



CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY

Council District: 14 Date: December 14, 2017
Lead City Agency: City of Los Angeles, LA Sanitation
Project Title: Hollenbeck Park Lake Rehabilitation and Stormwater Management Project

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 significant environmental impacts. The City of Los Angeles (City) Department of LA Sanitation – Watershed Protection Division (LA Sanitation) has determined that the proposed Hollenbeck Park Lake Rehabilitation and Stormwater Management Project (proposed project) is subject to CEQA and that no exemptions apply. Therefore, the preparation of an Initial Study is required.

An Initial Study is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise the lead agency may adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND).

The Initial Study contained herein 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). LA Sanitation is the lead agency under CEQA.

B. Document Format

This Initial Study is organized into seven 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.

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

Section IV, Environmental Effects/Initial Study Checklist: presents the City's Checklist for all impact areas and mandatory findings of significance.

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

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

Section VII, 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. If the Initial Study determines that a proposed project would have significant environmental impacts that would require further study and/or the implementation of mitigation measures, the lead agency may decide to prepare either an MND or EIR. If it is foreseen that no feasible mitigation measures may exist to reduce certain significant impacts identified in the Initial Study, the lead agency must prepare an EIR. 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 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 of the environmental issues presented in the Initial Study and to be evaluated in the EIR.

After the close of the 30-day review and comment period, the lead agency continues the preparation of the Draft EIR and associated technical studies (if any). Once the Draft EIR 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 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 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 are prepared. The lead agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, Draft EIR comments and list of commenters, and 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 considers the Final EIR, together with any comments received during the public review process, and makes a recommendation to the City Council on whether or not to certify the Final EIR and approve the project. One or more Council committees may then review the proposal and documents and make its own recommendation to the full City Council. The City Council is the decision-making body and also considers the Final EIR, together with any comments received during the review and comment process, in the final decision to certify the Final EIR 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.

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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 213/978-1073 or via the internet at <http://clerk.lacity.org/>.

If the project is approved, the City would file a Notice of Determination with the Los Angeles County Clerk within 5 days. The Notice of Determination would be posted by the Los Angeles County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. 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, would provide reasonable accommodation to ensure equal access to its programs, services, and activities.

II. PROJECT DESCRIPTION

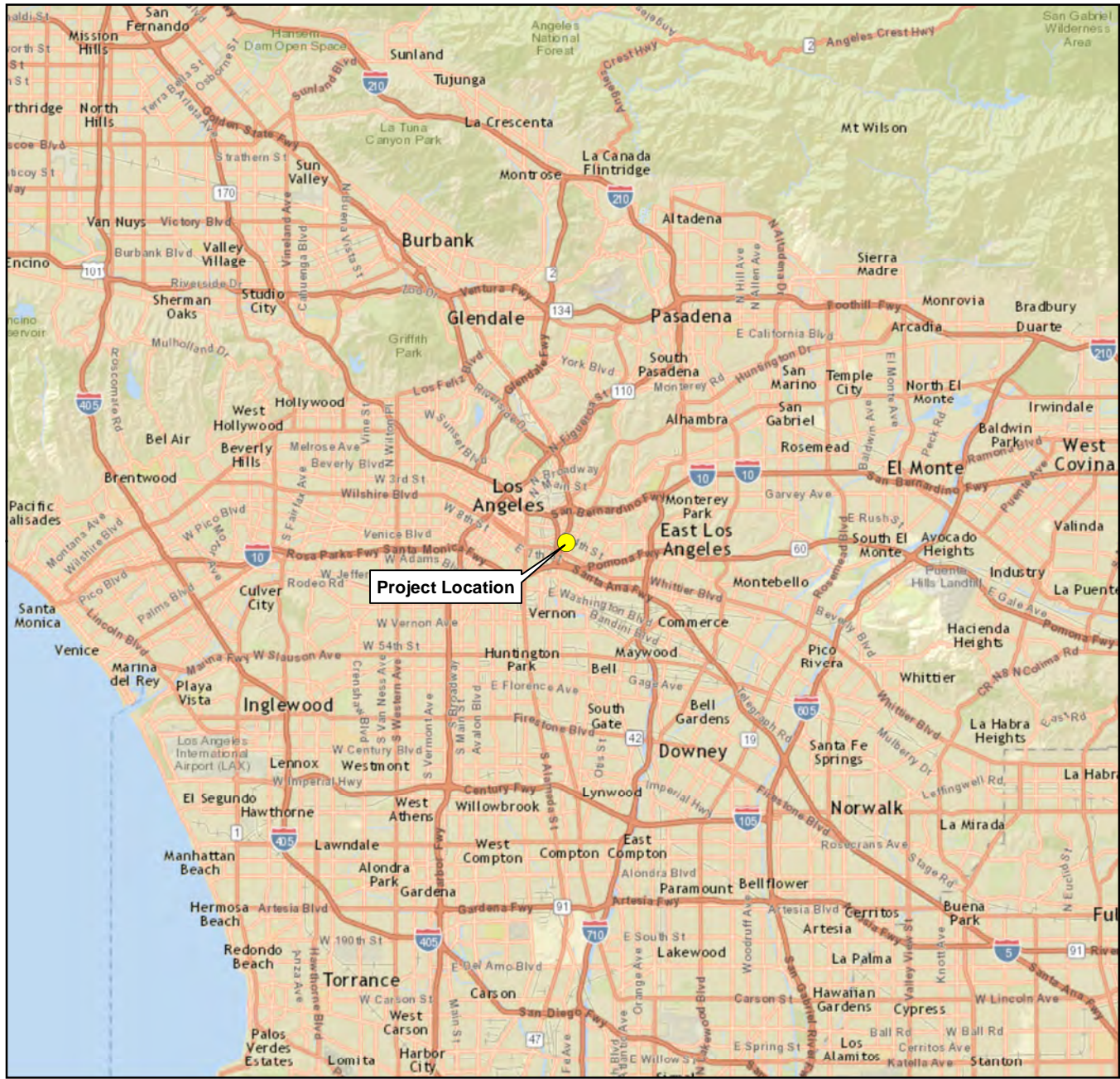
A. Location

The proposed Hollenbeck Park Lake Rehabilitation and Stormwater Management Project (proposed project) is located at 415 South Saint Louis Street in the Boyle Heights community, and Council District 14, of the City of Los Angeles. Hollenbeck Park is bound by East 4th Street on the north, South Saint Louis Street on the east, Hollenbeck Drive on the south, and Interstate (I) 5 on the west, with a small area on the southwest portion of the park, where the lake extends below I-5, that is bound by Boyle Avenue on the west. The proposed project is also located within the Los Angeles River Watershed. In addition to I-5, which is directly adjacent to the proposed project, U.S. Highway 101 travels in a north-south direction in this area of Los Angeles, and is located approximately 0.11 mile (580 feet) west of the proposed project. Hollenbeck Park is an urban park that provides aesthetic and recreational public uses for the community. The park is centered on Hollenbeck Park Lake (HPL), a 4.3-acre manmade urban water body that serves as an attractive water feature for public enjoyment. Hollenbeck Park is highly valued by the community as a recreational asset where green space is rare.

Figure 1 and Figure 2 (attached) show the regional location and the proposed project location, respectively.

B. Background

HPL has a history of water quality concerns attributable to nutrient and sediment loading, including California Department of Transportation (Caltrans) discharge of untreated runoff from I-5. Visually, one can readily discern that HPL water is turbid, with a limited transparency of 1 to 2 feet, indicating the presence of high populations of algal cells. Two decades have passed since the operation of the treatment systems installed at HPL, with the exception of the fountain recirculation system, and available information indicates that sediment has deepened and that internal cycling of nitrogen and phosphorus from the sediments to the water column continues within HPL. This situation has elevated the algal populations and contributed to a deterioration in lake water quality through eutrophication and a decrease in dissolved oxygen. There is also extensive erosion around the perimeter of HPL, most notable along the vegetated areas between the lake edge and existing pedestrian walkway. This erosion has begun to undermine the existing pavement, compromising visitor safety. The erosion is likely a result of the steep slopes around the lake, which produce erosive velocities for stormwater and irrigation runoff.



Basemap Source: ESRI World Street Map

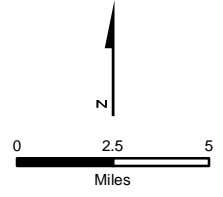
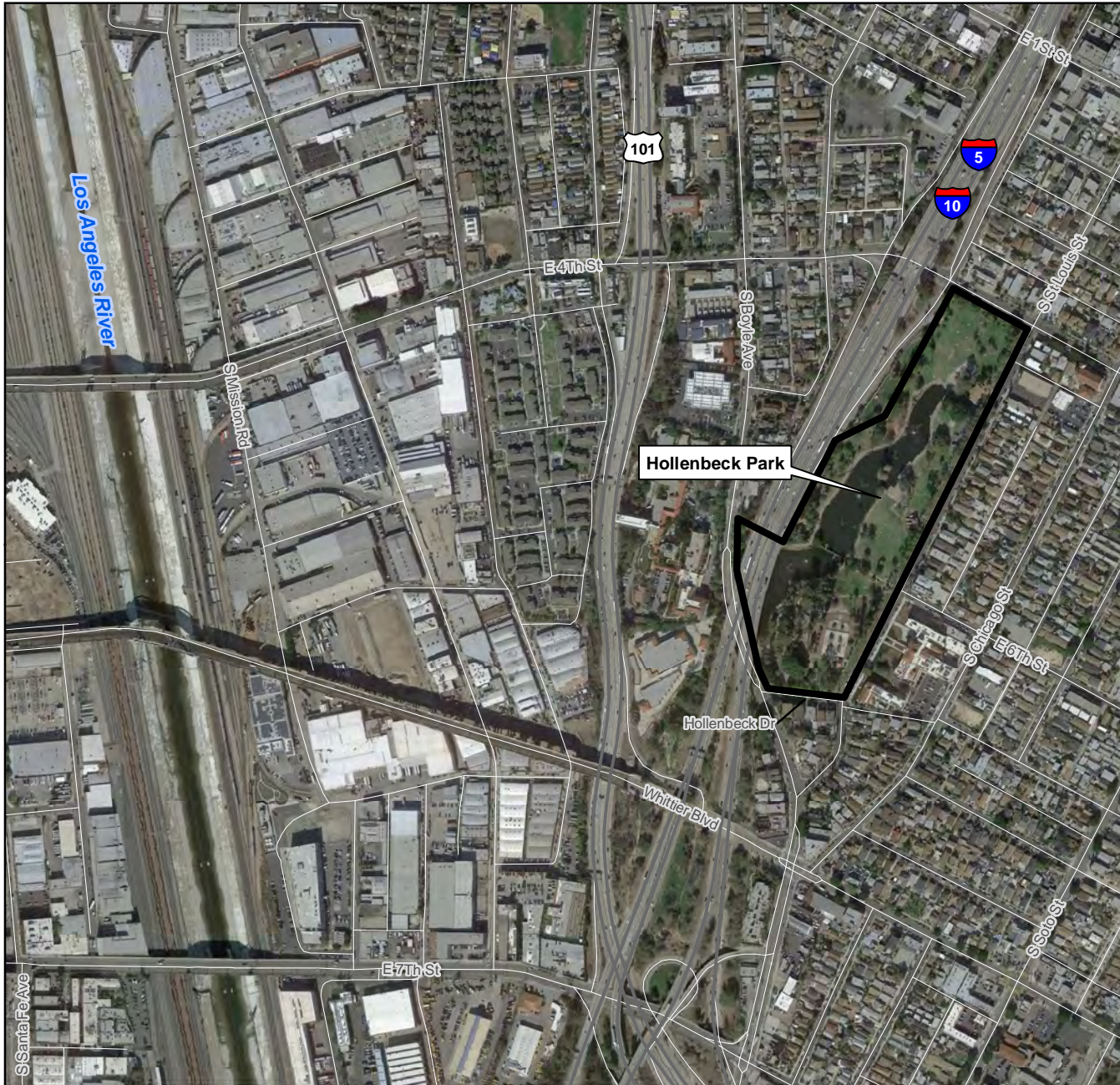


Figure 1.
Regional Map
Hollenbeck Park Lake Rehabilitation
and Stormwater Management Project





Basemap Source: Google Earth

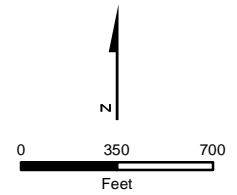


Figure 2.
Vicinity Map
*Hollenbeck Park Lake Rehabilitation
and Stormwater Management Project*



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C. Project Objectives

The main objectives of the proposed project are to:

- Improve water quality and control algae at HPL.
- Contribute to water quality improvement and Total Maximum Daily Load (TMDL) compliance in the Los Angeles River Watershed.
- Replace potable water use at HPL for irrigation and lake replenishment with dry/wet weather flow diversion and recycled water.
- Provide a long-term solution to erosion around the lake's edge.
- Restore Hollenbeck Park's appearance and function for aesthetic and recreational public uses for the community.

