IV. Environmental Impact Analysis
H. Hydrology and Water Quality

1. Introduction

This section analyzes the Project's potential impacts on hydrology (drainage flows), surface water quality, groundwater levels, and groundwater quality. The analysis is based on the Water Resources Technical Report prepared for the Project by Fuscoe Engineering Inc,[1] and included in Appendix G of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding hydrology and water quality at the federal, state, regional, and local levels. Described below, these include:

- Clean Water Act
- Federal Antidegradation Policy
- Safe Drinking Water Act
- National Flood Insurance Program
- Porter-Cologne Water Quality Act (California Water Code)
- California Antidegradation Policy
- California Toxics Rule
- Sustainable Groundwater Management Act of 2014
- Water Replenishment District of Southern California
- County of Los Angeles Hydrology Manual

[1] *Fuscoe Engineering, Inc., Water Resources Technical Report, Buena Vista, 1251 North Spring Street & 1030–1380 North Broadway, May 15, 2025.*

- National Pollutant Discharge Elimination System Permit Program
- Los Angeles River Watershed Master Plan
- Los Angeles Municipal Code Section 62.105, Construction "Class B" Permit
- Los Angeles Municipal Code Sections 12.40 through 12.43, Landscape Ordinance
- Los Angeles Municipal Code Section 64.70, Stormwater and Urban Runoff Pollution Control Ordinance
- Los Angeles Municipal Code Section 64.72, Stormwater Pollution Control Measures for Development Planning and Construction Activities
- Low Impact Development Ordinance
- Water Quality Compliance Master Plan for Urban Runoff
- Stormwater Program—Los Angeles County MS4 Permit Citywide Implementation
- Flood Hazard Management Ordinance

(1) Federal

(a) Clean Water Act

The Clean Water Act (CWA), formerly known as the Federal Water Pollution Control Act, was first introduced in 1948, with major amendments in the 1960s, 1970s, and 1980s.[2] The CWA authorizes federal, state, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. Amendments to the CWA in 1972 established the National Pollutant Discharge Elimination System (NPDES) permit program, which prohibits discharge of pollutants into the nation's waters without procurement of a NPDES permit from the United States Environmental Protection Agency (USEPA). The purpose of the permit is to translate general requirements of the CWA into specific provisions tailored to the operations of each organization that is discharging pollutants. Although federally mandated, the NPDES permit program is generally administered at the state and regional levels.

The USEPA NPDES Program requires NPDES permits for: (1) Municipal Separate Storm Sewer Systems (MS4) generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) 11 specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or

[2] *U.S. Environmental Protection Agency, Clean Water Act, November 2002.*

more of land. As of March 2003, Phase II of the NPDES Program extended the requirements for NPDES permits to numerous small MS4s, construction sites of one to five acres, and industrial facilities owned or operated by small municipal separate storm sewer systems, which were previously exempted from permitting.

(b) Federal Antidegradation Policy

The Federal Antidegradation Policy has been incorporated within the CWA and requires states to develop statewide antidegradation policies and identify methods for implementing them.[3] Pursuant to the Code of Federal Regulations (CFR), state antidegradation policies and implementation methods must, at a minimum, protect and maintain: (1) existing in-stream water uses; (2) existing water quality, where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource.

(c) Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) is the main federal law that ensures the quality of the Nation's drinking water.[4] The SDWA was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply and its sources, including rivers, lakes, reservoirs, springs, and groundwater wells. Under the SDWA, the USEPA sets standards for drinking water quality and oversees the states, localities, and water suppliers that implement those standards. The SDWA regulates contaminants of concern in domestic water supply, including the maximum contaminant levels (MCLs), and that the USEPA has delegated the California Department of Public Health the responsible agency for administering California's drinking water program. MCLs are established under California Code of Regulations (CCR) Title 22, Div. 4, Ch. 15, Article 4 (Title 22 Standards).

(d) National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate the Federal Emergency Management Agency (FEMA) to evaluate flood hazards.[5] FEMA provides flood insurance rate maps (FIRMs) for local and regional planners to promote sound land use and development practices, by identifying potential flood areas

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[3] *U.S. Environmental Protection Agency, Water Quality Standards Handbook, Chapter 4: Antidegradation, 2010.*

[4] *United States Code, Title 42—The Public Health and Welfare, Chapter 6A Public Health and Service, Safe Drinking Water Act. 2006 Edition, Supplement 4, https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter6A/subchapter12&edition=prelim, accessed January 30, 2024.*

[5] *The National Flood Insurance Act of 1968, as amended, and The Flood Disaster Protection Act of 1973, 42 U.S.C. 4001 et. seq.*

based on the current conditions. To delineate a FIRM, FEMA conducts engineering studies referred to as flood insurance studies (FIS). Using information gathered in these studies, FEMA engineers and cartographers delineate special flood hazard areas (SFHA) on FIRMs.

The Flood Disaster Protection Act requires owners of all structures within identified SFHAs to purchase and maintain flood insurance as a condition of receiving federal or federally-related financial assistance, such as mortgage loans from federally-insured lending institutions. Community members within designated areas are able to participate in the National Flood Insurance Program (NFIP) afforded by FEMA.

(2) State

(a) Porter-Cologne Water Quality Control Act (California Water Code)

The Porter-Cologne Water Quality Control Act established the legal and regulatory framework for California's water quality control.[6] The California Water Code (CWC) authorizes the State Water Resources Control Board (SWRCB) to implement the provisions of the CWA, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants. In California, the NPDES stormwater permitting program is administered by the SWRCB.

Under the CWC, the State of California is divided into nine Regional Water Quality Control Boards (RWQCBs), which govern the implementation and enforcement of the CWC and the CWA. The Project Site is located within Region 4, also known as the Los Angeles RWQCB (LARWQCB). The RWQCBs develop and enforce water quality objectives and implement plans that will best protect California's waters, acknowledging areas of different climate, topography, geology, and hydrology. Each RWQCB is required to formulate and adopt a Water Quality Control Plan or Basin Plan for its region. The Basin Plan establishes beneficial use definitions for the various types of water bodies, and serves as the basis for establishing water quality objectives, discharge conditions and prohibitions, and must adhere to the policies set forth in the CWC and established by the SWRCB. In this regard, the LARWQCB issued the Los Angeles Basin Plan on August 29, 2014, for the Coastal Watersheds of Los Angeles and Ventura Counties, with subsequent amendments. The RWQCB is also given authority to issue waste discharge requirements, enforce actions against stormwater discharge violators, and monitor water quality.[7]

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[6] *State Water Resources Control Board, Porter-Cologne Water Quality Control Act, 2018.*

[7] *U.S. Environmental Protection Agency, State Review Framework, last updated October 6, 2023, www.epa.gov/compliance/state-review-framework-compliance-and-enforcement-performance, accessed April 29, 2025.*

(b) California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB in 1968.[8] Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the state, not just surface waters. The policy states that, whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained and discharges to that water body shall not unreasonably affect present or anticipated beneficial use of the water resource.

(c) California Toxics Rule

In 2000, the California Environmental Protection Agency (CalEPA) promulgated the California Toxics Rule, which establishes water quality criteria for certain toxic substances to be applied to waters in the state.[9] CalEPA promulgated this rule based on CalEPA's determination that the numeric criteria of specific concentrations of regulated substances are necessary for the state to protect human health and the environment. The California Toxics Rule establishes acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water, such as inland surface waters and enclosed bays and estuaries, that are designated by the LARWQCB as having beneficial uses protective of aquatic life or human health.

(d) Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act of 2014 (SGMA) requires the designation of groundwater sustainability agencies (GSAs) by one or more local agencies and the adoption of groundwater sustainability plans (GSPs) for basins designated as medium- or high-priority by the California Department of Water Resources (DWR). SGMA grants new powers to GSAs, including the power to adopt rules, regulations, ordinances, and resolutions; regulate groundwater extractions; and to impose fees and assessments. SGMA also allows the SWRCB to intervene if local agencies will not or do not meet the SGMA requirements, in addition to mandating that critically overdrafted basins be sustainable by 2040, and medium- or high-priority by 2042.

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[8] *California State Water Resources Control Board, State Board Resolution No. 68-16, October 1968.*

[9] *U.S. Environmental Protection Agency, Water Quality Standards, Establishment of Numeric Criteria for Priority Toxic Pollutants for the State of California, last updated October 8, 2024, www.epa.gov/wqs-tech/water-quality-standards-establishment-numeric-criteria-priority-toxic-pollutants-state, accessed April 29, 2025.*

(3) Regional

(a) Water Replenishment District of Southern California

The City of Los Angeles (City) is included within the Coastal Plain of Los Angeles—Central Basin, which is overseen by the Water Replenishment District of Southern California (WRD). The Central Basin is categorized as a Very Low Priority basin.[10] As discussed above, although SGMA applies to all basins in California, only high- and medium-priority basins are required to form a GSA and adopt a GSP or submit an alternative to a GSP. Low- and very low-priority basins may adopt these plans but are not required to.

(b) County of Los Angeles Hydrology Manual

Drainage and flood control in the City are subject to review and approval by the Department of Public Works, Bureau of Engineering (Bureau of Engineering). Storm drains within the City are constructed by both the City and the Los Angeles County Flood Control District (County Flood Control). The County Flood Control constructs and has jurisdiction over regional facilities, such as major storm drains and open flood control channels, while the City constructs and is responsible for local interconnecting tributary drains.

