

2. Stormwater

Existing Conditions

The majority of the proposed Project site is currently developed with two existing eight-story structures and a plaza. The plaza is mostly hardscape and most of the remaining surfaces on the site are impermeable, except for a landscaped area that surrounds the buildings. Therefore, virtually all of the stormwater runoff from the site enters the area storm drains. The stormwater system serving the existing uses is a 12-inch line, which ties into the City's line in Avenue of the Stars.

Urban run-off within the City of Los Angeles is diverted to the appropriate storm drain pipe and the nearest catch basin. The collected stormwater flows through a network of pipes and open channels and is then released directly into the Pacific Ocean, specifically, Santa Monica and San Pedro Bays.

Stormwater discharges are regulated by the National Pollution Discharge Elimination System (NPDES). Stormwater permits are issued by the governing agency under the Federal Water Pollution Control Act, commonly referred to as the Clean Water Act. NPDES permits are issued for "non-point" discharge sources that transmit stormwater into various storm drain infrastructure such as gutters, catch basins, and pipes. As part of the permitting process, NPDES also requires the preparation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) prior to construction. The purpose of the SWPPP is to identify potential pollution sources and receptors associated with site development, and to prepare a plan to mitigate and control the pollutants during the pre-construction, construction, and post-construction stages of development.

An existing NPDES permit was issued to the subject property for the discharge of water from the subterranean drainage system into the City of Los Angeles storm drain system. Pursuant to the existing NPDES permit, discharge water is sampled and tested on a regular basis. It is anticipated that the existing permit and/or its requirements would remain in effect throughout the Project with the possibility of a temporary permit for the construction phase.

Threshold of Significance

Based upon criteria established in the City of Los Angeles Draft CEQA Thresholds Guide (1998), the proposed Project would result in a significant impact to stormwater resources if it:

- 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;
- Substantially reduce or increase the amount of surface water in a water body; or
- 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.

Construction Impacts

The Project would be designed to comply with all applicable construction and operational water quality standards and waste discharge requirements. The proposed Project would be required to file a stormwater plan with the City of Los Angeles for grading activities during the construction phase. As mentioned above, it is anticipated that the existing NPDES permit and/or its requirements would remain in effect throughout the Project with the possibility of a temporary permit for the construction phase.

There are two major sources of stormwater pollution that can occur during the construction phase of a project. The first source is materials found on the construction site that contain pollutants that can be transported through runoff. Pollutants can be found in the following construction-related materials including: adhesives, cleaning agents, landscaping materials, plumbing materials, paint,

heating/cooling machinery, masonry materials, floor and wall coverings, demolition debris, construction equipment vehicles and maintenance supplies. Proper handling and storage of such materials would effectively mitigate any potential impacts to a less than significant level.

The second major source of stormwater pollution during construction is sedimentation. Grading activities during the construction process can expose soils that are more susceptible to erosion. Best Management Practices (BMPs) from the stormwater plan should be designed to limit the amount of sediment entering the storm drain system, controlling runoff so that sediment is captured before the stormwater leaves the site and enters the storm drain system. The proposed Project could result in a potential impacts to the water quality of runoff from the site. However, implementation of the appropriate BMPs and compliance with the stormwater plan would reduce construction related stormwater pollution impacts to a less than significant level. BMPs for the proposed Project are listed as mitigation in this section.

Operational Impacts

The proposed Project site is currently covered with impermeable surfaces, including two eight story buildings, a subterranean parking garage and a hardscape plaza area. All stormwater on the Project site is conveyed to the storm drain system through the gutters of the buildings and drainage mechanisms located throughout the site. Since the majority of the site is currently covered with impermeable surfaces, development of the proposed Project will not result in additional quantities of runoff. The Project would include the conversion of part of the hardscape plaza into a lawn, which would provide additional permeable surface to reduce the amount of runoff. Implementation of BMPs that address drainage design considerations for the proposed Project would reduce flows by diverting runoff into landscaped areas, and away from paved surfaces. The use of permeable ground surfaces and grading landscaped areas to retain water would help minimize the amount of runoff.