D. Project Description

Project Overview and Background

Hollenbeck Park, including HPL, has provided the City of Los Angeles and the community of Boyle Heights aesthetic and recreational public uses for over 100 years. As mentioned in Section II.B, above, HPL has a history of water quality concerns attributable to nutrient and sediment loading, including Caltrans discharge of untreated runoff from I-5. There is also extensive erosion around the perimeter of HPL, which is most notable along the vegetated areas between the lake edge and existing pedestrian walkway. This erosion has begun to undermine the existing pavement, compromising visitor safety. As a result, LA Sanitation is proposing to implement water quality improvements at HPL, divert and treat Caltrans runoff from I-5, replace the potable water deliveries at HPL for irrigation and lake replenishment with dry/wet weather flow diversion and recycled water, restore Hollenbeck Park's appearance, and provide a long-term solution to erosion around the lake's edge.

Project Elements

An overview of the proposed project is shown in Figure 3. The proposed project includes the following key components:

- **Replacement of Potable Water.** Recycled water is recommended to replace potable water use for irrigation and lake replenishment. The use of recycled water for irrigation already meets irrigation standards and would not require additional treatment. However, the use of recycled water for lake replenishment would require additional treatment, which can be integrated into park shoreline and public use features. The recycled water would be routed to tie into the irrigation system directly, as well as to the shoreline wetlands before being used for lake replenishment and potential future downstream uses.
- **Dry/Wet Weather Flow Diversion.** Dry weather flows and a portion of storm flows would be diverted and treated by the proposed shoreline wetlands at the lake. At the north side of the lake, a diversion structure with a wet weather well and pump would be constructed to connect to the existing storm drain. Diverted flows would be pretreated and pumped to the wetland system, or directly to the lake prior to the construction of the wetlands. Pretreatment by a hydrodynamic separator would screen, separate and remove trash, debris, sediment, and hydrocarbons from stormwater runoff.
- **Caltrans Diversion.** Additional treatment area from Caltrans right-of-way would be diverted and discharged to the lake. A total of 4.0 acres of runoff from the I-5 bridge would be piped to the lake and treated by the in-lake treatment system of floating wetland islands, aeration, chemical

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feed system, and recirculation. The existing Caltrans flow connects to a drainage system underneath the lake.

- **Processing.** A new submersible pump would be placed in the existing wet well that recirculates water from the lake. The recirculated water would be filtered and disinfected before distribution to the irrigation system. All processing equipment would be pre-assembled onto a high-density polyethylene processing skid located aboveground. The equipment skid is housed in a high-density polyethylene enclosure sized to contain the filtration and disinfection equipment, system controls, and irrigation controller. The processing skid would contain the treatment system and the control system.
- **Shoreline Wetlands.** Shoreline wetlands are included as a two-stage process to create an ecological habitat that would provide passive improvement of water quality through phosphorus uptake and assimilation, nitrogen transformation through denitrification, solids reduction through sedimentation and burial, algal control through shading and competition, and sequestration of metals as immobile and ecologically unavailable forms in wetland sediments. The new water supply (i.e., recycled water and dry/wet weather flow diversion) would be routed to the shoreline wetlands. In addition, stormwater and irrigation runoff from the park would be collected by a vegetated swale and routed to the shoreline wetlands. Water would be distributed through a gravel filter situated under a new pedestrian-friendly sidewalk, and discharged into a constructed shoreline wetland for final polishing before inflow to the lake.
- **Dewatering/Dredging.** Dredging of existing lake sediments would significantly improve water quality. Dredging can be performed using mechanical methods after the lake has been drained.
- **Lining.** A geosynthetic liner is recommended to eliminate seepage and significantly reduce the water demands at HPL. The geosynthetic liner has lower capital and installation costs compared with other materials.
- **Irrigation and Landscaping.** Water conservation methods can be applied to increase irrigation system water use efficiency. A key opportunity for HPL is the use of water-wise landscape vegetation consisting of native, drought tolerant trees, shrubs, and mulch and smart irrigation controllers (with weather and soil moisture sensors).
- **Sewer Replacement.** An existing sewer line that extends beneath the lake would be abandoned and a new 18-inch reinforced concrete pipe (RCP) sewer line would be installed along Saint Louis Street, Hollenbeck Drive, and Boyle Avenue, around the outside of the park.

Existing and Planned Improvements

Several existing and planned improvements at HPL are identified below and are shown in Figure 3. Discretionary actions are not required for these existing and planned improvements and they are not evaluated in Section IV. Environmental Effects/Initial Study Checklist. They are identified below for purposes of context and to differentiate them from the proposed project being evaluated in accordance with CEQA. However, it is anticipated these existing and planned improvements would occur prior to construction of the proposed project.

- **Floating Wetland Islands.** The floating wetland islands are expected to help control algae through competition for nutrients, enhanced settling of algal cells, and water column shading, and would assist with transformation and removal of nitrogen through denitrification. Five floating wetland islands were installed in 2015. It is anticipated that three additional floating wetland islands would be installed prior to construction of the proposed project.
- **Aeration.** Aeration is anticipated to improve water clarity through reduction in algal populations, and assist with nitrogen transformation from organic and ammonia forms by

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nitrification, and to enhance decomposition of organic sediments, thereby reducing internal loading from HPL sediments.

- **Chemical Feed System Retrofit.** Alum injection would reduce phosphorus concentrations, thereby reducing algal populations and enhancing solids settling.
- **Recirculation.** The existing recirculation system would integrate all of these nutrient removal and algal reduction processes by maintaining a short hydraulic residence time and assisting with the transport and distribution of alum throughout the lake, and through and around the root mat suspended from the floating wetland islands.

Preliminary Construction Schedule and Scenario

The estimated duration of the construction of the proposed project is September 2019 through October 2020. It is anticipated that the lake area, shoreline, and adjacent sloping areas would be closed to the public during construction. Construction activities are anticipated to occur during daylight hours.

The activities would include removal and storage of the existing floating wetland islands, aeration system, and the fountain/recirculation system followed by lake drawdown and sediment removal. The removed sediment would require drying, handling and hauling from the project site. The lake bed would be lined and shoreline wetland and walkway improvements would be constructed, along with stormdrain diversion. Subsequently, the aeration system and fountain/recirculation system would be reinstalled and the recycled water connection would be established. The lake would then be refilled and the floating wetlands would be reinstalled.

In addition to the lake improvements, an existing sewer line that extends below the lake would be abandoned and a new 18-inch RCP sewer line would be installed along Saint Louis Street, Hollenbeck Drive, and Boyle Avenue, around the outside of the park. It is anticipated that the majority of staging and storage for the lake bed improvements would occur within the southwestern area of the park boundary, adjacent to and underneath I-5. It is anticipated that the lake bed improvements would occur concurrently along with the improvements to the adjacent park. Improvements to the adjacent park include park grading and landscaping and pedestrian walkway rehabilitation. Temporary site offices during the construction phase may be located onsite.

Operation and Maintenance

The Department of Recreation and Parks operates and maintains Hollenbeck Park. However, it is currently anticipated that the proposed project would be jointly maintained by the Department of Recreation and Parks and LA Sanitation.

Project Actions and Approvals

The proposed project and environmental documentation, including this Initial Study, would require approval by the following City of Los Angeles decision-making bodies: the Board of Public Works and the City Council. Additional anticipated approvals or permits for the proposed project may include the following:

- U.S. Army Corps of Engineers (USACE) Section 404 Nationwide Permit
- Los Angeles Regional Water Quality Control Board (RWQCB) permits including Section 401 Water Quality Certification Permit and Waste Discharge Requirement
- California Department of Fish and Wildlife (CDFW) permits including CDFG Code Section 1600 Lake or Streambed Alteration Permit
- California State Water Resources Control Board (SWRCB) Water Quality Order 2012-001-DWQ (Discharge of storm water runoff from State right-of-way to waters of the United States)

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- California State Water Resources Control Board Water Quality Order 2012-0006-DWQ (General Construction Permit)
- California SWRCB Water Quality Order WQ 2016-0068-DDW (Application of recycled water for irrigation).
- California Department of Public Health (CDPH) Title 22 Engineering Report approval letter.
- Los Angeles County Department of Public Health (LACDPH) require review and approval of diverted storm drain water for irrigation.
- City of Los Angeles Department of Recreation and Parks, project and design review
- City of Los Angeles permits for disposal of materials and haul routes

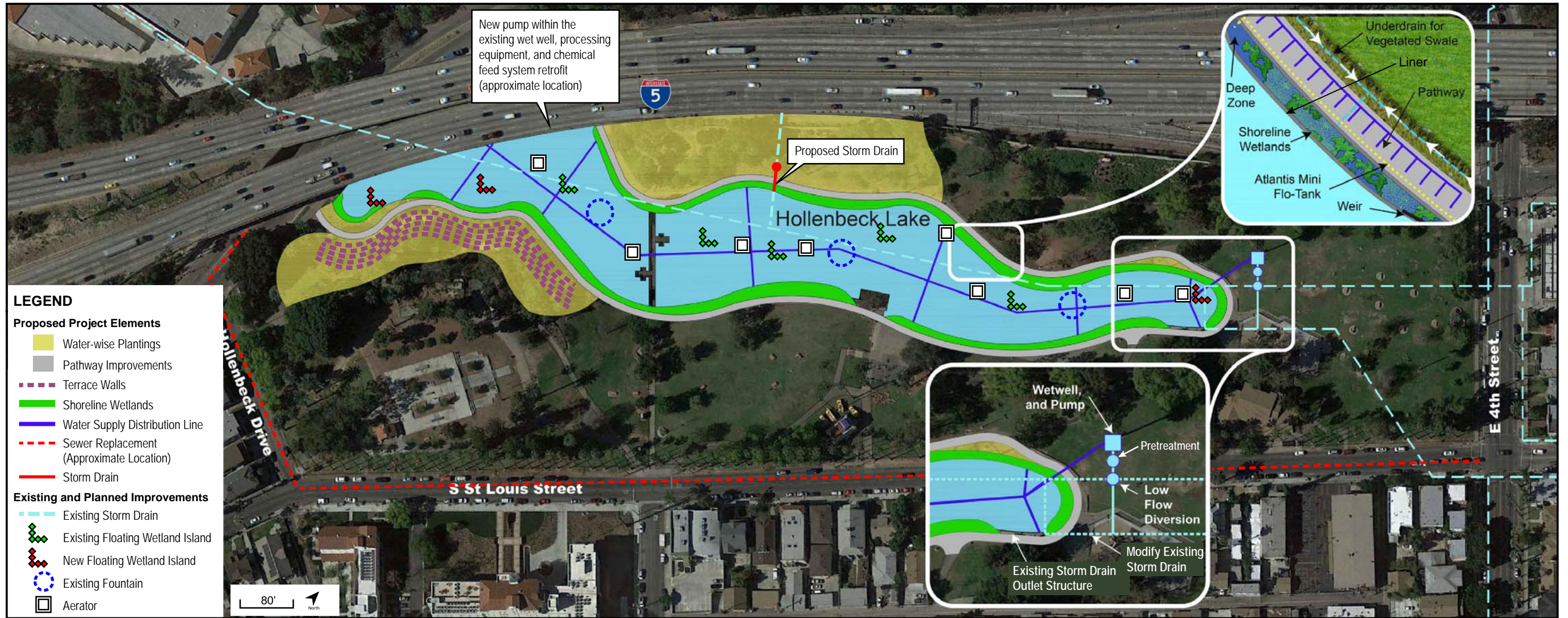


Figure 3
Proposed Project Site Plan
 Hollenbeck Park Lake Rehabilitation
 and Stormwater Management Project

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III. EXISTING ENVIRONMENT

Hollenbeck Park is a 21-acre open space community park that provides aesthetic and recreational public uses for the Boyle Heights community of Los Angeles. Hollenbeck Park is used by the community for walking, exercising, picnicking, and has an auditorium, barbecue pits, a basketball court, a playground, picnic tables, and a community room. The park is centered on HPL, a 4.3-acre manmade urban water body that serves as an attractive water feature for public enjoyment. HPL can be used for non-motorized boats and is regularly restocked for fishing. Hollenbeck Park contains numerous palm trees and other trees, shrubs, and open grassy areas. Hollenbeck Park is operated and maintained by the City of Los Angeles Department of Recreation and Parks.