Per the City's Special Order No. 007-1299, December 3, 1999, the City has adopted the Los Angeles County Department of Public Works' Hydrology Manual as its basis of design for storm drainage facilities.[11] The Department of Public Works' Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The County also limits the allowable discharge into existing storm drain (MS4) facilities based on the County's MS4 Permit, which is enforced on all new developments that discharge directly into the County's MS4 system.

Drainage and flood control structures and improvements within the City are subject to review and approval by the City's Department of Public Works and Department of Building and Safety. As required by the Department of Public Works, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The Department of Public Works reviews and approves MS4 plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned MS4 facilities, such as catch basins and drainage lines, require approval from County Flood Control to ensure compliance with the County's Municipal NPDES Permit requirements.

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[10] *Sustainable Groundwater Management Act 2019 Basin Prioritization, Department of Water Resources, May 2020.*

[11] *Los Angeles County Department of Public Works, Hydrology Manual, January 2006.*

(c) NPDES Permit Program

As indicated above, in California, the NPDES stormwater permitting program is administered by the SWRCB through its nine RWQCBs. This NPDES permit, General Permit for Stormwater Discharges from Construction Activities by the SWRCB (Construction General Permit), establishes a risk-based approach to stormwater control requirements for construction projects.

(i) Construction: Stormwater Pollution Prevention Plan

For all construction activities disturbing one acre of land or more, California mandates the development and implementation of Stormwater Pollution Prevention Plans (SWPPP). The SWPPP documents the selection and implementation of best management practices (BMPs) to prevent discharges of water pollutants to surface or groundwater. The SWPPP also charges owners with stormwater quality management responsibilities. The developer or contractor for a construction site subject to the Construction General Permit must prepare and implement a SWPPP that meets the requirements of the Construction General Permit.[12] The purpose of an SWPPP is to identify potential sources and types of pollutants associated with construction activity and list BMPs that would prohibit pollutants from being discharged from the construction site into the public stormwater system. BMPs typically address stabilization of construction areas, minimization of erosion during construction, sediment control, control of pollutants from construction materials, and post-construction stormwater management (e.g., the minimization of impervious surfaces or treatment of stormwater runoff). The SWPPP is also required to include a discussion of the proposed program to inspect and maintain all BMPs. A site-specific SWPPP could include, but not be limited to, the following BMPs:

- Erosion Control BMPs—to protect the soil surface and prevent soil particles from detaching. Selection of the appropriate erosion control BMPs would be based on minimizing areas of disturbance, stabilizing disturbed areas, and protecting slopes/channels. Such BMPs may include, but would not be limited to, use of geotextiles and mats, earth dikes, drainage swales, and slope drains.

- Sediment Control BMPs—are treatment controls that trap soil particles that have been detached by water or wind. Selection of the appropriate sediment control BMPs would be based on keeping sediments on-site and controlling the site boundaries. Such BMPs may include, but would not be limited to, use of silt fences, sediment traps, and sandbag barriers, street sweeping and vacuuming, and storm drain inlet protection.

[12] *Construction Stormwater Program, State Water Resources Control Board, last updated February 21, 2025, www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html, accessed April 29, 2025.*

- Wind Erosion Control BMPs—consist of applying water to prevent or minimize dust nuisance.

- Tracking Control BMPs—consist of preventing or reducing the tracking of sediment off-site by vehicles leaving the construction area. These BMPs include street sweeping and vacuuming. Project sites are required to maintain a stabilized construction entrance to prevent off-site tracking of sediment and debris.

- Non-Stormwater Management BMPs—also referred to as "good housekeeping practices," involve keeping a clean, orderly construction site.

- Waste Management and Materials Pollution Control BMPs—consist of implementing procedural and structural BMPs for handling, storing, and disposing of wastes generated by a construction project to prevent the release of waste materials into stormwater runoff or discharges through the proper management of construction waste.

The SWRCB adopted a General Permit for Stormwater Discharges from Construction Activities on September 2, 2009, and amended the permit on September 8, 2022 (Order WQ 2022-0057-DWQ, General NPDES Permit No. CAS000002). The Construction General Permit regulates construction activity, including clearing, grading, and excavation of areas one acre or more in size, and prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance, unless a separate NPDES permit has been issued for those discharges.

To obtain coverage under the Construction General Permit, a developer is required to file a Notice of Intent (NOI) with the appropriate RWQCB and provide proof of the NOI prior to applying for a grading or building permit from the local jurisdiction and must prepare a State SWPPP that incorporates the minimum BMPs required under the permit, as well as appropriate project-specific BMPs. The SWPPP must be completed and certified by the developer and BMPs must be implemented prior to the commencement of construction, and may require modification during the course of construction as conditions warrant. When project construction is complete, the developer is required to file a Notice of Termination with the RWQCB certifying that all the conditions of the Construction General permit, including conditions necessary for termination, have been met.

(ii) NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering

Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location to proceed with construction into the drainage system. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. An NPDES Permit for dewatering discharges was adopted by the LARWQCB

on December 21, 2023 (Order No. R4-2023-0429, General NPDES Permit No. CAG994004) that went into effect on March 21, 2024. Similar to the Construction General Permit, to be authorized to discharge under this permit, the developer must submit a NOI to discharge groundwater generated from dewatering operations during construction in accordance with the requirements of this Permit and shall continue in full force until it expires March 21, 2029.[13] In accordance with the NOI, among other requirements and actions, the discharger must demonstrate that the discharges shall not cause or contribute to a violation of any applicable water quality objective/criteria for the receiving waters and perform reasonable potential analysis using a representative sample of groundwater or wastewater to be discharged. The discharger must obtain and analyze (using appropriate methods) a representative sample of the groundwater to be treated and discharged under the Order. The analytical method used shall be capable of achieving a detection limit at or below the minimum level. The discharger must also provide a feasibility study on conservation, reuse, and/or alternative disposal methods of the wastewater and provide a flow diagram of the influent to the discharge point.[14]

(iii) Operation: Los Angeles County Municipal Stormwater NPDES Program

The County of Los Angeles and the City are two of the Co-Permittees under the Los Angeles County MS4 Permit (Order No. R4-2012-0175 [as amended by SWRCB Order WQ 2015-0075], NPDES Permit No. CAS004001). The Los Angeles County MS4 Permit has been determined by the SWRCB to be consistent with the requirements of the CWA and the Porter-Cologne Act for discharges through the public storm drains in Los Angeles County to statutorily-defined waters of the U.S. (33 United States Code [USC] §1342(p); 33 CFR Part 328.11). On September 8, 2016, the LARWQCB amended the Los Angeles County MS4 Permit to incorporate modifications consistent with the revised Ballona Creek Watershed Trash Total Maximum Daily Load (TMDL) and the revised Los Angeles River Watershed Trash TMDL, among other TMDLs incorporated into the Los Angeles County MS4 Permit and the Basin Plan for the Coastal Waters of Los Angeles and Ventura Counties.

Under the amended Los Angeles County MS4 Permit, permittees are required to implement a development planning program to address stormwater pollution. This program requires project applicants for certain types of projects to implement a Low Impact Development (LID) Plan. The purpose of the LID Plan is to reduce the discharge of pollutants in stormwater by outlining BMPs, which must be incorporated into the design of new development and redevelopment. These treatment control BMPs must be sufficiently

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[13] *Los Angeles Regional Water Quality Control Board, Order No. R4-2023-0429, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, December 21, 2023.*

[14] *Los Angeles Regional Water Quality Control Board, Order No. R4-2023-0429, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, December 21, 2023.*

designed and constructed to treat or retain the greater of an 85th percentile rain event or first 0.75 inch of stormwater runoff from a storm event.

The Los Angeles County MS4 Permit (Part VI.D.7.c, New Development/ Redevelopment Project Performance Criteria) includes design requirements for new development and substantial redevelopment. These requirements apply to all projects that create or replace more than 5,000 square feet of impervious cover. Where redevelopment results in an alteration to more than 50 percent of impervious surfaces of a previously existing development and the existing development was not subject to post-construction stormwater quality control requirements, the entire project would be subject to post-construction stormwater quality control measures.

This Enhanced Watershed Management Program for the Upper Los Angeles River (ULAR EWMP) describes a customized compliance pathway that participating agencies will follow to address the pollutant reduction requirements of the Los Angeles County MS4 Permit.[15] By electing the optional compliance pathway in the MS4 Permit, the Upper Los Angeles River Watershed Management Group (EWMP Group) has leveraged this EWMP to facilitate a robust, comprehensive approach to stormwater planning for the Upper Los Angeles River watershed. The objective of the EWMP Plan is to determine the network of control measures (BMPs) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices. The Permit requires the identification of Watershed Control Measures, which are strategies and BMPs that will be implemented through the EWMP, individually or collectively, at watershed-scale to address the Water Quality Priorities. The EWMP Implementation Strategy is used as a recipe for compliance for each jurisdiction to address Water Quality Priorities and comply with the provisions of the MS4 Permit. The EWMP Implementation Strategy includes individual recipes for each of the 18 jurisdictions and each watershed/ assessment area—Los Angeles River above Sepulveda Basin, Los Angeles River below Sepulveda Basin, Compton Creek, Rio Hondo, Verdugo Wash, Arroyo Seco, Burbank Western Channel, Tujunga Wash, Bull Creek, Aliso Wash, Bell Creek, McCoy-Dry Canyon, and Browns Canyon Wash. Implementation of the EWMP Implementation Strategy will provide a BMP-based compliance pathway for each jurisdiction under the MS4 Permit. The permit specifies that an adaptive management process will be revisited every two years to evaluate the EWMP and update the program. The EWMP strategy will evolve based on monitoring results by identifying updates to the EWMP Implementation Plan to increase its effectiveness.

