only can be classified as hazardous, although the California Code of Regulations (CCR) Title 22 provides limits for the volatile hydrocarbon constituents (including solvents), PCBs, and metals. Therefore, until new criteria are released by the state or federal agencies, soil levels of 100 ppm TRPH (crude oil, waste oil, and diesel), 10 ppm gasoline, and 1/50/50/50/ppm benzene, toluene, ethylbenzene and xylenes, respectively, are proposed. Soil contaminated with hydrocarbons at values less than these values may be backfilled, used for fill, or paved over. A soil recycling facility should accept the material containing TRPH, assuming it is not hazardous due to metals or other contaminants.

  - Depending on the results of the sampling, this soil material is recycled into building foundation material, road pavement, landfill cover, etc. A Class III (municipal) landfill may also accept soils with only TRPH contamination above 1,000 mg/Kg at the facility's discretion, but below certain levels specified by the Los Angeles Regional Water Quality Control Board, upon approval of an application (Report of Waste Discharge) with that agency. All excavated material moved off site must be manifested, transported by a registered hauler, and disposed of in the proper class landfill or recycler. These facilities can be contacted ahead of time regarding their acceptance of SVOCs.

- **Health and Safety Issues**

  - The contractor shall be licensed for hazardous materials handling and hauling or have a qualified licensed subcontractor on call. The workers exposed to or handling contaminated soils shall have sufficient health and safety training, consistent with Occupational Safety and Health Administration (OSHA) Hazardous Waste Operation
The contractor, qualified subcontractor or an industrial hygienist shall prepare a site-specific health and safety plan. The plan shall appoint a site safety officer and establish responses (but not limited to) to heavy metals, solvents, SVOCs, and petroleum hydrocarbons that may be encountered during excavations. Trapped pockets of methane and hydrogen sulfide gas and areas of low oxygen are common in excavations of this area, and are usually mitigated in confined excavations with proper monitoring and ventilation. The plan should specify particular action levels for each contaminant found during exploratory drilling and suspected to occur along the alignment and provide guidelines for personal safety and public protection, including monitoring and appropriate personal protective equipment needed on the jobsite during all phases of excavation of the project. The responsibility for maintenance and calibration of monitoring gear should be specified. The goal is to prevent health-significant inhalation and dermal exposure to hydrocarbon SVOC- or metal-contaminated soils, explosions, and fires and to provide methods of decontaminating workers and equipment if contamination levels exceed those cited in the plan. Preventing unauthorized entry into the work and stockpile areas shall be included.

This mitigation measure remains adequate to address the hazards and hazardous materials at the project. No features of the project that would impact hazards are changing. Therefore, the revised project will have no additional effect on hazards and hazardous materials. As a result, no new mitigation is required.

9. Hydrology and Water Quality

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. Impacts to hydrology and water quality have previously been analyzed and have been found to be less than significant at the project site. No features of the project that would impact hydrology and water quality are changing with the new height evaluation method. The potential impacts on stormwater runoff/pollution and flooding/tidal waves will continue to be mitigated by compliance with existing Standard Urban Stormwater Mitigation Plan requirements which impose rainwater Low Impact Development (LID) strategies on projects that require building permits and through compliance with the requirements of the Flood Hazard Management Specific Plan, adopted under Ordinance No. 172,081. Therefore, the revised project will have no effect on hydrology and water quality. As a result, no new mitigation is required.

10. Land Use Planning

The request allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. The density, height, and scale of the overall development is permitted in the MR1-1 Zone. No impacts related to land use and planning are anticipated to occur. The project's density and building envelope would not change and continue to be consistent with the underlying zone. Therefore, the revised project is consistent with all applicable land use plans and policies. As a result, no new mitigation is required.
11. Mineral Resources

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. Mineral resources have previously been analyzed and found to have no impact at the project site, and no features of the project that would impact mineral resources are changing. Therefore, the revised project will have no effect on mineral resources. As a result, no new mitigation is required.

12. Noise

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND with regard to construction and operational noise, nor will it significantly alter the scope and scale of the previously approved development project. The proposed project will not produce any additional impacts beyond what was previously analyzed in the adopted MND. Moreover, the proposed project’s construction and operational noise impacts would result in less than significant impacts with adherence to applicable sections of the Los Angeles Municipal Code and mitigation measures already adopted for the site. Therefore, expected noise impacts are expected to remain the same and the same impact conclusions and mitigation measures would continue to apply. As a result, no additional mitigation is required.

13. Population and Housing

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. The function and layout proposed for the LAPD warehouse has been contemplated and accounted for through the approval of the Site Plan Review and parcel map subdivision. Impacts on population and housing have previously been analyzed and found to be less than significant at the project site. There are no dwelling units located on, or persons residing within, the boundaries of project site. In addition, there are no homes that would be dislocated as part of the proposed project’s implementation. As such, the revised project will have no effect on population and housing. As a result, no new mitigation is required.