The project site is located within the *Boyle Heights Community Plan* in the east area of the City of Los Angeles. The City of Los Angeles General Plan designates the project site as an open space land use. (City of Los Angeles, Zone Information and Map Access System [ZIMAS]).¹ The project site is primarily zoned Open Space (OS-1XL), which allows for parks and recreation facilities, natural resource preserves for the managed production of resources, marine and ecological preserves, sanitary landfill sites that have received certificates of closure in compliance with federal and state regulations, public water supply reservoirs, and water conservation areas. A small area on the southwest portion of the park, where the lake extends below I-5, is zoned Public Facilities (PF-1XL), which allows for farming and nurseries under transmission power rights-of-way, public parking facilities located under freeway rights-of way, fire stations and police buildings, government buildings, structures, offices, and service facilities, public libraries not located inside public parks, post offices and related facilities, public health facilities, public elementary and secondary schools, and certain other conditional uses (City of Los Angeles, ZIMAS; City of Los Angeles Municipal Code, Chapter I [Planning and Zoning Code]).^{2 3}

The project site is surrounded by public facilities (freeway) and multiple family residential (low medium II) uses. Hollenbeck Park is bound by East 4th Street on the north, South Saint Louis Street on the east, Hollenbeck Drive on the south, and I-5 on the west, with a small area on the southwest portion of the park, where the lake extends below I-5, that is bound by Boyle Avenue on the west. In addition to I-5, which is directly adjacent to the proposed project, U.S. Highway 101 travels in a north-south direction in this area of Los Angeles, and is located approximately 0.11 mile (580 feet) west of the proposed project. In general, one- to two-story multi-family residential buildings are located north, east, and south of the project site. A gas station is located on the corner of East 4th Street and South Cummings Street, to the north of the project site. St. Mary Catholic School is located near the intersection of East 4th Street and South Saint Louis Street, east of the project site. Linda Vista Seniors, a senior living apartment building, is located near the intersection of South Saint Louis Street and Inez Street, southeast of the project site.

The project site is located within the Los Angeles River Watershed. The Los Angeles River Watershed covers a land area of 834 square miles. The eastern portion spans from the Santa Monica Mountains to the Simi Hills and in the west from the Santa Susana Mountains to the San Gabriel Mountains. The watershed encompasses and is shaped by the path of the Los Angeles River, which flows from its headwaters in the mountains eastward to the northern corner of Griffith Park. Here the channel turns

¹ <http://zimas.lacity.org/>

² [http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120405sosopenspacezone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz_ca\\$anc=JD_12.04.05](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120405sosopenspacezone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.04.05)

³ [http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpublicfacilitieszone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz_ca\\$anc=JD_12.04.09](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpublicfacilitieszone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.04.09)

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southward through the Glendale Narrows before it flows across the coastal plain and into San Pedro Bay near Long Beach (City of Los Angeles, Department of Public Works, Watershed Management – Los Angeles River Watershed)⁴.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps 06037C1637F and 06037C1636F, both with effective dates of September 26, 2008, the project site is designated Zone X, Other Areas, which is determined to be outside the 0.2 percent annual chance floodplain (FEMA).⁵

⁴ <http://ladpw.org/wmd/watershed/LA/>

⁵ <https://msc.fema.gov/portal>

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IV. ENVIRONMENTAL EFFECTS/INITIAL STUDY CHECKLIST

This section documents the screening process used to identify and focus upon environmental impacts that could result from the proposed project. The Initial Study Checklist below follows closely the form prepared by the Governor’s Office of Planning and Research and was used in conjunction with the City’s *CEQA Thresholds Guide* and other sources to screen and focus upon potential environmental impacts resulting from the proposed project. In addition, the amendments proposed in April 2009 to the CEQA Guidelines, as they apply to the Initial Study Checklist, have been inserted into this document. Impacts are separated into the following categories:

- No Impact. This category applies when a project would not create an impact in the specific environmental issue area. A “No Impact” finding does not require an explanation when the finding is adequately supported by the cited information sources (e.g., exposure to a tsunami is clearly not a risk for projects not near the coast). A finding of “No Impact” is explained where the finding 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).
- Less Than Significant Impact. This category is identified when the project would result in impacts below the threshold of significance, and would therefore be less than significant impacts.
- Potentially Significant Unless Mitigation Incorporated. This category is identified when the project would have a substantial adverse impact on the environment but could be reduced to a less than significant level with incorporation of mitigation measure(s).
- Potentially Significant Impact. This category is applicable if there is substantial evidence that a significant adverse effect might occur, and no feasible mitigation measures are foreseen to reduce impacts to a less than significant level. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

Sources of information that adequately support these findings are referenced following each question.

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Issues	Potentially Significant Impact	Less Than Significant Unless Mitigation Incorporation	Less Than Significant Impact	No Impact
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I. AESTHETICS — Would the project:

- a) Have a substantial adverse effect on a scenic vista?

Reference: *L.A. CEQA Thresholds Guide* (Sections A.1 and A.2)

Comment: A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. A significant impact may occur if the proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially altered a view of a scenic vista.

Hollenbeck Park is located within a dense urban setting. It is located approximately 0.1 mile north of the commercial strip along Whittier Boulevard, and on its western edge, the park is framed and partially crossed by the I-5. From the higher elevation areas of the park along South Saint Louis Street, there are views toward the peaks of the San Gabriel Mountains to the north and to the downtown Los Angeles skyline to the west. HPL is in a lower elevation area of the park; views outward are blocked by the sloped walls of the bowl in which the lake is located. The I-5 also blocks views along the park’s western edge. As a result, there are no views toward the downtown Los Angeles skyline, and the views toward the San Gabriel Mountains are limited. Because the proposed project would consist of modifications to HPL and the area around it, and would not entail the addition of any structures, there would be no effect on existing views toward the San Gabriel Mountains. As a consequence, any impacts that the proposed project would have on views that might be considered scenic vistas would be less than significant, and no further analysis of this issue is required.

- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Reference: California Scenic Highway Mapping System, and *L.A. CEQA Thresholds Guide* (Sections A.1 and A.2)

Comment: The nearest designated state scenic highway to the project site is State Route 110/Arroyo Parkway, which is located approximately 2.7 miles northwest of the project site. No scenic state highways are located within the project site or vicinity. In addition, the proposed project would not damage or remove any scenic resources or scenic resources located on a state scenic highway. Therefore, the proposed project would result in no impact related to scenic resources. No further analysis of this issue is required.

- c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Reference: *L.A. CEQA Thresholds Guide* (Sections A.1 and A.2)

Comment: 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.

The proposed project includes a number of features that have the potential to alter the existing visual character and quality of the lake and the area immediately surrounding it. Overall, the installation of a strip of wetland vegetation around the lake’s edge to replace the eroded lake edges along the lake’s southern end and the newly installed and highly contrasting rip-rap along the edge of the lake in the area north of the pedestrian bridge is likely to be visually positive. However, it is possible that the introduction of this continuous strip of naturalistic vegetation along the lake’s edge may be perceived as

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Issues	Potentially Significant Impact	Less Than Significant Unless Mitigation Incorporation	Less Than Significant Impact	No Impact
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visually inconsistent with the lake’s formal design properties. The fencing that is likely to be required along the sidewalk and lakeside edges of the wetland strip to protect it from waterfowl could create visual contrasts. The implementation of the water-wise planting measures on the hillsides on the western and southwestern edges of the lake could alter the existing landscape in those areas, removing existing valued trees, shrubs, and ground covers and replacing them with species that are visually inconsistent with the park’s existing visual character. In a similar way, the terrace walls that are required to address the erosion taking place on the slope that borders the southeast side of the lake could have a negative effect on the hillside’s appearance.

Proposed project construction is now projected to be completed during an approximately 13-month period. During this time, HPL would be drained, large construction equipment would be present, and portions of the hillsides bordering the lake would be disturbed, creating some potentially large short-term visual changes. Measures would need to be implemented to visually screen views into the project site. In addition, measures would need to be put into place to minimize the creation of clouds of dust.

With appropriate design, all of the proposed project activities and features identified as having the potential to adversely impact the visual character and visual quality of the project site have the potential to be mitigated to keep the level of impact to a level is less than significant. To ensure that the proposed project would be designed and mitigated in a way to minimize its impacts to the visual character of the site or its surroundings, further analysis of this issue will be required.

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Reference: *L.A. CEQA Thresholds Guide* (Section A.4)

Comment: 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.

It is possible that with construction of the proposed bio swales, some of the existing light poles and fixtures located along the sidewalk along the HPL’s edge may need to be replaced. However, the light fixtures supported by the replacement poles would be likely to have similar lighting levels as the existing lighting and would not be likely to be a source of glare. In addition, the new lighting would be operated in compliance with applicable Municipal Code lighting requirements, and would not be located directly adjacent to any light-sensitive land uses.

The proposed project is currently planned so that all construction takes place in daylight hours. Should lighting be required for short-term nighttime construction that may be necessary or for staging and supply and equipment storage areas, its design would be governed by Municipal Code and Standard Specifications designed to minimize impacts (e.g., nighttime work areas would be shielded and light would be directed toward the areas where it was needed, and away from residences). Therefore, the proposed project would result in less than significant impacts related to light and glare. No further analysis of this issue is required.

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II. AGRICULTURE AND FORESTRY RESOURCES — In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. 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. 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?

Reference: California Department of Conservation – Division of Land Resource Protection; *City of Los Angeles General Plan Conservation Element*; *City of Los Angeles ZIMAS*

Comment: A significant impact may occur if the proposed project were to result in the conversion of state-designated agricultural land from agricultural use to a non-agricultural use.

No prime or unique farmland, or farmland of statewide importance, exists within the City of Los Angeles. The project site is not located on or near any property zoned or otherwise intended for agricultural uses. Therefore, the proposed project would result in no impacts related to the conversion of agricultural lands. No further analysis of this issue is required.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Reference: California Department of Conservation - Division of Land Resource Protection; *City of Los Angeles General Plan Conservation Element*; *City of Los Angeles ZIMAS*

Comment: 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 a non-agricultural use.

No land on or near the project site is zoned for or contains agricultural uses. No land on or near the project site is subject to a Williamson Act contract. The proposed project would result in no impacts related to the conversion of agricultural lands. No further analysis of this issue is required.

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Reference: California Department of Conservation - Division of Land Resource Protection; *City of Los Angeles General Plan Conservation Element*; *City of Los Angeles ZIMAS*

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Comment: A significant impact may occur if a project results in a conflict with existing zoning, or causes rezoning of forest land or timberland.

No land on or near the project site is zoned for or contains forest or timberland uses. Therefore, the proposed project would result in no impacts related to conflicts with forest land or timberland zoning. No further analysis of this issue is required.

- d) Result in the loss of forest land or conversion of forest land to non-forest use?

Reference: California Department of Conservation - Division of Land Resource Protection; *City of Los Angeles General Plan Conservation Element*; *City of Los Angeles ZIMAS*

Comment: A significant impact may occur if a project results in the conversion of forest land to another non-forest land use.

No land on or near the project site contains or is zoned for forest land uses. As such, the proposed project would not convert forest land to a non-forest land use. The proposed project would result in no impacts related to the conversion of forest land. No further analysis of this issue is required.

- e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Reference: California Department of Conservation - Division of Land Resource Protection; *City of Los Angeles General Plan Conservation Element*; *City of Los Angeles ZIMAS*

Comment: A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use or forest land to a non-forest land use.

See comments for II (a) and II (b) above. As described, no impacts to farm land or forest uses would occur. No further analysis of this issue is required.

III. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?

Reference: *L.A. CEQA Thresholds Guide* (Section B.1, B.2, and B.3); *City of Los Angeles General Plan Air Quality Element*; South Coast Air Quality Management District – CEQA Air Quality Analysis Guidance <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

Comment: The project site is located within the South Coast Air Basin, which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the air pollution control district responsible for the Air Quality Management Plan (AQMP), which is a comprehensive air pollution control program for attaining state and federal ambient air quality standards. As part of its General Plan, the City of Los Angeles adopted an Air Quality Element that contains policies and goals for attaining state and federal air quality standards, while simultaneously facilitating local economic growth and includes implementation strategies for local programs contained in the AQMP. A significant impact would occur if the proposed project were not consistent with the AQMP or the City’s General Plan.