The Los Angeles County MS4 Permit contains provisions for implementation and enforcement of the Stormwater Quality Management Program. The objective of the Stormwater Quality Management Program is to reduce pollutants in urban stormwater

[15] *Upper Los Angeles River Watershed Management Group, Enhanced Watershed Management Program, January 2016*.

discharges to the "maximum extent practicable" to attain water quality objectives and protect the beneficial uses of receiving waters in Los Angeles County. Special provisions are provided in the Los Angeles County MS4 Permit to facilitate implementation of the Stormwater Quality Management Program. In addition, the Los Angeles County MS4 Permit requires that permittees implement a LID Plan, as discussed above, that designates BMPs that must be used in specified categories of development projects to infiltrate water, filter, or treat stormwater runoff; control peak flow discharge; and reduce the post-project discharge of pollutants into stormwater conveyance systems. In response to the Los Angeles County MS4 Permit requirements, the City adopted Ordinance No. 173,494 (Stormwater Ordinance), as authorized by LAMC Section 64.72.

The City supports the requirements of the Los Angeles County MS4 Permit through the City of Los Angeles' *Development Best Management Practices Handbook, Low Impact Development Manual, Part B: Planning Activities* (5th edition, May 2016) (LID Handbook),[16] which provides guidance to developers to ensure the post-construction operation of newly developed and redeveloped facilities comply with the Developing Planning Program regulations of the City's Stormwater Program. The LID Handbook assists developers with the selection, design, and incorporation of stormwater source control and treatment control BMPs into project design plans, and provides an overview of the City's plan review and permitting process. The City of Los Angeles passed Ordinance No. 188,125 on February 20, 2024, which amends Section 64.72 to establish definitions for "Priority Development and Redevelopment Projects" for which LID provisions shall be required. Projects which apply for a building or grading permit on or after April 2, 2024, shall be subject to these amendments.

The City implements the requirement to incorporate stormwater BMPs, including LID BMPs, through the City's plan review and approval process. During the review process, project plans are reviewed for compliance with the City's General Plan, zoning ordinances, and other applicable local ordinances and codes, including stormwater requirements. Plans and specifications are reviewed to ensure that the appropriate BMPs are incorporated to address stormwater pollution prevention goals.

(d) Los Angeles River Master Plan

The Los Angeles River Master Plan recognizes the river as a resource of regional importance and that those resources must be protected and enhanced. The Los Angeles River Master Plan was first adopted in 1996, and updated in 2022. The Los Angeles River Master Plan recognizes the need for resilient systems that address the most complex issues facing the Los Angeles region, such as climate change, population growth, resource scarcity,

[16] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for LID, Part B: Planning Activities, 5th Edition, May 2016.*

and social inequity. These resilient systems are necessary to create 51-miles of connected open space that supports clean water, native habitat, parks, recreation, multiuse trails, art, and cultural resources to improve human and ecosystem health, equity, access, mobility, and economic opportunity for the diverse communities of Los Angeles County, while managing flood risk. The Los Angeles River Master Plan seeks to make the reimagined river a reality over the next two and a half decades, connecting people, culture, water, open space, and wildlife across and along this iconic river.[17]

(4) Local

(a) Los Angeles Municipal Code Section 62.105, Construction "Class B" Permit

Proposed drainage improvements within the street rights-of-way or any other property owned by, to be owned by, or under the control of the City require the approval of a B-permit (LAMC Section 62.105). Under the B-permit process, storm drain installation plans are subject to review and approval by the Bureau of Engineering. Additionally, connections to the MS4 system from a property line to a catch basin or a storm drain pipe require a storm drain permit from the Bureau of Engineering.

(b) Los Angeles Municipal Code Sections 12.40 through 12.43, Landscape Ordinance

In 1996, Ordinance No. 170,978 amended LAMC Sections 12.40 through 12.43 to establish consistent landscape requirements for new projects within the City. LAMC Section 12.40 contains general requirements, including a point system for specific project features and techniques in order to determine compliance with the ordinance, and defines exemptions from the ordinance. LAMC Section 12.41 sets minimum standards for water delivery systems (irrigation) to landscapes. LAMC Section 12.43 defines the practices addressed by the ordinance, of which two are applicable to stormwater management. The Heat and Glare Reduction practice states among its purposes the design of vehicular use areas that reduce stormwater runoff and increase groundwater recharge. The Soil and Watershed Conservation practice is intended to encourage the restoration of native areas that are unavoidably disturbed by development; to conserve soil and accumulated organic litter and reduce erosion by utilization of a variety of methods; and to increase the "residence time of precipitation" (i.e., the time between the original evaporation and the returning of water masses to the land surface as precipitation) within a given watershed. Implementation guidelines developed for the ordinance provide specific features and techniques for incorporation into projects, and include water management guidelines addressing runoff, infiltration, and groundwater recharge. This ordinance is incorporated into the LID Ordinance discussed below.

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[17] *Los Angeles River Master Plan, Los Angeles County Public Works, June 2022.*

(c) Los Angeles Municipal Code Section 64.70, Stormwater and Urban Runoff Pollution Control Ordinance

LAMC Section 64.70, the Stormwater and Urban Runoff Pollution Control Ordinance, was added by Ordinance No. 172,176 in 1998 and prohibits the discharge of unauthorized pollutants in the City. The Watershed Protection Program (Stormwater Program) for the City is managed by the Bureau of Sanitation along with all City Flood Protection and Pollution Abatement (Water Quality) Programs, including, but not limited to, regulatory compliance, implementation, operations, reporting and funding. Section 64.70 sets forth uniform requirements and prohibitions for discharges and places of discharge into the storm drain system and receiving waters necessary to adequately enforce and administer all federal and state laws, legal standards, orders and/or special orders that provide for the protection, enhancement, and restoration of water quality. Through a program employing watershed-based approaches, the regulation implements the following objectives:

1. To comply with all Federal and State laws, lawful standards, and orders applicable to stormwater and urban runoff pollution control;

2. To prohibit any discharge which may interfere with the operation of, or cause any damage to the storm drain system, or impair the beneficial use of the receiving waters;

3. To prohibit illicit discharges to the storm drain system;

4. To reduce stormwater runoff pollution;

5. To reduce non-stormwater discharge to the storm drain system to the maximum extent practicable; and

6. To develop and implement effective educational outreach programs designed to educate the public on issues of stormwater and urban runoff pollution.

The ordinance applies to all dischargers and places of discharge that discharge stormwater or non-stormwater into any storm drain system or receiving waters. While this practice is prohibited under the County's Municipal NPDES Permit, adoption of the ordinance allows enforcement by the Department of Public Works, as well as the levy of fines for violations. General Discharge Prohibitions require that no person shall discharge, cause, permit, or contribute to the discharge any hazardous materials and substances (liquids, solids, or gases) into to the storm drain system or receiving waters that constitute a threat and/or impediment to life and the storm drain system, singly or by interaction with other materials. A specific list of prohibited substances can be found under LAMC Section 64.70.

Under LAMC Section 64.70.02 D, Requirement to Prevent, Control, and Reduce Stormwater Pollutants, any owner of a facility engaged in activities or operations as listed in the Critical Sources Categories, Section III of the Board's Rules and Regulations shall be required to implement BMPs as promulgated in the Rules and Regulations. The owner/ developer of a property under construction shall be required to implement the stormwater pollution control requirements for construction activities as depicted in the project plans approved by the Department of Building and Safety. In the event a specified BMP proves to be ineffective or infeasible, additional and/or alternative, site-specific BMPs or conditions deemed appropriate to achieve the objectives of this ordinance as defined in LAMC Section 64.70 B would be implemented.

(d) Los Angeles Municipal Code Section 64.72, Stormwater Pollution Control Measures for Development Planning and Construction Activities

LAMC Section 64.72, Stormwater Pollution Control Measures for Development Planning and Construction Activities, was added by Ordinance 173,494 (LID Ordinance) in 2000 and sets forth requirements for construction activities and facility operations of development and redevelopment projects to comply with the requirements of the NPDES permit requirements. The provisions of this section contain requirements for construction activities and facility operations of development and redevelopment projects to comply with the Land Development requirements of the Los Angeles County MS4 Permit through integrating LID practices and standards for stormwater pollution mitigation, and maximize open, green, and pervious space on all developments and redevelopments consistent with the City's Landscape Ordinance and other related requirements in the *Development Best Management Practices Handbook*.

(e) Low Impact Development Ordinance (No. 181,899)

In 2011, the City adopted a Citywide Low Impact Development Ordinance (LID Ordinance) that amended the City's existing Stormwater Ordinance (LAMC Section Nos. 64.70 and 64.72, discussed above). The LID Ordinance became effective on May 12, 2012. The current City of Los Angeles Planning and Land Development Handbook for LID was published on May 9, 2016. The City of Los Angeles passed Ordinance No. 188,125 on February 20, 2024, which amends Section 64.72 to establish definitions for "Priority Development and Redevelopment Projects" for which LID provisions shall be required. Projects which apply for a building or grading permit on or after April 2, 2024, shall be subject to these amendments.