14. Public Services

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND and will not create any new significant impacts on Public Services. It will not generate a specific need for modified fire, police, school, or other public services beyond what was originally analyzed in the adopted MND. No new impacts would result from the project’s revisions. The proposed project involves the construction of a warehouse designed to store evidence and police vehicles/equipment. Forms of security include a state-of-the-art network of security cameras and other safety features on the exterior and interior of the structure will deter criminal activity. In addition, the facility will be occupied by the LAPD. The construction of additional space for the LAPD alleviates stress on police resources. Therefore, the revised project will have no new impacts on public services and no mitigation measures regarding public services (police and fire) apply since there are regulatory compliance measures that involve periodic field inspections during construction set in place by the Department of Building and Safety prior to the issuance of a building permit. As a result, no new mitigation is required.
15. Recreation

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. The proposed project will not result in a direct demand for park facilities. As a result, no changes in the demand for local parks and recreation facilities are anticipated and no impacts are anticipated. In addition, no recreational facilities are included with this project. Therefore, no impacts will result and the revised project will have no effects on recreation on the site. As a result, no new mitigation is required.

16. Transportation/Traffic

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND and is not expected to result in long-term, permanent negative impacts on the circulation system. The project’s construction may require up to 1,970 haul trucks (assuming a carrying capacity of 20 cubic yards). While the amount of import and export has not yet been determined, a worst case scenario was prepared and analyzed through the MND. Under a worst case scenario, the project will require the removal of up to 39,411 cubic yards of earth (assuming the entire site was excavated to a depth of nine feet bgs). A stock pile of clean fill is currently stored on-site. The use of this clean fill will reduce the number of truck trips that will be required to haul new import fill (assuming there was not a stock pile of fill on-site up to 1,970 additional haul trucks would have been required to import 39,411 cubic yards of clean fill). It is important to note that the amount of fill that will be removed is not yet known, therefore, the worst-case scenario was analyzed. The number of haul trucks may be significantly less if the quantity of soil is less than 39,411 cubic yards.

According to the Los Angeles Department of Transportation, a technical memorandum is required when the Development Project is likely to add 25 to 42 a.m. or p.m. peak hour vehicle trips, and the adjacent intersection(s) are presently estimated to be operating at LOS E or F. The proposed project will result in approximately seven morning and evening peak hour trips. In addition, the intersection of North Marianna Avenue and Worth Street is not operating at a LOS E or F. Since the project will not generate more than 25 peak hour trips, a technical memorandum was not prepared. Furthermore, the additional seven morning and evening peak hour trips will not degrade the level of service for the intersection of North Marianna Avenue and Worth Street. As a result, the potential impacts are considered to be less than significant. No other changes or impacts to Congestion Management Programs, safety hazards, bicycle and pedestrian facilities are expected to result. No new impacts would result and all mitigation measures related to proper maintenance of the public right-of-way landscaping and regulation of the circulation of construction vehicles will continue to apply. As a result, no additional mitigation is required.

17. Tribal Cultural Resources

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. The project completed the AB-52 consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project and mitigation measures were placed in case human remains or resources were found. However, the change to the proposed project is to increase the height limit by 16 feet, therefore the revised project will have no effect on tribal cultural resources. If any such resources are discovered during excavation, the project will continue to be required to adhere to any and all applicable California Public Resource Sections, California Health and Safety Code Sections, and all the mitigation measures related to tribal cultural resources continue to apply. As a result, no additional mitigation is required.
18. Utilities and Service Systems

The request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not substantially change the conclusion of the adopted MND. Impacts on utilities and service systems have previously been analyzed and found to be less than significant at the project site. The change to the project description would not have any resulting impacts on the availability or capacity of existing utilities and service systems. The approved use, like all other development in the City, would be required to adhere to all pertinent ordinances related to waste reduction and recycling regardless of the 16-foot increase in height proposed. As a result, no impacts on the existing regulations pertaining to solid waste generation would result from the proposed project’s implementation. No new impacts would result and all other impact conclusions will continue to apply. As a result, no new mitigation is required.

19. Mandatory Findings of Significance

The revised project will not produce any additional impacts beyond what was previously analyzed in the adopted MND, nor will it have an effect on related projects or cumulatively considerable impacts. The adopted mitigation measures and environmental conditions regarding cumulative impacts, including those regarding effects on human beings, have been addressed through the Mitigated Negative Declaration. Additionally, the project is subject to regulatory compliance measures prior to the issuance of a building permit or a Certificate of Occupancy. Therefore, no new impacts would result and all other impact conclusions will continue to apply. As a result, no new mitigation is required.

CONCLUSION

The Department of City Planning has determined that the additional request does not require additional mitigation measures, nor does it create any new potentially significant impacts or constitute significant new information.

As demonstrated by the included analysis, the additional request to allow an increase in height from 44 feet to 60 feet to an approved LAPD warehouse would not result in any additional significant impacts, would not substantially increase the severity of previously anticipated significant impacts, and would not otherwise require recirculation of the MND.

Inquiries regarding this matter shall be directed to Lilian Rubio at (213) 978-1840.

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Department of City Planning

NH:CS:LR

ENCLOSURE:
Limited Phase II Environmental Site Assessment – 1925 North Marianna Avenue
Mitigation Monitoring Program – LAPD Evidence Warehouse