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The Boyle Heights Community Plan addressed the east area of the City of Los Angeles. The City of Los Angeles' General Plan designates the project site as an open space land use.

The proposed project consists of constructed improvements to an existing recreational and park facility. Operation of the proposed project would remain similar to the ongoing maintenance activities after construction is complete. Existing uses on and surrounding the project site would not be changed. The construction phase of proposed project may potentially result in a violation of air quality thresholds or standards. Therefore, potential impacts due to construction of the proposed project will require further analysis.

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Reference: L.A. CEQA Thresholds Guide (Section B.1, B.2, and B.3); South Coast Air Quality Management District – CEQA Air Quality Analysis Guidance <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

Comment: 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 (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), coarse particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}) emissions resulting from construction and operation in the South Coast Air Basin.

The proposed project consists of improvements to an existing recreational and park facility. HPL would be dewatered and soil would be dredged from the project site and exported during the construction phase. A geosynthetic liner would be installed. Improvements also include replacement of potable water use for irrigation and lake replenishment with dry/wet weather flow diversion and recycled water. Installation of shoreline wetlands and irrigation and landscaping would also be included. Heavy equipment used during construction would include excavators, backhoes, loaders, bulldozers, cranes, graders, rollers, pavers, drill rigs, forklifts, dump trucks, flatbed trucks, water trucks, and dump trucks. Construction of the proposed project is anticipated to occur over a period of approximately 13 months.

Due to the number of heavy duty truck trips and off-road construction equipment anticipated to be required during construction of the proposed project, impacts related to the potential violation of an air quality threshold or standard due to construction emissions may be potentially significant. This issue will require further analysis.

After construction, the proposed project would not alter the operations of the park and would not result in an increase in traffic trips during the operational phase. No change in emissions is anticipated as a result of operation and maintenance.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

Reference: L.A. CEQA Thresholds Guide (Section B.1 and B.2); South Coast Air Quality Management District – CEQA Air Quality Analysis Guidance <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

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Comment: A significant impact would occur if the proposed project resulted 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 U.S. Environmental Protection Agency (EPA) and/or California Air Resources Board. The South Coast Air Basin is a non-attainment area for ozone and fine particulate matter (PM_{2.5}). In addition, the South Coast Air Basin is maintenance for coarse particulate matter (PM₁₀) and carbon monoxide (CO).

Construction emissions of the proposed project may potentially exceed the SCAQMD's thresholds of significance for criteria pollutants. Although the construction of the proposed project would be considered temporary in duration (approximately 13 months), the proposed project may result in potentially significant impacts related to a net increase of criteria pollutants. This cumulative analysis of emissions due to construction activities of the project will require further analysis.

- d) Expose sensitive receptors to substantial pollutant concentrations?

Reference: *L.A. CEQA Thresholds Guide* (Section B.1, B.2, and B.3)

Comment: A significant impact would occur if construction or operation of the proposed project generated pollutant concentrations to a degree that would significantly affect sensitive receptors.

The proposed project may potentially result in increased pollutant concentrations during construction. The project site is surrounded by sensitive receptors including multi-family residential uses, churches, senior living apartments, and schools. These receptors include children and elderly persons who may be particularly susceptible to the effects of a temporary increase in air quality pollutant concentrations.

An analysis would be prepared to determine the potential exposure during construction of the proposed project for criteria air pollutants and toxic air contaminants. Therefore, the proposed project may result in potentially significant impacts related to the exposure of sensitive receptors to substantial pollutant concentrations. This issue will require further analysis.

- e) Create objectionable odors affecting a substantial number of people?

Reference: *L.A. CEQA Thresholds Guide* (Section B.1 and B.2)

Comment: A significant impact would occur if the proposed project created objectionable odors during construction or operation that would affect a substantial number of people.

During construction, sources of odor may be diesel emissions from construction equipment and volatile organic compounds from coating applications or paving activities. However, these odors would be temporary and localized. Nonetheless, applicable best management practices (BMPs) such as those in SCAQMD Rule 431 (Diesel Equipment) would, in addition to minimizing air quality impacts, also help minimize potential construction odors. Construction of the proposed project would also involve removal of sediment and other materials from the lake bed, which may result in potentially significant impacts related to creating objectionable odors during the construction phase. This issue will require further analysis.

Proposed project improvements also include replacement of potable water use for irrigation and lake replenishment with dry/wet weather flow diversion and recycled water. In addition, installation of shoreline wetlands and irrigation and landscaping would be included. Odors are not anticipated to be created by the proposed project during operation.

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IV. 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 Wildlife or U.S. Fish and Wildlife Service?

Reference: *City of Los Angeles General Plan Conservation Element; L.A. CEQA Thresholds Guide* (Section C)

Comment: A significant impact may occur if the proposed project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited.

The project site consists of the 4.3-acre HPL, and the surrounding park lands. In addition to the man-made lake, the project site includes landscaped areas of grass, shrubs and trees. While such urban habitats generally do not provide high quality habitat for special-status species, there is potential that special-status species could utilize such habitats for breeding, foraging, or resting. Special-status species could be resident or transitory during migration. The proposed project would include construction activities on the shores of HPL, removal of existing vegetation, replacement of floating wetland islands, dredging existing sediments including draining the lake, lining the lake, and other activities that could affect special-status species if present.

To address impacts to special-status species, mitigation measures would be implemented to avoid and minimize impacts where feasible, including for example, providing wildlife relocation where needed, scheduling construction to avoid impacts to wildlife during sensitive life history periods, and excluding areas to protect special-status species if feasible.

These measures are anticipated to avoid or minimize impacts to various species of fish, turtles and amphibians in aquatic areas if present; to avoid impacts to bird species including great blue heron or other migratory and local resident birds, including ducks, coots, and songbirds; and to avoid impacts to various mammals, including bats. If these species or sensitive species are encountered during the construction phase, mitigation measure would be required to be implemented to ensure that the appropriate actions are taken in compliance with applicable local, state, or federal regulations and requirements. Therefore, the proposed project may result in potentially significant impacts related to sensitive species, but would be expected to be less than significant after mitigation. This issue will require further analysis.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Reference: *City of Los Angeles General Plan Conservation Element; L.A. CEQA Thresholds Guide* (Section C)

Comment: A significant impact may occur if riparian habitat or any other sensitive natural community were to be adversely modified.

USACE would determine jurisdiction within the project site due to the presence of the waters of the U.S., which may include a water body and wetlands. The California Department of Fish and Wildlife (CDFW)

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may also have jurisdiction over portions of the project site as stream bed and bank under Section 1600 of the California Fish and Game Code. Riparian areas, wetlands, other waters of the U.S., waters of the state are considered sensitive biological resources that fall under the jurisdiction of these regulatory agencies. Coordination, the approval of various permits, and implementation of mitigation measures would reduce any potential effects on these habitats. The proposed project may result in potentially significant but mitigatable impacts related to effects on sensitive habitats. This issue will require further analysis.

- 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?

Reference: *City of Los Angeles General Plan Conservation Element; L.A. CEQA Thresholds Guide* (Section C)

Comment: A significant impact may occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed.

Section 404 of the Clean Water Act (CWA) requires a permit from USACE for the discharge of dredged or fill material into navigable waters, or waters of the U.S. USACE regulations broadly define waters of the U.S. to include waters that may be used in interstate commerce, wetlands, and sloughs that could affect interstate commerce, tributaries to waters of the U.S., and territorial seas.

USACE has not historically had a consistent policy on whether artificial ponds and lakes were jurisdictional under the CWA. However, in May 2015 USACE and the EPA issued the Clean Water Rule: Definition of “Waters of the United States” Final Rule (Final Rule). The Final Rule would have excluded “small ornamental waters created in dry land” and “artificial, constructed lakes and ponds created in dry land.” However, on October 9, 2015, a divided panel on the U.S. Court of Appeals for the Sixth Circuit issued a nationwide stay against the enforcement of the Final Rule. Hence, rulemaking reverts to earlier rulemaking, which has not defined the jurisdictional status of artificial lakes.

While HPL is an artificial lake, created in dry ground, and hydrated primarily from potable sources, it does also receive storm drain flows from multiple inputs. Flow from HPL discharges to an existing outlet at the southern end of the lake, which subsequently connects to a Los Angeles County Flood Control District 96-inch RCP, and eventually discharges to the Los Angeles River, a Traditional Navigable Water (TNW). Because of this, it is likely USACE would consider storm flows in the lake to be tributary to a TNW, and take jurisdiction over the entire lake as a water of the U.S., requiring permitting. Where wetlands have established in sediments on the lake bottom or shorelines, potential jurisdictional wetlands would occur. The final jurisdiction of this water body including wetlands would be determined by the USACE.

The proposed project would include construction of various facilities directly within the lake, and potential removal of dredged material in the lake with installation of a liner. These actions would potentially impact jurisdictional waters including wetlands, a significant impact. Mitigation, if required, would be identified through the permitting process. With mitigation, the impact would be less than significant. This issue will require further analysis.

- 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?

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Reference: *L.A. CEQA Thresholds Guide* (Section C)

Comment: A significant impact may occur if the proposed project interfered or removed access to a migratory wildlife corridor or impeded the use of native wildlife nursery sites.

The project site includes the lake environment of HPL, and landscaped areas of grass, shrubs and trees. As such, the project site may potentially provide habitat for native resident or migratory fish or wildlife species. Limited tree removals are anticipated with the proposed project, which may potentially impact habitat suitable for wildlife movement or migration.

The CDFW maintains jurisdiction over native and state protected species. All birds and active bird nests are protected under the federal Migratory Bird Treaty Act of 1918 and the California Fish and Game Code (except for European starlings, English house sparrows, and rock doves). Coordination with CDFW would be implemented for fish and wildlife inhabiting the lake, as well as nesting birds surrounding the lake. Mitigation measures may be required to reduce potential adverse effects on any wildlife movement or migration, or native species nursery sites. Therefore, the proposed project may result in potentially significant impacts on wildlife movement or migration. This issue will require further analysis.

- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Reference: *L.A. CEQA Thresholds Guide* (Section C)

Comment: A significant impact may occur if the proposed project would cause an impact that was inconsistent with local regulations pertaining to biological resources.

The proposed project could potentially require the removal and replacement of trees currently located within the project site, particularly those trees located directly adjacent to the Lake edge. It is not anticipated that any protected trees, such as oak trees, would be removed as a result of the proposed project. However, mitigation measures may be required to ensure that the proposed project removes and replaces the trees in compliance with the City's tree protection ordinance and other applicable City policies. Therefore, the proposed project may result in potentially significant impacts related to tree preservation. This issue will require further analysis.

- 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?

Reference: *City of Los Angeles General Plan Conservation Element; L.A. CEQA Thresholds Guide* (Section C)

Comment: A significant impact may occur if the proposed project would be inconsistent with the adopted habitat conservation plans of the cited type.

The project site is not currently located in an adopted Habitat Conservation or Natural Community Conservation Plan area, or any other local, regional, or state habitat conservation plan area. Therefore, the proposed project would result in no impacts related to conflicts with habitat conservation plans. No further analysis of this issue is required.

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V. CULTURAL RESOURCES — Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Reference: *L.A. CEQA Thresholds Guide* (Section D.3); City of Los Angeles Cultural Heritage Commission "Historic-Cultural Monuments (HCM) Report by Planning Community;" *Boyle Heights Community Plan*

Comment: A significant impact may result if the proposed project caused a substantial adverse change to the significance of a historical resource.

A cultural resources records search would be prepared for the proposed project and analysis would be included in the EIR. The National Register of Historic Places (NRHP) online database and the California Register, California Historical Landmarks, and California Points of Historical Interest would also be examined. This issue will require further analysis.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Reference: *L.A. CEQA Thresholds Guide* (Section D.2); City of Los Angeles Cultural Heritage Commission "Historic-Cultural Monuments (HCM) Report by Planning Community;" *Boyle Heights Community Plan*

Comment: A significant impact may occur if the proposed project were to cause a substantial adverse change in the significance of an archaeological resource which falls under the CEQA Guidelines.

A cultural resources records search, including the NRHP online database and the California Register, California Historical Landmarks, and California Points of Historical Interest would be prepared for the proposed project and analysis would be included in the EIR. This issue will require further analysis.

- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Reference: *L.A. CEQA Thresholds Guide* (Section D.1 and E.3)

Comment: A significant impact may occur if grading or excavation activities associated with the proposed project would disturb unique paleontological resources or unique geologic features.

The cultural resources records search would be prepared for the proposed project and analysis of any identified paleontological resources within the project site would be included in the EIR. Should potentially important paleontological deposits be encountered during construction, in accordance with standard Department of Public Works construction practices, construction would be temporarily stopped from the vicinity of the find until a qualified resource specialist could evaluate the find and make recommendations, to protect the find or mitigate the potential impact. It is not anticipated that the proposed project would result in potentially significant impacts related to effects on paleontological resources. This issue will require further analysis.

- d) Disturb any human remains, including those interred outside of formal cemeteries?

Reference: *L.A. CEQA Thresholds Guide* (Section D.2)

Comment: A significant impact may occur if grading or excavation activities associated with the proposed project would disturb interred human remains.

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The cultural resources records search would be prepared for the proposed project and analysis would be included in the EIR. The NRHP online database and the California Register, California Historical Landmarks, and California Points of Historical Interest would also be examined.

The absence of specific site information in the Sacred Lands File does not preclude the possibility of cultural resources within the project area. Should human remains be encountered during construction, per standard Department of Public Works construction practice, work would be temporarily stopped from the vicinity of the find until the coroner is notified in accordance with the Health and Safety Code Section 7050.5. If the remains were determined to be of Native American descent, the coroner would have 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC would identify the person(s) thought to be the Most Likely Descendant, who would then help determine the appropriate course of action. It is not anticipated that the proposed project would result in potentially significant impacts related to the disturbance of interred human remains. This issue will require further analysis.

- e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources code §21074?

Reference: *Assembly Bill (AB) 52* (July 2015)

Comment: A significant impact may occur if the proposed project impacts tribal cultural resources (TCR).

As defined in Public Resources Code Section 21074, a TCR is a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is either on, or eligible for inclusion in, the California Register of Historical Resources or a local historic register, or is a resource that the lead agency, at its discretion and supported by substantial evidence, determines should be treated as a TCR.

The proposed project consists of improvements to an existing recreational and park facility. The lake would be dewatered and soil would be dredged from the project site and exported during the construction phase. A geosynthetic liner would be installed. Improvements also include replacement of potable water use for irrigation and lake replenishment with dry/wet weather flow diversion and recycled water, and installation of shoreline wetlands and irrigation and landscaping. Because the proposed project would occur at an existing recreational and park facility, and would be consistent with existing land uses, it would not have the potential to adversely affect TCRs. No further analysis of this issue is required.

VI. 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? Refer to Division of Mines and Geology Special Publication 42.

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Reference: California Department of Conservation Publication 42; *L.A. CEQA Thresholds Guide* (Section E.1); *City of Los Angeles General Plan Safety Element*

Comment: 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.

The project site is not located within a State of California Earthquake Fault Zone (formerly known as an Alquist-Priolo Special Study Zone). However, as is most of southern California, the project site is located in a seismically active area. Nonetheless, no active faults are known to cross the project site. The closest active fault is the Hollywood Fault, which is located approximately 4.7 miles northwest of the project site. The probable magnitude of an earthquake along the Hollywood Fault is 5.8 through 6.5. In addition, the Whittier Fault is located approximately 9.3 miles southwest of the project site. The probable magnitude of an earthquake along the Whittier Fault fault is 6.0 through 7.2.

Applicable building code requirements would be implemented. As part of building code (applicable California Building Code Seismic Design Criteria) and City of Los Angeles Bureau of Engineering (BOE) Standard Project Specifications, construction measures are prescribed that enable safe and efficient project implementation within areas subject to seismic movement. In accordance with standard practices, site-specific geotechnical and geological investigations that focus on these potential hazards are performed as part of project design studies and applicable recommendations incorporated. Therefore, the proposed project would result in less than significant impacts related to fault rupture. No further analysis of this issue is required.

ii) Strong seismic ground shaking?

Reference: *L.A. CEQA Thresholds Guide* (E.1)

Comment: 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.

Comment: See comment VI (a) (i) above.

iii) Seismic-related ground failure, including liquefaction?

Reference: California Department of Conservation Seismic Hazard Zones Map – Los Angeles Quadrangle; *L.A. CEQA Thresholds Guide* (Section E.1); *City of Los Angeles General Plan Safety Element*

Comment: 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 proposed project.

The project site is not located in an area mapped as potentially liquefiable. Additionally, site-specific geotechnical and geological investigations that focus on potential geologic hazards are performed as part of project design studies and applicable recommendations incorporated. Therefore, the proposed project would result in less than significant impacts related to liquefaction. No further analysis of this issue is required.

iv) Landslides?

Reference: California Department of Conservation Seismic Hazard Zones Map – Los Angeles Quadrangle; *City of Los Angeles General Plan* (Landslide Inventory and Hillside Areas in the City of Los Angeles Map); *L.A. CEQA Thresholds Guide* (Section E.1)

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Comment: A significant impact may occur if the proposed project would be located in an area identified as having a high risk of landslides.

The project site is not located within a designated hillside area or area of previous earthquake induced landslides. No known landslide areas are identified on the project site. Therefore, the proposed project would have no impact related to landslides. No further analysis of this issue is required.

- b) Result in substantial soil erosion or the loss of topsoil?

Reference: *L.A. CEQA Thresholds Guide* (Section E.2); *City of Los Angeles General Plan Safety Element*

Comment: 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.

The project site is not located in a high wind area. Construction of the proposed project would result in ground surface disruption activities, such as site excavation and sediment removal. These activities could result in the potential for erosion to occur at the project site. However, soil exposure would be temporary and short-term in nature and applicable Department of Building and Safety erosion control techniques would limit potential erosion. Therefore, the proposed project would result in less than significant impacts related to erosion or loss of topsoil. No further analysis of this issue is required.

- 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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Reference: *City of Los Angeles General Plan* (Landslide Inventory and Hillside Areas in the City of Los Angeles Map); *L.A. CEQA Thresholds Guide* (Section E.1)

Comment: A significant impact may occur if the proposed project were built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

As part of final design, a geotechnical evaluation would be conducted that 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, 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. No further analysis of this issue is required.

- 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?

Reference: Uniform Building Code

Comment: A geosynthetic liner would be installed on the lake bed. In addition, the proposed project would not construct any buildings. The improvements would not result in a substantial risk to life or property. Compliance with approved BMPs would prevent any effects related to expansive soils. Therefore, the proposed project would result in less than significant impacts related to expansive soils. No further analysis of this issue is required.

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

Reference: L.A. CEQA Thresholds Guide (Section E.3)

Comment: A significant impact may occur if the proposed project were built on soils that were incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system, and such a system were proposed.

No septic tanks or alternative wastewater disposal systems are proposed or needed with the proposed project. Therefore, the proposed project would result in no impacts related to inadequate soil support the use of septic tanks or alternative wastewater disposal systems. No further analysis of this issue is required.

VII. GREENHOUSE GAS EMISSIONS – Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Reference: Office of Planning and Research; South Coast Air Quality Management District – CEQA Air Quality Analysis Guidance <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

Comment: A significant impact may occur if the proposed project would generate a substantial amount of greenhouse gas (GHG) emissions.

The proposed project would include a large number of heavy-duty construction truck trips due to the required hauling of lake bed sediment during the construction. The proposed project would generate GHG emissions during construction. A detailed analysis is required to assess the proposed project’s contribution of GHG emissions during construction. The proposed project may result in potentially significant impacts related to GHG emissions. Further analysis of this issue is required.

Operations of the proposed project, which includes infrastructure and landscape improvements to enhance water quality at the existing HPL, would not result in the generation of additional GHG emissions. Therefore, a net increase in GHG emissions during the operational phase is not anticipated.

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

Reference: Office of Planning and Research; South Coast Air Quality Management District – CEQA Air Quality Analysis Guidance <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

Comment: A significant impact may occur if the proposed project would conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions.

The proposed project’s compliance with guidance set forth in the Office of Planning and Research, the California Air Pollution Control Officers Association, SCAQMD, and State Assembly Bill 32 would require further detailed analysis. Therefore, potentially significant impacts are anticipated related to conflicts with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions. Further analysis of this issue is required.

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VIII. 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?

Reference: *L.A. CEQA Thresholds Guide* (Section F.1 and F.2); *EnviroStor*, California Department of Toxic Substances Control; and *GeoTracker* State Water Resources Control Board

Comment: Operation of the proposed project would not routinely require transport, use, or disposal of significant quantities of hazardous materials, including, but not limited to oils, pesticides, or chemicals. Any chemicals or pesticides related to the upkeep of the grass, landscaping, or water quality at the project site would be stored in relatively small quantities in appropriate containers and handled per manufacturer’s instructions to protect the environment and the health and safety of park employees and the public.

Construction activities would be short-term and limited in nature, and may involve limited transport, storage, use or disposal of hazardous materials. No hazardous materials have been identified on the project site or would need to be exported from the project site. Examples of hazardous materials that may potentially be handled include contaminated groundwater or soil, fuels, lubricating fluids, and solvents. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated. Any excavation, treatment, and/or disposal of contaminated groundwater or soil would be conducted to the satisfaction of the applicable regulatory agencies, which could include the California Department of Toxic Substances Control and RWQCB. Further analysis of this issue is required.

- 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?

Reference: *L.A. CEQA Thresholds Guide* (Section F.1 and F.2); *EnviroStor*, California Department of Toxic Substances Control; and *GeoTracker*, State Water Resources Control Board

Comment: See comment VIII (a) above.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Reference: *L.A. CEQA Thresholds Guide* (Section F.2); *EnviroStor*, California Department of Toxic Substances Control

Comment: A significant impact may occur if the proposed project were located within one-quarter mile of an existing or proposed school site and were projected to release toxic emissions which pose a hazard beyond regulatory thresholds.

Breed Street Elementary School, Hollenbeck Middle School, Second Street Elementary School, Dolores Mission School, St. Mary School, and the International Institute of Los Angeles are located within one-quarter mile of HPL. As discussed in VIII (a) above, a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials is not anticipated as a result of the proposed project. Therefore, the proposed project would result in less than significant impacts related to

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the emission of hazardous emissions or the handling of hazardous materials within one-quarter mile of an existing or proposed school. Further analysis of this issue is required.

- 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: *L.A. CEQA Thresholds Guide* (Section F.2); *EnviroStor*, California Department of Toxic Substances Control; and *GeoTracker*, State Water Resources Control Board

Comment: The project site is not listed in the State Water Resources Control Board GeoTracker system, which includes leaking underground fuel tank sites and the spills, leaks, and investigations category. The project site is not listed on the California Department of Toxic Substances Control's EnviroStor Data Management System, which includes Cortese List sites. The project site is not listed on the EPA's database of regulated facilities. Therefore, the proposed project would result in no impacts related to the project site being included on a list of hazardous material sites. No further analysis of the issue is required.

- 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?

Reference: *L.A. CEQA Thresholds Guide* (Section F.1 and K.2), *Boyle Heights Community Plan*

Comment: A significant impact may occur if the project site was located within a public airport land use plan area, or within 2 miles of a public airport, and would create a safety hazard.

The project site is not located within an airport land use plan area, nor is the project site located within 2 miles of a public airport or public use airport. Additionally, the proposed project would not construct tall buildings or structures that would interfere with local airport operations, resulting in a safety hazard. Therefore, the proposed project would result in no impacts related to airport safety hazards. No further analysis of this issue is required.

- 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?

Reference: *L.A. CEQA Thresholds Guide* (Section F.1 and K.2), *Boyle Heights Community Plan*

Comment: The project site is not located within the vicinity of a private airstrip. Therefore, the proposed project would result in no impacts related to private airstrip hazards. No further analysis of this issue is required.

- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Reference: *L.A. CEQA Thresholds Guide* (Section F.1 and K.2); *City of Los Angeles General Plan Safety Element*

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Comment: A significant impact may occur if the proposed project were to substantially interfere with roadway operations used in conjunction with an emergency response plan or evacuation plan or would generate sufficient traffic to create congestion that would interfere with the execution of such a plan.

The proposed project would not alter the use of Hollenbeck Park and HPL, as well as the adjacent street system. As applicable, any traffic detour plans during construction would address emergency response or emergency evacuation for implementation during construction. Therefore, the proposed project would result in less than significant impacts related to emergency response and emergency evacuation plans. No further analysis of this issue is required.

- 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?