The LID Ordinance enforces the requirements of the Los Angeles County MS4 Permit. LID is a stormwater management strategy with goals to mitigate the impacts of increased runoff and stormwater pollution as close to their source as possible and that promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of LID practices is to remove nutrients, bacteria, and metals from stormwater while also

reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, and rain barrels that will store, evaporate, detain, and/or treat runoff can be used.[18]

The intent of LID standards is to:

- Require the use of LID practices in future developments and redevelopments to encourage the beneficial use of rainwater and urban runoff;
- Reduce stormwater/urban runoff while improving water quality;
- Promote rainwater harvesting;
- Reduce off-site runoff and provide increased groundwater recharge;
- Reduce erosion and hydrologic impacts downstream; and
- Enhance the recreational and aesthetic values in our communities.

The Citywide LID strategy addresses land development planning, as well as storm drain infrastructure. Toward this end, LID is implemented through BMPs that fall into four categories: site planning BMPs, landscape BMPs, building BMPs, and street and alley BMPs. While the LID Ordinance and the BMPs contained therein comply with Los Angeles County MS4 Permit requirements for stormwater management, the MS4 requirements apply only to proposed new development and redevelopment of a certain size, primarily address stormwater pollution prevention as opposed to groundwater recharge, and vary over time as the permit is reissued every five years. The LID Ordinance provides a consistent set of BMPs that apply to existing, as well as new, development and emphasize natural drainage features and groundwater recharge in addition to pollution prevention in receiving waters. The LID Ordinance requires the capture and management of the greater of an 85th percentile rain event or the first 0.75 inch of runoff flow during storm events defined in the City's LID BMPs, through one or more of the City's preferred LID improvements in priority order: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible.

Per the City's 2016 LID Manual's Figure 3.3 and Section 4.1, the City's preferred LID improvement is on-site infiltration of stormwater, since it allows for groundwater recharge and reduces the volume of stormwater entering municipal drains.[19] If project site conditions

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[18] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for LID, Part B: Planning Activities, 5th Edition, May 2016.*

[19] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for LID, Part B: Planning Activities, 5th Edition, May 2016.*

are not suitable for infiltration, the City requires on-site retention via stormwater capture and reuse. Should capture and reuse be deemed technically infeasible, high efficiency biofiltration/bioretention systems should be utilized. Lastly, under the LID Ordinance (LAMC Section 64.72 C.6), as interpreted in the LID Manual, if no single approach listed in the LID Manual is feasible, then a combination of approaches may be used.[20]

The LID Ordinance applies first to a project in lieu of Standard Urban Stormwater Mitigation Plan (SUSMP) provisions. If a large project cannot meet the requirements of the LID Ordinance, then SUSMP applies instead.

(f) Water Quality Compliance Master Plan for Urban Runoff

The Water Quality Compliance Master Plan for Urban Runoff (Water Quality Compliance Master Plan)[21] was developed by the Department of Public Works, Bureau of Sanitation, Watershed Protection Division, and was adopted in April 2009.

The Water Quality Compliance Master Plan addresses planning, budgeting, and funding for achieving clean stormwater and urban runoff for the next 20 years and presents an overview of the status of urban runoff management within the City. The Water Quality Compliance Master Plan identifies the City's four watersheds; summarizes water quality conditions in the City's receiving waters, as well as known sources of pollutants; summarizes regulatory requirements for water quality; describes BMPs required by the City for stormwater quality management; and discusses related plans for water quality that are implemented within the Los Angeles region, particularly TMDL Implementation Plans and Watershed Management Plans in Los Angeles.

(g) Stormwater Program—Los Angeles County MS4 Permit Citywide Implementation

The Watershed Protection Division of the Department of Public Works, Bureau of Sanitation is responsible for stormwater pollution control throughout the City in compliance with the Los Angeles County MS4 Permit. The Watershed Protection Division administers the City's Stormwater Program, which has two major components: Pollution Abatement and Flood Control. The Watershed Protection Division publishes the two-part *Development Best Management Practices Handbook* that provides guidance to developers for compliance with the Los Angeles County MS4 Permit through the incorporation of water quality management

[20] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for LID, Part B: Planning Activities, 5th Edition, May 2016.*

[21] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for LID, Part B: Planning Activities, 5th Edition, May 2016.*

into development planning.[22] The *Development Best Management Practices Handbook, Part A: Construction Activities*, provides specific minimum BMPs for all construction activities. The *Development Best Management Practices Handbook*, *Low Impact Development Manual, Part B: Planning Activities* (LID Handbook) provides guidance to developers to ensure the post-construction operation of newly developed and redeveloped facilities comply with the Developing Planning Program regulations of the City's Stormwater Program.[23] The LID Handbook assists developers with the selection, design, and incorporation of stormwater source control and treatment control BMPs into project design plans, and provides an overview of the City's plan review and permitting process. The LID Handbook addresses the need for frequent and/or regular inspections of infiltration facilities in order to ensure on-site compliance of BMP standards, soil quality, site vegetations, and permeable surfaces. These inspections are required to guarantee that facilities follow all proprietary operation and maintenance requirements.

During the development review process, project plans are reviewed for compliance with the City's General Plan, zoning ordinances, and other applicable local ordinances and codes, including stormwater requirements. Plans and specifications are reviewed to ensure that the appropriate BMPs are incorporated to address stormwater pollution prevention goals.

(h) Flood Hazard Management Ordinance

Effective April 19, 2021, Ordinance 186,952 amends the Specific Plan for the Management of Flood Hazards, established by Ordinance No. 154,405 and amended by Ordinance Nos. 163,913 and 172,081, to update it to meet current federal standards and to rename it the Flood Hazard Management Ordinance. The ordinance applies to all public and private development and provides for the establishment, management, and regulatory control of Flood Hazard areas. For properties within areas of Special Flood Hazard Areas as identified by FEMA in the FIS for the Los Angeles County dated December 2, 1980, the ordinance establishes certain policies that include development and construction standards and regulations that may require additional permitting and discretionary review. Being hazard-specific, the provisions of the ordinance deal with the unique problems of each hazard in addition to the Citywide policies and goals.

[22] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for LID, Part B: Planning Activities, 5th Edition, May 2016.*

[23] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for LID, Part B: Planning Activities, 5th Edition, May 2016.*

b. Existing Conditions

(1) Surface Water Quality

(a) Regional

The Project Site is located within the Los Angeles River Watershed and specifically in the Downtown Los Angeles sub-watershed. This sub-watershed drains directly into Reach 2 of the Los Angeles River. Los Angeles River Reach 2 primarily includes the Downtown Los Angeles area and the cities of South Gate, Lynwood, and Huntington Park. The Los Angeles River consists of a concrete channel, with the water generally restricted to a central low-flow channel.

Based on the Basin Plan, the beneficial uses of Los Angeles River Reach 2 are municipal and domestic water supply, industrial process water supply, ground water recharge, warm freshwater habitat, wildlife habitat, wetland habitat, water contact recreation, and non-contact water recreation.

According to the SWRCB, Los Angeles River Reach 2 is listed as an impaired water body. Impairments for Los Angeles River Reach 2 include: Ammonia, Coliform Bacteria, Copper, Lead, Nutrients (Algae), Oil, and Trash. As such, pursuant to Section 303(d) of the federal CWA, TMDLs for the Los Angeles River Reach 2 and its tributaries have been established for the following pollutants: trash, heavy metals, nutrients and ammonia.

(b) Local

Within the urban environment of the Project, stormwater runoff occurs during and shortly after rain events. The volume of runoff depends on the intensity and duration of the storm event and the imperviousness of the drainage area. Typical urban pollutants associated with stormwater runoff following rain events include sediment, trash, bacteria, metals, nutrients, and potentially organics and pesticides. The source of contaminants is wide ranging and includes all areas where rainfall occurs along with atmospheric deposition. Therefore, sources of contaminants within urban areas include roadways, building tops, parking lots, landscaped areas, and maintenance areas.

To reduce contaminant loads from entering the storm drain system, the City conducts routine street cleaning operations, as well as periodic cleaning and maintenance of the catch basins, to reduce stormwater pollution within the storm drain system. The City also installs catch basin screens to reduce the amount of debris entering the catch basins.[24]

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[24] *Fuscoe Engineering, Inc., Water Resources Technical Report, Buena Vista Project, 1251 North Spring Street & 1030-1380 North Broadway, Los Angeles, CA, May 15, 2025.*

(c) On-Site

Under existing conditions, the Project Site is partially developed, with portions of the Project Site currently used for transportation operations and maintenance-related facilities, bus parking and construction staging. Based on visual inspection by Fuscoe Engineering, water quality treatment control BMPs (techniques and structures designed to remove pollutants from stormwater runoff after it has already been collected, but before it enters a water body) are not currently present at the Project Site. Stormwater that leaves the Project Site is untreated and flows into grate inlets on the south into the public right-of-way, where it ultimately connects to the public storm drain system. Based on existing operations within the Project Site, the anticipated pollutants associated with on-site runoff include total suspended solids (TSS), oil/grease, heavy metals, nutrients, pesticides, and trash.

(2) Surface Water Hydrology

(a) Regional

As previously noted, the Project Site is located within the Los Angeles River Watershed, and falls within the Downtown Los Angeles sub-watershed. The Los Angeles River Watershed encompasses a land area of approximately 834 square miles. The watershed includes the western portion of the San Gabriel Mountains, the Santa Susana Mountains, the Verdugo Hills, and the northern slope of the Santa Monica Mountains. The Los Angeles River flows from the western San Fernando Valley, crosses the San Fernando Valley and the central portion of the Los Angeles Basin, and outlets in San Pedro Bay near Long Beach. The watershed's terrain consists of mountains, foothills, valleys, and the coastal plain.[25]

Major tributaries or sub-watersheds of the Los Angeles River include the Burbank Western Channel, Pacoima Wash, Tujunga Wash, and Verdugo Wash in the San Fernando Valley; and the Arroyo Seco, Rio Hondo, and Compton Creek in the Los Angeles Basin.