The proposed Project will not generate stormwater run-off in excess of the existing conditions of the site, and not affect the amount of surface water in any of the surrounding water bodies. The majority of the run-off from the proposed Project will be from rooftop drainage, sidewalks, driveways and other impermeable surface drainage, which will flow through existing municipal storm drain facilities. The proposed Project design would be consistent with existing conveyance facilities and would not result in a permanent, adverse change to the movement of surface water sufficient to produce substantial change in the current or direction of water flow. Potentially significant impacts to water quality could result from the release of toxins into the stormwater drainage channels during the routine operation of commercial uses, including restaurants. However, the potential impacts would be mitigated to a less than significant level by incorporating stormwater pollution control measures. With conformance to a stormwater plan, an NPDES permit, and mitigation measures U-1 through U-15, the proposed Project would result in a less than significant impact with regard to stormwater runoff.

Mitigation Measures

Implementation of the following mitigation measures would reduce stormwater impacts to a less than significant level.

- U-1** The Project shall comply with NPDES requirements of the existing stormwater drain permit along with the preparation of a stormwater plan and other applicable filings prior to construction.
- U-2** During construction, drainage of the Project site shall be disposed of in a manner satisfactory to the City Engineer and the Regional Water Quality Control Board.
- U-3** The Project shall implement stormwater Best Management Practices (BMPs) to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period.

The design of structural BMPs shall be in accordance with the Development of Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

- U-4 Project connection to the sanitary sewer must have authorization from the Bureau of Sanitation.
- U-5 Cleaning of oily vents and equipment shall be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.
- U-6 Trash dumpsters must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and watertight dumpsters with lids. Containers shall be washed in an area with a properly connected sanitary sewer.
- U-7 Reduce and recycle waste, including oil and grease, to the extent feasible.
- U-8 Liquid storage tanks (drums and dumpsters) shall be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Drip pans or absorbent materials shall be used whenever grease containers are emptied.
- U-9 All storm drain inlets and catch basins within the Project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.
- U-10 The legibility of signs and stencils discouraging illegal dumping must be maintained.
- U-11 Materials with the potential to contaminate stormwater must be: 1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or 2) protected by secondary containment structures such as berms, dikes, or curbs.
- U-12 Storage areas must be paved and sufficiently impervious to contain leaks and spills.
- U-13 Storage areas must have a roof or awning to minimize collection of stormwater within the secondary containment area.
- U-14 The owner(s) of the property shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.
- U-15 Prescriptive methods detailing BMPs specific to the "Restaurant" category shall be incorporated to the extent feasible. Prescriptive methods can be obtained from the Department of City Planning's public counter or from the City's website at www.lastormwater.org.

Significant Project Impacts After Mitigation

The construction and operation of the Project could potentially result in a significant impact. Implementation of identified mitigation measures, BMPs, and compliance with NPDES regulations would reduce any Project-related impacts to stormwater drainage to a less than significant level.

Cumulative Impacts

Development of projects included in the related project list will not substantially contribute additional runoff to the existing storm drainage system. Currently, most of the properties are predominantly

covered with impermeable surfaces, conveying the majority of runoff into the storm drains. Therefore, the cumulative increase in runoff from these projects is minimal and is not anticipated to cause downstream flooding. In addition, the cumulative projects may be replacing older buildings that could be in violation of current NPDES standards, with new structures that would be required to comply with NPDES stormwater quality discharge requirements. Therefore, development of projects in the cumulative project list could result in reduced and less polluted runoff.

Due to the extent of impermeable surface area, the cumulative increase in runoff is minimal and not expected to affect the stormwater drainage system capacity. Therefore, cumulative impacts associated with stormwater drainage from the Project site, as well as those associated with related projects, are expected to be less than significant.