Reference: *L.A. CEQA Thresholds Guide* (Section K.2); *City of Los Angeles General Plan Safety Element*

Comment: A significant impact may occur if the proposed project were located in a wildland area and poses a significant fire hazard, which could affect persons or structures in the area in the event of a fire.

The project site is not located in or adjacent to a wildland area, wildland fire area or urban fire area as designated by the *City of Los Angeles General Plan Safety Element*. Therefore, the proposed project would result in no impacts related to wildland fires. No further analysis of this issue is required.

IX. HYDROLOGY AND WATER QUALITY —Would the project:

- a) Violate any water quality standards or waste discharge requirements?

Reference: *L.A. CEQA Thresholds Guide* (Section G.2)

Comment: A significant water quality impact may occur if the proposed project discharged water, which violated a regulatory standard for surface water quality, including for discharge into stormwater drainage systems.

During construction, short-term impacts to water quality would be regulated under California State Water Resources Control Board Water Quality Order 2012-0006-DWQ (General Construction Permit). Under this permit, the City of Los Angeles would implement a storm water pollution prevention plan and construction BMPs to minimize significant impacts to water quality during construction. Nonetheless, additional mitigation measures may be needed during construction to maintain compliance with water quality standards. The proposed project may result in potentially significant impacts related to violation of water quality standards during construction. Further analysis of this issue is required.

The proposed project includes the operational objectives of replacing potable water use for irrigation and lake replenishment at HPL with dry/wet weather flow diversion and recycled water. Diversion of dry/wet weather flow may be regulated under the City of Los Angeles MS4 Permit (Amended Order WQ 2015-0075) with the Regional Water Quality Control Board (Region 4). Similarly, diversion and treatment of Caltrans runoff from I-5 would be regulated under California State Water Resources Control Board Water Quality Order 2012-0011-DWQ. Under this permit, Caltrans is required to treat storm water runoff. In addition, Los Angeles County Department of Public Health may require review and approval of diverted storm drain water for irrigation. Diverted storm drain water for irrigation use would have to achieve California Maximum Contamination Levels and California Toxics Rule Standards and spray

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irrigation must also achieve coliform and bacteria limits and comply with a variety of operational conditions (e.g., setbacks from drinking fountains and adjacent properties, scheduling, signage). Review and approval of diverted storm drain water for irrigation may be needed from California Department of Public Health (CDPH) and Los Angeles County Department of Public Health. Application of recycled water for irrigation would be regulated under California State Water Resources Control Board Water Quality Order WQ 2016-0068-DDW. Under this permit, the City of Los Angeles would need to acquire a Title 22 Engineering Report approval letter from CDPH. The proposed project may result in potentially significant impacts related to violation of water quality standards during operation. Further analysis of this issue is required.

- 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)?
-

Reference: *L.A. CEQA Thresholds Guide* (Section G.2 and G.3)

Comment: A significant impact on groundwater supplies would occur if the proposed project resulted in a reduction of groundwater recharge capacity or lowering of the water table such 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 yields of adjacent wells or well fields, or adversely change the rate or direction of groundwater flow.

The proposed project includes the operational objectives of replacing potable water use at HPL for irrigation and lake replenishment with dry/wet weather flow diversion and recycled water. The proposed project also includes the operational objective of improving water quality at HPL. Implementation of the proposed project improvements to meet these objectives would not result in significant changes to the groundwater supply. Therefore, the proposed project would result in less than significant impacts related to groundwater supplies. No further analysis of this issue is required.

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or offsite?
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Reference: *L.A. CEQA Thresholds Guide* (Section G.1 and G.2)

Comment: 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.

The proposed project includes the operational objective of providing a long-term solution to erosion around the lake’s edge. This would be achieved through park landscape enhancements, which would also improve HPL’s water quality. The proposed project also includes diversion of dry/wet weather flow diversion and treatment of Caltrans runoff from I-5 to the lake, in addition to recycled water, to replace potable water use. However, surface drainage patterns would not be significantly altered resulting in erosion or siltation. The proposed project would result in less than significant impacts related to drainage patterns. No further analysis of this issue is required.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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, which would result in flooding on- or offsite? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Reference: *L.A. CEQA Thresholds Guide* (Section G.1)

Comment: 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.

The proposed project would divert dry/wet weather flow and divert and treat Caltrans runoff from I-5 to the lake, in addition to recycled water, to replace potable water use. This would result in a minor alteration of drainage patterns in the vicinity. However, it is not anticipated that the proposed project would result in a substantial increase in flooding as compared to existing conditions. In addition, two Los Angeles County Flood Control District overflow structures are located at the north and south ends of HPL, which would be utilized to prevent flooding at the lake. The proposed project would result in less than significant impacts related to flooding. No further analysis of this issue is required.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Reference: *L.A. CEQA Thresholds Guide* (Section G.1)

Comment: A significant impact may occur if the volume of runoff were to increase to a level which exceeded the capacity of the storm drain system serving a project site. A significant impact may also occur if the proposed project would substantially increase the probability that polluted runoff would reach the storm drain system.

See comment for IX. a, above. During construction, earthwork activities such as excavation would result in the disturbance of soil. During storm events, stormwater runoff could carry sediments and other substances from construction activities, which could result in stormwater pollution discharges to the storm drain system. Further analysis of this issue is required.

Operation of the proposed project would involve the diversion of dry/wet weather flow and diversion and treatment of Caltrans runoff from I-5 to the lake, in addition to recycled water, to replace potable water use. Such diversion is not anticipated to contribute runoff that would exceed the capacity of the storm drain system or provide additional sources of polluted runoff. No further analysis of this issue is required.

- f) Otherwise substantially degrade water quality?

Reference: *L.A. CEQA Thresholds Guide* (Section G.3)

Comment: A significant impact may occur if a project included potential sources of water pollutants and potential to substantially degrade water quality.

See comment for IX. a and IX.e, above, which address impacts to water quality. Further analysis of this issue is required.

- 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?

Reference: FEMA, Flood Insurance Rate Maps 06037C1637F and 06037C1636F; *L.A. CEQA Thresholds Guide* (Section G.1 to G.4)

Comment: The proposed project does not include housing. No further analysis of this issue is required.

- h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?

Reference: FEMA, Flood Insurance Rate Maps 06037C1637F and 06037C1636F; *L.A. CEQA Thresholds Guide* (Section G.4)

Comment: According to FEMA Flood Insurance Rate Maps 06037C1637F and 06037C1636F, both with effective dates of September 26, 2008, the project site is designated Zone X, Other Areas, which is determined to be outside the 0.2 percent annual chance floodplain (FEMA, <https://msc.fema.gov/portal>). Thus, the proposed project is not within a 100-year flood hazard area. No further analysis of this issue is required.

- 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?

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Reference: *City of Los Angeles General Plan Safety Element; L.A. CEQA Thresholds Guide* (Section G.1 and G.3)

Comment: 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.

The project site is not at risk from inundation (flooding due to the failure of a dam or levee.). Therefore, the proposed project would not 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. No further analysis of this issue is required.

- j) Inundation by seiche, tsunami, or mudflow?

Reference: *City of Los Angeles General Plan Safety Element; L.A. CEQA Thresholds Guide* (Section E.1 and G.3)

Comment: A significant impact may occur if the proposed project would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. The Inundation and Tsunami Hazard Areas map (Exhibit G) of the *Safety Element of the Los Angeles City General Plan* (adopted by City Council November 26, 1996) indicates the project site is not located within a potential inundation and tsunami hazard area. The project site is located approximately 15 miles east of the Pacific Ocean. In addition, the project site is not identified as being within a mudflow risk area. The project site is not located in close proximity to a body of water that, during a seismic or other event, has the potential to result in a seiche or a standing wave. Therefore, the proposed project would result in no impacts related to inundation by seiche, tsunami or mudflow. No further analysis of this issue is required.

X. LAND USE AND PLANNING — Would the project:

- a) Physically divide an established community?

Reference: *City of Los Angeles General Plan, L.A. CEQA Thresholds Guide* (Section H.2)

Comment: Determination of impact is made based on several factors, including whether the proposed project is sufficiently large or otherwise configured in such a way as to create a physical barrier within an established community.

The proposed project involves below ground or surface level improvements within an existing City park. The project site is surrounded primarily by multi-family residential land uses. However, no large structures or buildings would be constructed with the proposed project that would potentially physically divide this community. The land use of the project site would remain open space with the implementation of the proposed project. Therefore, the proposed project would result in no impacts related to the division of an established community. No further analysis of this issue is required.

- 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?

Reference: *City of Los Angeles General Plan, L.A. CEQA Thresholds Guide* (Section H.1 and H.2), and *City of Los Angeles ZIMAS*

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Comment: 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.

The existing General Plan land use designation and the zoning designation for the project site is open space. The proposed project would not alter the land use of the project site. The proposed project would not conflict with any applicable land use plans. Therefore, the proposed project would result in no impacts related to land use plans. No further analysis of this issue is required.

- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Reference: *City of Los Angeles General Plan, L.A. CEQA Thresholds Guide* (Section H.1 and H.2)

Comment: 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.

No habitat conservation plan or natural community conservation plan exists for the project site. Therefore, the proposed project would result in no impacts related to conflicts with habitat conservation or natural community conservation plans. No further analysis of this issue is required.

XI. 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?

Reference: *City of Los Angeles General Plan Conservation Element (Mineral Resources Map); L.A. CEQA Thresholds Guide* (Section E.4)

Comment: No mineral resources are identified within the project site. Therefore, the proposed project would result in no impacts related to mineral resources. No further analysis of the issue is required.

- 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?

Reference: *City of Los Angeles General Plan; L.A. CEQA Thresholds Guide* (Section E.4)

Comment: See comment XI (a) above.

XII. 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?

Reference: *City of Los Angeles General Plan Noise Element; L.A. CEQA Thresholds Guide* (Section I.1, I.2, I.3, and I.4)

Comment: A significant impact may occur if the proposed project resulted in or exposed people to noise levels that exceeded the standards established by the general plan and and/or noise ordinance of the Municipal Code.

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California State Government Code Section 65302 mandates that noise elements be included in city general plans and that cities adopt comprehensive noise ordinances to manage noise. The *Los Angeles City General Plan Noise Element* (Noise Element) and the City of Los Angeles Municipal Code's *Noise Ordinance* (Noise Ordinance) include local noise provisions applicable to the proposed project. The *L.A. CEQA Thresholds Guide* (City of Los Angeles, 2006) identifies guidelines for evaluating construction and operational noise levels in accordance with the provisions of the City's Noise Element and Noise Ordinance.

The Noise Element applies to the City of Los Angeles as a whole and provides goals, policies, and implementation programs to minimize exposure to excessive noise sources and to identify new significant potential noise sources (City of Los Angeles, 1999). The Noise Element summarizes the major existing noise sources and associated noise contours in the city, which include automotive vehicles, rail systems, and aircraft and airport facilities (City of Los Angeles, 1999). Generally, the goals and policies of the Noise Element reflect broad policy aims to establish compatible adjacent land uses that minimize new noise conflicts and protect sensitive land uses with appropriate noise emission and standards. Therefore, the Noise Element guides noise management within the City of Los Angeles. The Noise Element is implemented through Section 111.00 (Noise Regulation) of the *City of Los Angeles Municipal Code* (LAMC).

The Noise Regulation ordinances contained in Section 111.00 of the LAMC provide minimum ambient noise levels (LAMC 111.03) relative to City land use zone designations and specify requirements for special noise sources such as construction noise (LAMC 112.03). Minimum ambient noise level standards for land use zone designations are provided in LAMC 111.03. As described in LAMC 112.03, noise resulting from construction is regulated by LAMC 41.40. Section 41.40 of the LAMC addresses when noise due to construction and excavation work is prohibited. Specifically, LAMC 41.40.a states the following:

No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power driven drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified (City of Los Angeles, 2013).

Construction is expected to take approximately 13 months to complete and construction activities would typically occur from Monday to Friday during normal daytime work hours (for example, between 7:00 a.m. and 7:00 p.m.). HPL would be dewatered and soil would be dredged from the project site and exported during the construction phase. A geosynthetic liner would be installed. Improvements also include replacement of potable water use for irrigation and lake replenishment with dry/wet weather flow diversion and recycled water. Installation of shoreline wetlands and irrigation and landscaping would also be included. Construction equipment to be used is considered loud and would temporarily increase noise levels in the project area. However, construction would occur Monday to Friday during normal daytime work hours (for example, between 7:00 a.m. and 7:00 p.m.).