(b) Local

As described in the Water Resources Technical Report, stormwater runoff is collected from the Project Site and conveyed through off-site storm drain facilities along North Broadway and North Spring Street. The storm drain facilities adjacent to the North Parcel along North Broadway, also known as the Solano Drain, are owned and maintained by County Flood Control. The Solano Drain flows south and turns east and discharges into the Los Angeles River Channel.

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[25] *Los Angeles River Watershed, Los Angeles County Department of Public Works, https://dpw.lacounty.gov/wmd/watershed/la/, accessed April 29, 2025.*

The storm drain facilities adjacent to the South Parcel along North Broadway, which are owned and maintained by the City, flow in a southwesterly direction. The storm drain main line along North Broadway connects to a 42-inch main line flowing in an easterly direction adjacent to the Project's southern boundary toward North Spring Street. Additionally, stormwater runoff from the southerly portion of the Project Site adjacent to the Metro A Line tracks flows into a series of catch basins which also connect into the 42-inch main. This 42-inch storm drain line, which is also owned and maintained by the City, then connects to a County Flood Control owned and maintained storm drain line adjacent to North Spring Street. This County Flood Control main line, also known as BI 9910—Line A, ultimately discharges into the Los Angeles River Channel.

All of the stormwater runoff from the Project Site, which is within the Downtown Los Angeles sub-watershed, is discharged into the Los Angeles River (Reach 2: Downtown Los Angeles) and ultimately into the Pacific Ocean.

(c) On-Site

The Project Site is approximately 8.08 acres and is partially developed, with portions of the Project Site currently used for transportation operations and maintenance-related facilities, bus parking and construction staging.[26] Stormwater runoff is collected and conveyed at the two public street adjacencies that surround the Project Site.

The northern portion of the North Parcel sheet flows northerly toward the public street gutter of North Broadway, and then flows in a southwesterly direction into existing catch basins located along North Broadway. This runoff is partially conveyed by two catch basins connected to the Solano Drain located that are located at the intersections of North Broadway and Solano Avenue and North Broadway and Casanova Street. The rest of the runoff from the northern portion of the North Parcel is conveyed by one catch basin located adjacent to the intersection of North Broadway and Bishops Road, which is connected to the City storm drain adjacent to the South Parcel along North Broadway.

The southern portion of the North Parcel and the entire South Parcel sheet flow southerly toward the Metro A Line tracks into a series of existing catch basins located along the access road between the Project Site and the tracks. The catch basins then flow southwesterly into the City-owned 42-inch storm drain line that runs parallel to the southern boundary of the Project.

According to the Water Resources Technical Report, the Project Site is currently approximately 36 percent impervious. Table IV.H-1 on page IV.H-21 shows the existing

[26] *The Project involves the dedication of a three-foot-wide strip along North Broadway to the City resulting in a net acreage of 7.87 acres.*

Table IV.H-1
Existing Site Drainage Stormwater Runoff Calculations Summary

Drainage Area	Area (acres)[a]	Q_{25}[a] (cfs)	Q_{50}[b] (cfs)
A-1	3.48	7.11	8.59
A-2	0.84	1.61	1.95
A-3	2.70	4.55	5.47
B-1	0.85	1.43	1.72
C-1[c]	0.21	0.26	0.32
Site Total	**8.08**	**14.96**	**18.05**

cfs = volumetric flow rate measured in cubic feet per second

[a] *Q_{25} is the volumetric flow rate generated by a 25-year storm event.*

[b] *Q_{50} is the volumetric flow rate generated by a 50-year storm event.*

[c] *The Project involves the dedication of a three-foot-wide strip along North Broadway to the City, resulting a Project Site with a net acreage of 7.87 acres (342,678 square feet).*

Source: Fuscoe Engineering, Inc., 2025.

volumetric flow rate (measured in cubic feet per second [cfs]) generated by the 25-year and 50-year frequency storm event peak flow rate within the existing Project Site. The existing runoff rate during a 25-year storm event is 14.96 cfs and the existing runoff rate during a 50-year storm event is approximately 18.05 cfs. In all instances, runoff from the Project Site is being picked up in a series of catch basins located along North Broadway and the Metro access road. There are no known storm drain deficiencies associated with the Project Site.

(3) Groundwater Quality

(a) Regional

The City overlies the Los Angeles Coastal Plain Groundwater Basin, which consists of four major subbasins: Hollywood, Santa Monica, Central, and West Coast. This basin falls under the jurisdiction of the LARWQCB. According to LARWQCB's Basin Plan, water quality objectives applying to all ground waters of the region include those concerning bacteria, chemical constituents and radioactivity, mineral quality, nitrogen (nitrate and nitrite), taste, and odor.[27]

[27] *Los Angeles Basin Plan, September, 2014, accessed at www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html, January 27, 2025.*

(b) Local

As discussed above, the Project Site is located within the Central Basin, which underlies the southeastern part of the Los Angeles Coastal Plain Groundwater Basin. The Central Basin is bounded on the north by a surface divide called the La Brea high, and on the northeast and east by emergent less permeable Tertiary rocks of the Elysian, Repetto, Merced, and Puente Hills. The southeast boundary between Central Basin and Orange County Groundwater Basin roughly follows Coyote Creek, which is a regional drainage province boundary. The southwest boundary is formed by the Newport Inglewood fault system and the associated folded rocks of the Newport Inglewood uplift. The Los Angeles and San Gabriel Rivers drain inland and pass across the surface of the Central Basin on their way to the Pacific Ocean. The Central Basin production water bearing sediments are contained with Holocene alluvium and the Pleistocene Lakewood and San Pedro Formations. The same groundwater quality objectives apply to the local condition as the regional condition.

(c) On-Site

As discussed in Section IV.G, Hazards and Hazardous Materials and in the Hazardous Materials Report included as Appendix F of this Draft EIR, a gas station was previously located at the North Parcel and was demolished in 1989 and the associated USTs were removed in 1990. Subsequent subsurface investigations and remedial activities occurred, including installation and sampling of groundwater monitoring wells and vapor extraction wells at the site. Investigations and remedial activities have been conducted at the Project Site and adjoining properties (Former Cornfield site) to the southeast that indicate soil and groundwater have been impacted by total petroleum hydrocarbons as gasoline (TPH-g); BTEX; and methyl tert-butyl ether (MTBE) beneath limited portions of the off-site portion of the Former Cornfield site and attributed to the former gas station at the Project Site. Hydrocarbon-impacted soil was encountered during construction activities on the adjacent MTA easement resulting in the removal of 300 cubic yards of impacted soil in 2001. Two soil vapor extraction systems have been operated to remove gasoline and VOCs. In 2006, the LARWQCB issued a No Further Requirement for Soils Only (NFA) letter for the former gas station, as part of the larger Former Cornfield site. In addition, based on groundwater contamination sampling results, a request for closure for the site was submitted, which indicated that data in monitoring well MW-2 within the South Parcel were non-detect or close to laboratory reporting limits (RLs) for volatile and extractable fuel hydrocarbons and at monitoring well MW-18 within the South Parcel, VOCs and volatile and extractable fuel hydrocarbons were below laboratory reporting limits. The RWQCB has not responded to the request for closure, and the case remains open. As such, the former gas station is considered a recognized environmental condition. Refer to Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, for further discussion and analysis of this environmental issue.

(4) Groundwater Hydrology

(a) Regional

As discussed above, the City overlies the Los Angeles Coastal Plain Groundwater Basin. Replenishment of the Basin occurs primarily through percolation of rainfall throughout the watershed via permeable surfaces, spreading grounds, and groundwater migration from adjacent basins. Injection wells are also used to pump freshwater along specific seawater barriers to prevent the intrusion of salt water. Groundwater within the Basin generally flows in a south and southwesterly direction.

(b) Local

According to the California Department of Water Resources, the annual precipitation throughout the Central Basin ranges from 11 to 13 inches with an average of around 12 inches. The Central Basin has a surface area of 177,000 acres and a groundwater storage capacity of approximately 13,800,000 acre-feet. Historically, groundwater flow is generated from recharge areas in the northeast segment of the Central Basin, toward the Pacific Ocean on the southwest. Recharge of the Central Basin occurs primarily by engineered recharge of stormwater, imported water, and reclaimed water along the upper reaches of the San Gabriel and Santa Ana Rivers and the Rio Hondo. Additional sources of recharge include surface and subsurface flow and by direct percolation of precipitation and stream flow.

(c) On-Site

As discussed in the Geotechnical Investigation[28] included in Appendix E.1 of this Draft EIR, the Seismic Hazard Report for the Los Angeles 7.5 Minute Quadrangle (California Division of Mines and Geology, 2006) indicates that the historic high groundwater level in the area is approximately 20 feet below grade. For purposes of design the historic high groundwater level can be assumed to be 20 feet below the lowest site elevation of 292 feet above mean sea level (AMSL), which would be approximately 272 feet AMSL. During exploration of the Project Site, groundwater was encountered at depths ranging between 23 and 31 feet, which correlate with elevations between 263 and 270.5 feet AMSL.

As stated previously, the existing Project Site is approximately 36 percent impervious. There are no active groundwater production wells or public water supply wells within the Project Site or within one mile of the Project Site.

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[28] *Geotechnologies, Inc., Geotechnical Engineering Evaluation, Buena Vista Project, 1251 North Spring Street and 1030-1380 North Broadway, Los Angeles, California, January 23, 2025. See Appendix E.1 of this Draft EIR.*

(5) Flood Zone

According to the FEMA FIRM No. 06037C1628F, dated September 26, 2008, the Project Site is located within Zone X, which depicts areas determined to be outside the 0.2% (500-year) annual chance floodplain.

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to hydrology and water quality if it would:

Threshold (a): Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;

Threshold (b): Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

Threshold (c): Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- ***(i) result in substantial erosion or siltation on- or off-site;***
- ***(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;***
- ***(iii) 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; or***
- ***(iv) impede or redirect flood flows?***

Threshold (d): In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Threshold (e): Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Threshold (f): Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power,

natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. [29]

For this analysis, the Appendix G thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's *2006 L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G threshold questions.

The *L.A. City CEQA Thresholds Guide* identifies the following factors to evaluate hydrology and water quality impacts:

(1) Surface Water Hydrology

- Would the project cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources?
- Would the project substantially reduce or increase the amount of surface water in a water body?
- Would the project result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow?

(2) Surface Water Quality

- Would the project result in discharges that would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

As defined in the California Water Code:[30]

- "Pollution" means an alteration of the quality of the waters of the state to a degree which unreasonably affects either of the following: (1) the waters for beneficial

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[29] *In the CEQA Guidelines, this threshold appears under Section XIX, Utilities and Service Systems as Threshold (a). However, stormwater infrastructure is addressed in this section of the Draft EIR. As the threshold relates to water, wastewater, and energy and telecommunications infrastructure, it is addressed in each of the following sections of the EIR, respective: Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, Section IV.O.2, Utilities and Service Systems—Wastewater, and Section IV.O.4, Utilities and Service Systems—Energy Infrastructure.*

[30] *California Water Code Section 13050 Definitions, 1996.*

uses; or (2) facilities which serve these beneficial uses. Pollution may include contamination.

- "Contamination" means an impairment of the quality of the waters of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases. Contamination includes any equivalent effect resulting from the disposal of waste whether or not waters of the state are affected.

- "Nuisance" means anything which meets all of the following requirements: (1) is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property so as to interfere with the comfortable enjoyment of life or property; (2) affects at the same time an entire community or neighborhood, or any considerable number of persons although the extent of the annoyance or damage inflicted upon individuals may be unequal; and (3) occurs during or as a result of the treatment or disposal of wastes.

(3) Groundwater Quality and Hydrology

- Change potable water levels sufficiently to:
  - Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/ winter peaking, or to respond to emergencies and drought;
  - Reduce yields of adjacent wells or well fields (public or private); or
  - Adversely change the rate or direction of flow of groundwater;
- Result in demonstrable and sustained reduction of groundwater recharge capacity;
- Affect the rate or change direction of movement of existing contaminants;
- Expand the area affected by contaminants;
- Result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion); or
- Cause regulatory water quality standards at an existing production well to be violated, as defined in the CCR, Title 22, Division 4, Chapter 15 and in the Safe Drinking Water Act.

b. Methodology

The analysis is based on the Water Resources Technical Report prepared by Fuscoe Engineering, Inc. dated May 2025. This report is included as Appendix G of this Draft EIR.

(1) Surface Water Quality

The analysis of surface water quality impacts identifies the types of pollutants associated with construction and operation of the Project and considers their potential effects on surface water quality.

Project consistency with relevant regulatory permits/requirements, including BMPs and applicable plans, is evaluated to demonstrate how compliance would reduce potential Project impacts. Under Section 3.1.3 of the City's LID Manual, post-construction stormwater runoff from a new development must be infiltrated, captured and used, and/or treated through high efficiency on-site biofiltration/bioretention systems for at least the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event. In accordance with these requirements, the feasibility of the different potential BMPs outlined in the LID Manual is evaluated in the analysis, and the required capacity of the identified preferred feasible BMP is calculated.

The LID Manual states that BMPs shall be designed to manage and capture stormwater runoff. Infiltration systems are the first priority type of BMP improvements as they provide for percolation and infiltration of the stormwater into the ground, which not only reduces the volume of stormwater runoff entering the MS4 but also contributes to groundwater recharge in some areas. The second priority BMP is capturing and reusing stormwater onsite for either landscape irrigation or toilet flushing. Projects that cannot infiltrate or harvest/reuse the water quality volume may implement biofiltration BMPs. Biofiltration BMPs shall be sized to adequately capture 1.5 times the volume not managed through infiltration and/or capture and reuse.

Ultimately, one or multiple stormwater management strategies would be incorporated into LADBS' building permit review and approval process. Through this existing regulatory process, stormwater management strategies would be implemented to conform to the City of Los Angeles Sanitation Department's (LASAN) regulatory guidelines.

(2) Surface Water Hydrology

The surface water hydrology analysis evaluates the change in surface water runoff patterns and quantity for the Project Site due to the construction and operation of the Project, and the impact of these changes on the existing downstream stormwater system. As discussed in the Regulatory Framework Section above, the City has adopted the Los Angeles County Department of Public Works Hydrology Manual as its basis of design for storm drainage facilities. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The City's *L.A. City CEQA Thresholds Guide* establishes the 50-year frequency design storm event as the

threshold to evaluate potential impacts on surface water hydrology. Thus, to determine the ability of the existing storm drain infrastructure to accommodate any changes in runoff flows associated with the Project, potential flows from each drainage area during a 50-year frequency design storm event was evaluated.

As part of the surface water hydrologic analysis, stormwater runoff generated from the Project Site was quantified using the Modified Rational Method.[31] The Modified Rational Method assumes that a steady, uniform rainfall rate will produce maximum runoff when all parts of the basin area are contributing to outflow. This occurs when the storm event lasts longer than the time of concentration. The time of concentration (Tc) is the time it takes for rain in the most hydrologically remote part of the basin area to reach the outlet.

As part of its Hydrology Manual, the Los Angeles County Department of Public Works developed a time of concentration calculator, HydroCalc, to automate time of concentration, peak runoff rate, and total volume calculations. HydroCalc was used to calculate the stormwater peak runoff flow rate for the Project Site with implementation of the Project by evaluating the changes within the individual drainage areas.

(3) Groundwater Quality and Hydrology

The analysis of the Project's potential impacts associated with groundwater was based on a review of existing groundwater conditions and groundwater uses, and an evaluation of the potential impacts for construction and operation of the Project to affect those uses and groundwater quality. Construction and operational activities evaluated include any potential dewatering activities during construction; changes in groundwater recharge based on proposed land use changes; infiltration capacity of the underlying soil; potential soil or shallow groundwater exposure to construction materials, wastes, or spilled materials; handling and storage of hazardous materials; and any potential groundwater remediation activities.

The analysis of the Project's impacts on groundwater conditions included a review of the following proposed considerations:

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[31] *The equation used in the Modified Rational Method is Q=C x I x A, where "Q" equals the volumetric flow rate (cfs), "C" equals the runoff coefficient, "I" equals the rainfall intensity (inches per hour [inch/hr]), and "A" equals the tributary drainage area (acres). The Modified Rational Method assumes that the runoff coefficient (C) remains constant during a storm. The runoff coefficient is a function of both the soil characteristics and the percentage of impervious surfaces in the drainage area. The rainfall intensity was determined using isohyets rainfall values according to the Los Angeles County Department of Public Works Hydrology Manual. The tributary drainage area was determined by delineating high points to create drainage boundaries and any subareas.*

- Description of the rate, duration, location and quantity of extraction, dewatering, spreading, injection or other activities;
- The projected reduction in groundwater resources and any existing wells in the vicinity (typically within one-mile radius); and
- The projected change in local or regional groundwater flow patterns.

c. Project Design Features

No specific Project Design Features are proposed with regard to hydrology and water quality beyond applicable regulatory requirements, including improvements designed to meet LID requirements.

d. Analysis of Project Impacts

Threshold (a): Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

(1) Impact Analysis

(a) Surface Water Quality

(i) Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, because Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would prepare and implement a Project Site-specific SWPPP adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would specify BMPs to be used during construction to manage stormwater and non-stormwater discharges. BMPs would include, but would not be limited to, the following: erosion control, sediment control, tracking control, non-storm water management, materials and waste management, and good housekeeping practices.

With the implementation of the SWPPP and Project Site-specific BMPs, the Project would reduce or eliminate the discharge of potential pollutants into stormwater runoff. In

addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), which require the preparation and implementation of necessary measures, plans (including a wet weather erosion control plan if construction on the Project Site occurs during the rainy season), and inspections to reduce sedimentation and erosion.

Project excavation would extend to a maximum depth of up to 51 feet with a corresponding elevation of approximately 277 feet. As discussed above in Section 2.b.(4)(c), the historical high groundwater level in the area is approximately 20 feet below grade. For purposes of design, the historic high groundwater level was assumed to be 20 feet below the lowest site elevation with a corresponding elevation of approximately 272 feet. Since the lowest portion of the structures would be above an elevation of 272 feet, it is not expected that groundwater would be encountered during construction that would require temporary or permanent dewatering operations. In the event perched groundwater is encountered, dewatering would be required and the Project would be required to obtain a temporary dewatering permit from the City of Los Angeles. Dewatering operations are practices that remove and discharge non-stormwater from an earthwork location into a drainage system in order to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of NPDES requirements. As such, if dewatering is required during construction, temporary dewatering pumps and filtration would be used in compliance with all applicable NPDES requirements related to construction and discharges from dewatering operations, as well as the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.[32]

Overall, through compliance with NPDES requirements, site-specific BMPs included as part of the SWPPP, implementation of an erosion control plan as required by the LAMC, and all applicable City and County of Los Angeles regulations, construction of the Project would not result in discharges that would cause any of the applicable regulatory standards or waste discharge requirements to be violated in the Los Angeles River Watershed. Project construction activities also would not create substantial additional sources of polluted runoff, which could substantially degrade surface water quality. Thus, temporary construction-related impacts on surface water quality would be less than significant.