The project site is surrounded by public facilities (freeway) and multiple family residential (low medium II) uses. In addition to I-5, which is directly adjacent to the proposed project, U.S. Highway 101 travels in a north-south direction in this area of Los Angeles. Construction of the proposed project would result in a temporary increase in noise levels in the project area. The temporary increase in noise would result from

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the heavy duty haul truck traffic and various construction equipment used to drain the lake and remove sediment.

The proposed project would not create any long-term noise impacts (including excessive ground-borne vibration) in excess of City standards and would not result in a substantial permanent increase in ambient noise levels above existing levels. Construction activities would temporarily increase noise levels above existing levels.

Further technical analysis is required to assess the level of noise impact during the construction phase, the degree to which the proposed activities would comply with applicable noise standards, and to proposed mitigation measures that would reduce the effects. Therefore, the proposed project may result in potentially significant impacts related to generation of noise levels. Further analysis of this issue is required.

Operation of Hollenbeck Park after implementation of the proposed improvements would not be altered from existing conditions. Therefore, operational noise is not anticipated to increase with the proposed project.

- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Reference: *L.A. CEQA Thresholds Guide* (Section I.1, I.2, I.3, and I.4)

Comment: A significant impact may occur if the proposed project were to expose persons to or generate excessive groundborne vibration or groundborne noise levels.

Construction activities associated with the proposed project could generate groundborne vibration from use of heavy equipment. However, and typically, activities such as pile driving would generate excessive vibration. Pile driving would not occur as part of project construction. Therefore, it is anticipated the proposed project would result in less than significant impacts related to groundborne vibration. However, further analysis of this issue is required.

- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Reference: *L.A. CEQA Thresholds Guide* (Section I.2, I.3, and I.4)

Comment: A significant impact may occur if the proposed project were to substantially and permanently increase the ambient noise levels in the project vicinity above levels existing without the proposed project.

Further technical analysis is required to assess the level of project noise impacts during construction, the degree to which the proposed activities would comply with applicable noise standards, and to proposed mitigation measures that would reduce the effects. Therefore, the proposed project may result in less than significant with mitigation incorporated impacts related to generation of noise levels. Further analysis of this issue is required.

- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Reference: *L.A. CEQA Thresholds Guide* (Section I.1, I.2, I.3, and I.4)

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Comment: A significant impact may occur if the proposed project were to create a substantial temporary or periodic increase in the ambient noise levels that conflicts with the noise conditions allowed in the City's Noise Ordinance.

For projects where construction activities occur further than 500 feet from a noise sensitive use and construction would not occur between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday, there would normally be no significant impact from construction. A project would normally have a significant impact on noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 A-weighted decibels (dBA) or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.

Construction activities are the only temporary or periodic activities associated with the proposed project that emit noise. The *L.A. CEQA Thresholds Guide* has screening criteria that state projects do not normally have significant impacts where construction activities occur further than 500 feet from a noise sensitive use and do not occur between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday. The nearest sensitive receptor to the site is approximately 500 feet northwest from anticipated construction activity.

While construction of the proposed project would occur between the hours of 7:00 a.m. and 9:00 p.m., the proposed project would utilize heavy equipment during construction, and would include excavators, backhoes, loaders, bulldozers, cranes, graders, rollers, pavers, drill rigs, forklifts, dump trucks, flatbed trucks, water trucks, and dump trucks. Construction of the proposed project is anticipated to occur over a period of approximately 13 months.

The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on noise levels from construction if construction activities lasting more than 10 days in a 3 month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use. Further analysis of this issue is required.

- 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?

Reference: *L.A. CEQA Thresholds Guide* (Section I.1, I.2, and I.4)

Comment: The project site is not located within an airport land use plan area or within 2 miles of a public airport or public use airport. Therefore, the proposed project would result in no impacts related to excessive noise levels near an airport. No further analysis of this issue is required.

- 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?

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Issues	Potentially Significant Impact	Less Than Significant Unless Mitigation Incorporation	Less Than Significant Impact	No Impact
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Reference: *L.A. CEQA Thresholds Guide* (Section I.1, I.2, and I.4)

Comment: The project site is not located within the vicinity of a private airstrip. Therefore, the proposed project would result in no impacts related to excessive noise levels near a private airstrip. No further analysis of this issue is required.

XIII. 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)?

Reference: *L.A. CEQA Thresholds Guide* (Section J.1); *Boyle Heights Community Plan*

Comment: A significant impact may occur if the proposed project induced substantial population and housing growth through new development in undeveloped areas or by introducing unplanned infrastructure that was not previously evaluated in the adopted community plan or general plan.

The proposed project would not promote population growth either directly or indirectly, since it consists of infrastructure and landscape improvements to enhance water quality at the existing HPL. Therefore, the proposed project would result in no impacts related to inducing population growth in the project area. No further analysis of the issue is required.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Reference: *L.A. CEQA Thresholds Guide* (Section J.1 and J.2)

Comment: The project site currently consists of open space and recreational facilities. No housing is located on the project site. The proposed project would not displace any existing housing units. Therefore, the proposed project would result in no impacts related to housing displacement and replacement. No further analysis of this issue is required.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Reference: *L.A. CEQA Thresholds Guide* (Section J.2)

Comment: See comment XIII (a) above.

XIV. PUBLIC SERVICES

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:

- a) Fire protection?

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<h1>Issues</h1>	Potentially Significant Impact	Less Than Significant Unless Mitigation Incorporation	Less Than Significant Impact	No Impact
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Reference: *City of Los Angeles General Plan Safety Element; L.A. CEQA Thresholds Guide* (Section K.2)

Comment: A significant impact may occur if the proposed project required the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

Los Angeles City Fire Station 2 is located approximately 0.3 miles north of the project site at 1962 East Cesar Avenue. Los Angeles City Fire Station 25 is located approximately 0.8 miles southwest of the project site at 2927 Whittier Boulevard.

The proposed project would not require additional fire protection or emergency response services beyond what is currently provided. In compliance with BOE Standard Project Specifications, construction activities would comply with applicable Municipal Code requirements. The nearest local fire responders would be notified, as appropriate, during construction so as to coordinate emergency response routing during construction. Therefore, the proposed project would result in less than significant impacts related to fire protection. No further analysis of this issue is required.

- b) Police protection?

Reference: *City of Los Angeles General Plan Safety Element; L.A. CEQA Thresholds Guide* (Section K.1)

Comment: 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.

The Hollenbeck Community Police Station is located approximately 0.3 miles north of the project site at 2111 E 1st Street.

The proposed project would not require additional police protection beyond what is currently provided. The local police station would be notified, as appropriate, during construction so as to coordinate emergency response routing during construction. Therefore, the proposed project would result in less than significant impacts related to police protection. No further analysis of this issue is required.

- c) Schools?

Reference: *L.A. CEQA Thresholds Guide* (Section K.3)

Comment: A significant impact may occur if the proposed project included 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.

Schools in the vicinity of the proposed project include St. Mary Catholic School, Breed Street Elementary School, Hollenbeck Middle School, Boyle Heights High School, School of Santa Isabella, Bishop Mora Salesian High School, Soto Street Elementary School, Dolores Mission School, and Second Street Elementary School. The proposed project consists of improvements to an existing recreational and park facility. Access to St. Mary School (located at 416 South Saint Louis Street) across the project site would not be impacted. The proposed project would result in no temporary impacts related to school access.

The proposed project is not a growth-inducing project, and would therefore not increase the demand for schools in the area. Therefore, the proposed project would result in no permanent impacts related to schools. No further analysis of this issue is required.

- d) Parks?

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Reference: *L.A. CEQA Thresholds Guide* (Section K.4)

Comment: 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.

During the 13-month construction, a portion of Hollenbeck Park (i.e., the lake area, shoreline, and adjacent sloping areas) would be closed to the public and could potentially result in a temporary increase in the demand on other parks in the project area (see XV, Recreation, below). Operation of the proposed project would not induce population growth or the construction of new housing, either directly or indirectly, and therefore, would not increase the demand for parks in the project area. Therefore, the proposed project would result in less than significant impacts related to parks. No further analysis of this issue is required.

- e) Other public facilities?

Reference: *L.A. CEQA Thresholds Guide* (Section K.5)

Comment: The proposed project consists of improvements to an existing recreational and park facility.

During construction, a temporary increase in park demand in the project area may result as a portion of the park (i.e., the lake area, shoreline, and adjacent sloping areas) would be closed to the public for 13 months during construction. Operation of the park would not induce growth, either directly or indirectly, and is therefore not anticipated to increase the demand or use for other public facilities in the project area. The proposed project would result in less than significant impacts related to other public facilities. No further analysis of this issue is required.

XV. 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?

Reference: *L.A. CEQA Thresholds Guide* (Section K.4)

Comment: A significant impact may occur if the proposed project included substantial employment or population growth that generated demand for public park facilities that exceed the capacity of existing parks.

The proposed project would not directly or indirectly induce population growth. Therefore, operation of the proposed project would not result in an increase in the demand for parks or other recreational facilities in the project area. However, a portion of the park (i.e., the lake area, shoreline, and adjacent sloping areas) would be closed to the public during the construction phase potentially resulting in a temporary increase in the demand on other parks in the project area. Therefore, the proposed project may result in potentially significant impacts related to parks and recreational facilities. Further analysis of this issue is required.

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

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Reference: *L.A. CEQA Thresholds Guide* (Section K.4)

Comment: See comment XV (a) above.

XVI. TRANSPORTATION/TRAFFIC — Would the project:

- a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Reference: *L.A. CEQA Thresholds Guide* (Section L.1, L.2, L.3, L.4, and L.8)

Comment: A significant impact may occur if the proposed project caused an increase in traffic that would be substantial in relation to the existing traffic load and capacity of the street system taking into account all relevant components of the circulation system.

The proposed project consists of improvements to an existing recreational and park facility. Construction of these improvements would result in a temporary increase in traffic associated with construction and material delivery and haul vehicles. Therefore, the proposed project may result in potentially significant impacts related to a temporary increase in traffic trips during construction. A traffic impact analysis would be prepared for the construction phase of the proposed project to evaluate potential impacts, and then identify feasible mitigation measures as necessary to address any effects on intersections, streets, highways, and other components of the circulation system. These impacts would be further reduced with the application of a Transportation Management Plan. Further analysis of this issue is required.

Operations of the park, including access, hours of operation, and number of patrons expected, would not be altered with the implementation of the proposed project. Long-term vehicle traffic trips would not increase with the proposed project, this no impacts would occur during the operations phase.

- 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?

Reference: *L.A. CEQA Thresholds Guide* (Section L.1, L.2, and L.3); Los Angeles County Congestion Management Program (CMP)

Comment: A significant impact may occur if the proposed project caused a conflict with an applicable congestion management program established by the county congestion management agency for designated roads or highways.

The guidance in the Los Angeles County CMP generally applies to permanent impacts. While there may be effects during the construction, due to the increased number of truck traffic trips, these are expected to be temporary in nature. The operations of the park, including access, hours of operation, and number of patrons expected, would not be altered with the implementation of the proposed project. Long-term vehicle traffic trips would not increase with the proposed project. Therefore, less than significant impacts to anticipated. No further analysis of this issue is required.

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- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Reference: Not Addressed

Comment: The proposed project involves the implementation of improvements to a community recreational park facility and would not involve any changes in air traffic patterns. Therefore, the proposed project would result in no impacts related to air traffic patterns. No further analysis of this issue is required.

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Reference: Not Addressed

Comment: A significant impact may occur if the proposed project substantially increased road hazards due to a design feature or incompatible uses.

The proposed project does not propose any permanent changes to the surrounding street system and would not introduce incompatible vehicles to surrounding roadways. The proposed project would not alter the operations of the existing project site. Temporary traffic control measures proposed for construction would be subject to review, including approval by Los Angeles Department of Transportation. Therefore, the proposed project would result in no impacts related to traffic hazards. No further analysis of this issue is required.

- e) Result in inadequate emergency access?

Reference: *L.A. CEQA Thresholds Guide* (Section L.5)

Comment: A significant impact may occur if the proposed project resulted in inadequate emergency access.

The proposed project area is accessible from adjacent roadways. The proposed project does not include any permanent changes or alterations to emergency access. During construction, temporary lane changes would be subject to Los Angeles Department of Transportation review and approval, to ensure appropriate emergency access is maintained. Therefore, the proposed project would result in less than significant impacts related to emergency access during construction. After construction, access around adjacent roadways would be restored to existing conditions. No further analysis of this issue is required.

- 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?

Reference: *L.A. CEQA Thresholds Guide* (Section L.6)

Comment: A significant impact may occur if the proposed project were to conflict with adopted policies, plans, or programs supporting alternative transportation.

Construction of the proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation. Operation and access to Hollenbeck Park would not be altered with the implementation of the proposed project. No further analysis of this issue is required.

XVII. UTILITIES AND SERVICE SYSTEMS — Would the project:

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- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Reference: *L.A. CEQA Thresholds Guide* (Section M.2)

Comment: A significant impact may occur if the proposed project exceeded wastewater treatment requirements of the local regulatory governing agency.

The Hyperion Treatment Plant is located on a 144-acre site adjacent to the Santa Monica Bay, southwest of the Los Angeles International Airport. The drainage area served by this wastewater treatment plant is approximately 328,000 acres. Sewage from five major interceptor sewer systems is received and treated at this plant. Minimal amounts of wastewater are anticipated to be generated by the proposed project. It is anticipated that the Hyperion Treatment Plant and associated sewer system would have the capacity to accommodate the proposed project. No changes in the demands on the plant and sewer system are anticipated. Therefore, the proposed project would result in less than significant impacts related to wastewater treatment. No further analysis of this issue is required.

- 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?

Reference: *L.A. CEQA Thresholds Guide* (Section G.1, M.1, and M.2)

Comment: 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.

The proposed project would not require the use of large amounts of water demanding the construction or expansion of water treatment facilities. An existing sewer line that extends beneath HPL would be abandoned and a new 18-inch RCP sewer line would be installed along Saint Louis Street, Hollenbeck Drive, and Boyle Avenue, around the outside of the park. However, construction of this sewer line relocation would not cause significant environmental effects. No further analysis of this issue is required.

- c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Reference: *L.A. CEQA Thresholds Guide* (Section G.1 and M.2)

Comment: 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.

The proposed project would divert dry/wet weather flow and divert and treat Caltrans runoff from I-5 to the lake, in addition to recycled water, to replace potable water use. This would result in a minor alteration of drainage facilities in the vicinity. Therefore, the proposed project would result in less than significant impacts related to storm water drainage facilities. No further analysis of this issue is required.

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

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Reference: *L.A. CEQA Thresholds Guide* (Section M.1)

Comment: A significant impact may occur if the proposed project's water demands would exceed the existing water supplies that serve the site.

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. An objective of the proposed project is to divert dry/wet weather flow to the lake, in addition to recycled water, to replace potable water used to replenish the lake. Therefore, the proposed project would result in less than significant impacts related to water supplies. No further analysis of this issue is required.

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| e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Reference: *L.A. CEQA Thresholds Guide* (Section K.2)

Comment: Refer to comment XVII (a), above.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Reference: *L.A. CEQA Thresholds Guide* (Section K.3); California Department of Resources Recycling and Recovery (CalRecycle)

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.

Excavated material and debris would be temporarily generated during construction and would be disposed of at local landfills, including El Sobrante Landfill, Sunshine Canyon Landfill, and Chiquita Canyon Landfill. The soil on the project site is not known to be contaminated. During operation, trash and debris collected from Hollenbeck Park would be nominal in volume and similar to existing conditions. Existing landfills have sufficient capacity to accommodate the amount of solid waste from the proposed project. Therefore, the proposed project would result in less than significant impacts related to solid waste disposal. No further analysis of this issue is required.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Reference: *L.A. CEQA Thresholds Guide* (Section M.3)

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.

Solid waste disposal during construction and operation would comply with federal, state, local statutes and regulations related to solid waste. Therefore, no impacts are anticipated and no further analysis of this issue is required.

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XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

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| <p>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?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

Reference: Preceding analyses

Comment: See comments for IV (a) through (e) above related to biological resources. The construction phase of the proposed project has the potential to impact fish or wildlife habitat on the project site. However, to reduce any potential effects, mitigation measures would be implemented. Further analysis of this issue is required.

See comments for V (a) through (d) above related to cultural resources. A cultural resources records search would be prepared for the proposed project, and would include review of the NRHP online database and California Register, California Historical Landmarks, and California Points of Historical Interest. Mitigation measures would be required to ensure that no historical, archaeological, or unique paleontological resources are adversely impacted by construction of the proposed project. However, further technical analysis of historical resources is needed to identify what resources are present, and to determine mitigation measures that would reduce any impacts on cultural resources. Further analysis of this issue is required.

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| <p>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)?</p> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|

Reference: Preceding analyses

Comment: The proposed project may result in potentially significant impacts in the areas of air quality and GHG emissions due to the large number of heavy duty construction trucks and off-road construction equipment needed for construction activities. If feasible, mitigation measures would be proposed to reduce impacts to a less than significant level. However, there is the potential for these impacts to result in cumulatively considerable temporary construction impacts. Further analysis of this issue is required.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <p>c) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals”</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Reference: Preceding analyses

Comment: An objective of the proposed project is improve water quality and control algae at HPL and contribute to water quality improvement in the Los Angeles River Watershed. These water quality improvements would provide long-term benefits to the environment. In this respect, the proposed project would not have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. No further analysis of this issue is required.

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

Reference: Preceding analyses

Comment: The proposed project has the potential to cause substantial adverse effects on human beings directly or indirectly during the construction phase of the proposed project. Further technical analysis in the areas of air quality, water quality, noise, and transportation and traffic would determine feasible mitigation measures to reduce any impacts on human beings.

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V. PREPARATION AND CONSULTATION

A. Preparer

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B. Coordination and Consultation

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Wing Tam, Assistant Division Manager

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VI. DETERMINATION – RECOMMENDED ENVIRONMENTAL DOCUMENTATION

The proposed project is located at 415 South Saint Louis Street in the Boyle Heights community, and Council District 14, of the City of Los Angeles.

The main objectives of the proposed project are to:

- Improve water quality and control algae at HPL and contribute to water quality improvement in the Los Angeles River Watershed.
- Replace potable water use at HPL for irrigation and lake replenishment with dry/wet weather flow diversion and recycled water.
- Provide a long-term solution to erosion around the lake's edge.
- Restore Hollenbeck Park's appearance and function for aesthetic and recreational public uses for the community.

HPL has a history of water quality concerns attributable to nutrient and sediment loading as well as site-specific factors. Visually, one can readily discern that HPL water is turbid, with a limited transparency of 1 to 2 feet, indicating the presence of high populations of algal cells. Two decades have passed since the operation of the treatment systems installed at HPL, with the exception of the fountain recirculation system, and available information indicates that sediment has deepened and that internal cycling of nitrogen and phosphorus from the sediments to the water column continues within HPL. This situation has elevated the algal populations and contributed to a deterioration in lake water quality through eutrophication and a decrease in dissolved oxygen. There is also extensive erosion around the perimeter of HPL, most notable along the vegetated areas between the lake edge and existing pedestrian walkway. This erosion has begun to undermine the existing pavement, compromising visitor safety. The erosion is likely a result of the steep slopes around the lake, which produce erosive velocities for stormwater and irrigation runoff.

The proposed project includes the following key components:

- **Replacement of Potable Water.** Recycled water is recommended to replace potable water use for irrigation and lake replenishment. The use of recycled water for irrigation already meets irrigation standards and would not require additional treatment. However, the use of recycled water for lake replenishment would require additional treatment, which can be integrated into park shoreline and public use features. The recycled water would be routed to tie into the irrigation system directly, as well as to the shoreline wetlands before being used for lake replenishment and potential future downstream uses.
- **Dry/Wet Weather Flow Diversion.** Dry weather flows and a portion of storm flows would be diverted and treated by the proposed shoreline wetlands at the lake. At the north side of the lake, a diversion structure with a wet weather well and pump would be constructed to connect to the existing storm drain. Diverted flows would be pretreated and pumped to the wetland system, or directly to the lake prior to the construction of the wetlands. Pretreatment by a hydrodynamic separator would screen, separate and remove trash, debris, sediment, and hydrocarbons from stormwater runoff.
- **Caltrans Diversion.** Additional treatment area from Caltrans right-of-way would be diverted and discharged to the lake. A total of 4.0 acres of runoff from the I-5 bridge would be piped to the lake and treated by the in-lake treatment system of floating wetland islands, aeration, chemical feed system, and recirculation. The existing Caltrans flow connects to a drainage system underneath the lake.

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- **Processing.** A new submersible pump would be placed in the existing wet well that recirculates water from the lake. The recirculated water would be filtered and disinfected before distribution to the irrigation system. All processing equipment would be pre-assembled onto a high-density polyethylene processing skid located aboveground. The equipment skid is housed in a high-density polyethylene enclosure sized to contain the filtration and disinfection equipment, system controls, and irrigation controller. The processing skid would contain the treatment system and the control system.
- **Shoreline Wetlands.** Shoreline wetlands are included as a two-stage process to create an ecological habitat that would provide passive improvement of water quality through phosphorus uptake and assimilation, nitrogen transformation through denitrification, solids reduction through sedimentation and burial, algal control through shading and competition, and sequestration of metals as immobile and ecologically unavailable forms in wetland sediments. The new water supply (i.e., recycled water and dry/wet weather flow diversion) would be routed to the shoreline wetlands. In addition, stormwater and irrigation runoff from the park would be collected by a vegetated swale and routed to the shoreline wetlands. Water would be distributed through a gravel filter situated under a new pedestrian-friendly sidewalk, and discharged into a constructed shoreline wetland for final polishing before inflow to the lake.
- **Dewatering/Dredging.** Dredging of existing lake sediments would significantly improve water quality. Dredging can be performed using mechanical methods after the lake has been drained.
- **Lining.** A geosynthetic liner is recommended to eliminate seepage and significantly reduce the water demands at HPL. The geosynthetic liner has lower capital and installation costs compared with other materials.
- **Irrigation and Landscaping.** Water conservation methods can be applied to increase irrigation system water use efficiency. A key opportunity for HPL is the use of water-wise landscape vegetation consisting of native, drought tolerant trees, shrubs, and mulch and smart irrigation controllers (with weather and soil moisture sensors).
- **Sewer Replacement.** An existing sewer line that extends beneath the lake would be abandoned and a new 18-inch reinforced concrete pipe (RCP) sewer line would be installed along Saint Louis Street, Hollenbeck Drive, and Boyle Avenue, around the outside of the park.

As described in this Initial Study, the proposed project may result in significant impacts and would require the implementation of mitigation measures. Further analysis of these environmental issues should be provided in an EIR.

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Recommended Environmental Documentation

On the basis of this initial evaluation, the proposed project may have a significant effect on the environment, and an Environmental Impact Report should be prepared.

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VII. REFERENCES

- California Assembly Bill (AB) 52 Native Americans: California Environmental Quality Act at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB52
- California Department of Conservation – Division of Land Resource Protection
- California Department of Conservation Publication 42
- California Department of Conservation Seismic Hazard Zones Map – Los Angeles Quadrangle
- California Department of Transportation, California Scenic Highway Mapping System
- California Department of Toxic Substance Control, *EnviroStor*
- CH2M, Hollenbeck Park Lake Rehabilitation and Stormwater Management Final Concept Report, 2016
- City of Los Angeles, *Boyle Heights Community Plan (November 10, 1998)*
- City of Los Angeles Cultural Heritage Commission “Historic-Cultural Monuments (HCM) Report by Planning Community”
- City of Los Angeles Department of Public Works, Watershed Management – Los Angeles River Watershed at <http://ladpw.org/wmd/watershed/LA/>
- City of Los Angeles Department of Public Works, *Standard Specification for Public Works Construction*
- City of Los Angeles, *City of Los Angeles General Plan*
- City of Los Angeles, *L.A. CEQA Thresholds Guide*, 2006.
- City of Los Angeles Municipal Code, Chapter I (Planning and Zoning Code) at [http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120405osopenspacezone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz_ca\\$anc=JD_12.04.05](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120405osopenspacezone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.04.05) and [http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120409pfppublicfacilitieszone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz_ca\\$anc=JD_12.04.09](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120409pfppublicfacilitieszone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.04.09)
- City of Los Angeles, Zone Information and Map Access System (ZIMAS) at <http://zimas.lacity.org/>
- FEMA, Flood Insurance Rate Map No. 06037C1637F and 06037C1636F, September 26, 2008 at <https://msc.fema.gov/portal>
- Los Angeles County Congestion Management Program
- Office of Planning and Research
- South Coast Air Quality Management District – CEQA Air Quality Analysis Guidance <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>
- State of California, Uniform Building Code
- State Water Resources Control Board, *GeoTracker*