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[32] *Los Angeles Regional Water Quality Control Board, Coast Watersheds of Los Angeles and Ventura Counties, available at www.waterboards.ca.gov/rwqcb4/board_decisions/tentative_orders/general/npdes/cag994004/index.html, accessed September 24, 2024.*

(ii) Operation

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants that may be generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease.

As previously described, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 0.75-inch, 24-hour event and the 85th percentile 24-hour storm event. As discussed in the Water Resources Technical Report, infiltration BMPs have been deemed infeasible to satisfy water quality requirements at the Project Site due to poor soil conditions. Therefore, infiltration is determined to be infeasible for the Project Site, and the next tier in the LID Manual is a stormwater capture and use system. This would include cisterns that would be sized to hold the design capture volume. Continuous Deflection Separator (CDS) units would be installed to provide pretreatment of the LID flow rate, as well as adequate overflow piping for peak flows. The capture and use planter areas would be required to utilize the water quality volume within the 7-month wet season period. The footprints were determined based on the estimated water usage for the City of Los Angeles within the 7-month period, planting types and irrigation efficiency. Based on these factors, the Project would be required to provide a minimum 22,439 square feet of planting area to utilize the volume associated with the 85th percentile storm event at the Project Site. Once the water quality volume is met, the "higher flows" would enter overflow pipes within the CDS unit. These overflow pipes would then discharge excess stormwater to the local storm drain systems. The CDS units would treat the stormwater before it is stored for irrigation.

The existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. Implementation of the proposed BMP system would result in the treatment of the entire required volume for the Project Site and the elimination of pollutant runoff up to the 85th percentile storm event.

Based on the above, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements, nor would the Project create substantial additional sources of polluted runoff, which could substantially degrade surface water quality. Impacts to surface water quality during operation of the Project would be less than significant.

(b) Groundwater Quality

(i) Construction

As provided in Section II, Project Description, of this Draft EIR, approximately 237,364 cubic yards of soil would be exported from the Project Site throughout Project construction and the maximum depth of grading would be approximately 51 feet below grade.

As discussed above, there is not a high potential for groundwater to be encountered. However, if contaminated soils are found within the excavation limits, contaminated soils would be collected within the excavated material, removed from the Project Site, and disposed of in accordance with all applicable regulatory requirements. In particular, any contaminated soils found during excavation would be remediated at an approved disposal facility in accordance with applicable regulatory requirements. If conditions warrant dewatering due to perched groundwater, a temporary dewatering system consisting of pumps and filtration would be installed and operated in accordance with LARWQCB NPDES requirements. Any discharge of groundwater during Project construction would comply with the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements. As such, groundwater quality would not be negatively affected by potential dewatering activities.

As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes that may be used during construction could increase the potential for hazardous materials to be released into groundwater if these materials are released while the Project Site soils are exposed. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, including the applicable provisions of the CCR Title 22 which describes the protocol in the event of a hazardous waste discharge, transportation guidelines, standards for disposal facilities, contingency plans, emergency procedures, recordkeeping, and reporting, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area of groundwater contamination, or increase the level of contamination. In addition, while there are two groundwater monitoring wells, there are no existing groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells.

Oil wells may also affect groundwater quality. As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, there are known abandoned oil wells on the Project Site. Based on the Project's design, it is likely Project construction may trigger a recommendation to re-abandon from CalGEM, LAFD and LADBS, especially given that it would be necessary to cut the well casings down so that they would fit below the planned

subterranean parking structure(s). Cutting down the casing of an abandoned oil well would require a permit, which may trigger a re-abandonment requirement. In the event re-abandonment is required, re-abandonment would be conducted in accordance with current CalGEM specifications, as set forth in PRC Division 3, Chapter 4.1, Article 3, Section 1723, Los Angeles County Building Code 110.4, LAMC 91.7109.2, and Los Angeles Fire Code 57.5706.3 and 57.105.7.1.3. With implementation of regulatory requirements, groundwater would not be impacted as a result of re-abandonment or closure of the wells.

Based on the above, through compliance with applicable regulatory requirements, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements or otherwise substantially degrade groundwater quality. Therefore, construction-related impacts on groundwater quality would be less than significant.

(ii) Operation

The Project does not include the installation or operation of permanent water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well, or a spreading ground facility.

As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, no USTs are currently operated at the Project Site and the Project would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, source control measures per the City's LID requirements, which include good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, would also reduce surface water quality impacts and would prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. Any on-site use of hazardous materials to be used in association with operation of the Project, such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping, as well as fuel storage associated with maintenance and/or emergency equipment, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations such that no hazardous materials would be exposed to or otherwise adversely impact groundwater quality. In addition, any aboveground storage tanks associated with the use of emergency generators would be operated and tested in accordance with regulatory requirements. Additionally, the Project does not involve drilling to or through a clean or contaminated aquifer.

The Project would comply with all applicable regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well

to be violated, as defined in CCR Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. **Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements or otherwise substantially degrade groundwater quality. The Project's potential impact on groundwater quality during operation would be less than significant.**

(2) Mitigation Measures

As discussed above, Project level impacts related to water quality would be less than significant and no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to water quality would be less than significant and no mitigation measures are required.

Threshold (b): Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

(1) Impact Analysis

(a) Construction

As described in Section II, Project Description, of this Draft EIR, Project excavation would extend to a maximum depth of approximately 51 feet with an approximate elevation of 277 feet. As discussed above in Section 2.b.(4)(c), the historic high groundwater level on the Project Site is approximately 20 feet below grade with an approximate elevation of 272 feet. Since the lowest portion of the structures would be above an elevation of 277 feet, it is not expected that groundwater would be encountered during construction that would require temporary or permanent dewatering operations. In the event dewatering is necessary during construction due to perched groundwater, in accordance with LARWQCB requirements, the general contractor or designated subcontractor would obtain a discharge permit for groundwater extracted during dewatering operations and would implement any required treatment. Notifications and reporting related to the applicable discharge permit would be the responsibility of the general contractor. All dewatering methods would be designed and submitted to the local jurisdiction, which includes the LADBS Grading Division, LARWQCB, and/or LASAN for review and approval, and would be performed, inspected, and monitored in compliance with all applicable regulatory requirements. In addition, any water accumulated in excavations (e.g., from rainfall) would be managed in accordance with the SWPPP previously discussed.

Furthermore, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction.

Based on the above, construction activities for the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant.

(b) Operation

Under existing conditions, the Project Site is approximately 36 percent impervious. Upon completion of the Project, the Project Site would be approximately 75 percent impervious. In addition, there are no local or regional potable water wells in the vicinity of the Project Site. Thus, under the proposed conditions, regional and local potable water levels and adjacent wells or well fields would not be impacted by the Project. The Project does not include any groundwater pumping and would rely on the LADWP for water. In addition, the Project is not anticipated to adversely change the rate or direction of flow of groundwater. Since the Project's LID BMP design is for capture and use, treated runoff would be stored for irrigation and only excessive stormwater would be discharged into the storm drain system, away from the structures and groundwater table. **Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management. Impacts on groundwater supplies during operation of the Project would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to groundwater supplies and groundwater recharge would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to groundwater supplies and groundwater recharge were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (c): Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or thorough the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

iii. 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?

(1) Impact Analysis

(a) Construction

There are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project, including demolition, grading, and excavation, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could also be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, because the construction site would be greater than one acre, the Project would be required to obtain a NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs would be designed and selected to contain stormwater or construction watering on the Project Site such that runoff would not impact off-site drainage facilities or receiving waters. An Erosion Control Plan, prepared and implemented in accordance with City grading permit regulations (LAMC Chapter IX, Division 70), would address containing and treating stormwater or construction watering on-site to prevent runoff from resulting in substantial pollution or impacting off-site drainage facilities or receiving waters.

In addition, Project construction activities would occur in accordance with all applicable City grading and off-site permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Thus, through compliance with all applicable NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, Project construction activities would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. In addition, construction of the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As such, Project construction impacts related to erosion and flooding on- or off-site would be less than significant.

(b) Operation

As discussed above, the Project Site is currently comprised of approximately 36-percent impervious surfaces. With implementation of the Project, the Project Site would be comprised of approximately 75 percent impervious surfaces. As such, the Project would increase impervious surfaces on the Project Site, while simultaneously decreasing the slope of the flow. This decrease in the slopes of the Project surfaces would result in a slight reduction in stormwater runoff. In addition, as determined in the Water Resources Technical Report, and as summarized in Table IV.H-2 on page IV.H-38, the overall flow rate would decrease with implementation of the Project. Specifically, the existing runoff flow during a 25-year storm event and a 50-year storm event is 14.96 cubic feet per second and 18.05 cubic feet per second, respectively. As shown in Table IV.H-2, the Project's runoff flow would be 14.23 cubic feet per second during a 25-year storm event and 17.55 cubic feet per second during a 50-year storm event. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. Rather, a comparison of the pre- and post-peak flow rates indicates an overall decrease of 2.77 percent under the more conservative 50-year storm event. Therefore, the proposed on-site improvements would generate less runoff than the existing condition and would reduce the impact of the Project Site on the existing storm drainage system.

Moreover, in terms of polluted runoff, the Project's proposed uses would be typical of mixed-use operations and would not introduce substantial sources of pollution into the stormwater drainage system. As discussed above under Threshold (a), potential pollutants generated by the Project include sediment, nutrients, pesticides, pathogens, metals, trash, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff.

As discussed above, infiltration BMPs have been deemed infeasible to satisfy water quality requirements at the Project Site due to poor soil conditions. Therefore, the Project would include the implementation of capture and use BMPs. This would include cisterns that would be sized to hold the design capture volume. CDS units would be installed to provide pretreatment of the LID flow rate, as well as adequate overflow piping for peak flows set forth in Table IV.H-2.

The capture and use planter areas would be required to utilize the water quality volume within the 7-month wet season period. Based on planting types and irrigation efficiencies, it was determined that the Project would be required to provide a minimum of approximately 22,439 square feet of planting area to utilize the volume associated with the 85th percentile storm event at the Project Site. Once the water quality volume is met, the "higher flows" would enter overflow pipes within the CDS unit. These overflow pipes would then discharge excess stormwater to the local storm drain systems. The CDS units would treat the stormwater before it is stored for irrigation.

Table IV.H-2
Existing and Proposed Drainage Stormwater Runoff Calculations Summary

Condition	Area (acres)	Q_{25}[b] (cfs)	Q_{50}[b] (cfs)
Existing (Prior to Dedication)[a]	8.08	14.96	18.05
Proposed	7.87	14.23	17.55
Difference	0	0.73	0.50
Percent Increase or Decrease	-2.60%	-4.88%	-2.77%

cfs = volumetric flow rate measured in cubic feet per second

[a] *The Project involves the dedication of a three-foot-wide strip along North Broadway to the City, resulting in a Project Site with a net acreage of 7.87 acres (342,678 square feet).*

[b] *Q_{25} is the volumetric flow rate generated by a 25-year storm event.*

[c] *Q_{50} is the volumetric flow rate generated by a 50-year storm event.*

Source: Fuscoe Engineering, Inc., 2025.

As discussed above, the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. Implementation of the proposed BMP system would result in the treatment of the entire required volume for the Project Site and the elimination of pollutant runoff up to the 85th percentile storm event. **Based on the above, operation of the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. In addition, operation of the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As such, Project operational impacts related to erosion, flooding on- or off-site, stormwater drainage systems would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to erosion, flooding on- or off-site, and stormwater drainage systems would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to erosion, flooding on- and off-site, and stormwater drainage systems were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (c): Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

iv. impede or redirect flood flows?

As discussed above and in the Initial Study included as Appendix A to this Draft EIR, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. Thus, the Project would not impede or redirect flood flows. **As such, as determined in the Initial Study included as Appendix A to this Draft EIR, the Project would not alter the existing drainage pattern of the Project Site in a manner that would impede or redirect flood flows. Therefore, no impacts related to Threshold (c) iv would occur. No further analysis is required.**

Threshold (d): In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation?

As evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. Also, given the distance of the Project Site from the Pacific Ocean, the City of Los Angeles does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche.

In addition, as discussed in the Initial Study, the North Parcel of the Project Site is included within a Potential Inundation Area, as identified on the 1996 City's General Plan Safety Element Exhibit G, which relates to the potential for inundation due to water storage facility failures (e.g. dams and reservoirs). However, based on the updated maps provided in the City's 2024 City of Los Angeles Local Hazard Mitigation Plan, the Project Site is just outside of a Dam Failure Inundation Area.[33] Potential for dam failure is addressed through

[33] *City of Los Angeles, 2024 Local Hazard Mitigation Plan. Page 8-16.*

emergency action plans approved by the state and other regulations, which ensures dam safety. Thus, the likelihood of dam or reservoir failure is considered low.

As such, the Project would not be located in flood hazard, tsunami, or seiche zones, and the Project would not risk release of pollutants due to project inundation. Therefore, impacts related to Threshold (d) would be less than significant. No further analysis is required.

Threshold (e): Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

(1) Impact Analysis

Potential pollutants generated by the Project would be typical of residential and commercial uses and may include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants to minimize pollutant loads in stormwater runoff. As these structural and LID BMPs do not currently exist on-site, surface water and ground water quality would be improved relative to existing conditions. In addition, as discussed above, stormwater runoff would be reduced under the Project when compared with existing conditions, and the Project would not substantially reduce groundwater recharge capacity. **As such, based on the improved water quality conditions and reduction in runoff, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan, and impacts would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to a water quality control plan or a sustainable groundwater management plan would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to a water quality control plan or a sustainable groundwater management plan were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (f): Require or result in the relocation or construction of new or expanded storm water drainage facilities, the construction or relocation of which could cause significant environmental effects.

(1) Impact Analysis

In accordance with the City's LID requirements, the Project BMPs would control stormwater runoff, and the Project would not result in an increase in runoff, as shown in Table IV.H-2 on page IV.H-38. Specifically, the existing flow rate of approximately 17.73 cubic feet per second during a 50-year storm event would decrease with implementation of the Project to approximately 17.55 cubic feet per second. Therefore, stormwater flows from the Project Site would not increase due to the Project. **As such, the Project would not create or contribute additional runoff water that would exceed the capacity of the existing stormwater system and require or result in the relocation or construction of new or expanded stormwater drainage facilities. Therefore, potential impacts associated with new or expanded stormwater drainage facilities would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to stormwater drainage facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to stormwater drainage facilities were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated as early as 2034, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. The Mitigation Monitoring Program would provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, given that impacts related to hydrology and water quality are site-specific and do not typically vary over the course of relatively short timeframes, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

(a) Surface Water Quality

As detailed in Section III, Environmental Setting, of this Draft EIR, a total of 25 related development projects that have been identified in the vicinity of the Project Site.[34] These related projects reflect the diverse range of land uses in the vicinity of the Project Site. Specifically, the related projects comprise a variety of uses, including residential, restaurants, office, and retail uses, as well as mixed-use developments incorporating some or all of these elements. As discussed above, stormwater runoff from most urban development sites has the potential to introduce pollutants into the stormwater system. Given the similar types of land uses proposed by the related projects (as compared to heavy industrial, agricultural, or other such uses which may be expected to produce more pollution), anticipated and potential pollutants generated by the related projects could also include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. As with the Project, related projects would also be subject to NPDES requirements relating to water quality for both construction and operation. In particular, related projects would be required, pursuant to the City's LID Ordinance, to implement BMPs that would target potential pollutants that could be carried in stormwater runoff. **Therefore, through full compliance with all applicable local, state, and federal laws, rules and regulations, as well as implementation of site-specific recommendations for the related projects and Project, cumulative impacts associated with surface water quality would be less than significant.**

(b) Groundwater Quality

As noted above, the related projects comprise a variety of uses, including residential, restaurants, hotels, office, and retail uses, as well as mixed-use developments incorporating some or all of these elements. As with the Project, these related projects would be anticipated to involve the use, handling, storage, and disposal of similar potentially hazardous materials and wastes typical of such urban uses that could be released into the groundwater. However, as with the Project, the related projects would be required to comply with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, which would reduce the potential for the release of contaminants into groundwater. Other potential effects to groundwater quality, including from USTs and oil wells, are site-specific and would be addressed by each individual related project. Like the Project, related projects would also comply with applicable regulations during construction as discussed above for the Project and would implement site-specific

[34] *While Project buildout is anticipated in 2034, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. A later buildout date would not affect the cumulative impact analysis related to hydrology and water quality.*

measures where needed. **Therefore, through full compliance with all applicable local, state, and federal laws, rules and regulations, as well as implementation of site-specific recommendations for the related projects and Project, cumulative impacts associated with groundwater quality would be less than significant.**

(c) Surface Water Hydrology

The geographic context for the cumulative impact analysis on surface water hydrology is the Los Angeles River Watershed. In accordance with City requirements, the related projects would be required to implement BMPs to manage stormwater in accordance with the City's LID Ordinance. Furthermore, the City of Los Angeles Department of Public Works would review each related project on a case-by-case basis to ensure sufficient local and regional storm water drainage infrastructure is available to accommodate stormwater runoff. **Therefore, through full compliance with all applicable local, state, and federal laws, rules and regulations, as well as implementation of site-specific recommendations for the related projects and Project, cumulative impacts associated with surface water hydrology would be less than significant.**

(d) Groundwater Hydrology

Cumulative groundwater hydrology impacts could result from the overall utilization of groundwater basins located in proximity to the Project Site and other related projects in the vicinity of the Project Site. In addition, interruptions to existing hydrology flow by dewatering operations during construction would have the potential to temporarily affect groundwater levels. However, no water supply wells, spreading grounds, or injection wells are located within a one-mile radius of the Project Site. As with the Project, any related project would be required to evaluate its individual impacts to groundwater hydrology due to temporary or permanent dewatering operations. Similar to the Project, other proposed projects within the groundwater basin would be required to incorporate structural designs for subterranean levels that are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. If any related project requires permanent dewatering systems, such systems would be regulated by the SWRCB. Should excavation for other related projects extend beneath the groundwater level, temporary groundwater dewatering systems would be designed and implemented in accordance with NPDES permit requirements. Additionally, as with the Project, related projects would be required to implement BMPs to capture stormwater runoff on-site, thereby minimizing effects on groundwater recharge. **Therefore, through full compliance with all applicable local, state, and federal laws, rules and regulations, as well as implementation of site-specific recommendations for the related projects and Project, cumulative impacts associated with groundwater hydrology would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to hydrology and water quality would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to hydrology and water quality were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.