LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

# DRAFT
# ENVIRONMENTAL IMPACT REPORT

## 2800 Casitas Avenue Project

Environmental Case No.: ENV-2016-2862-EIR
State Clearinghouse No. 2017021051

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**Project Location:** 2750-2800 W. Casitas Avenue, Los Angeles, California 90039

**Community Plan Area:** Northeast Los Angeles

**Council District:** 1, Cedillo

**Project Description:** The 2800 Casitas Avenue Project ("proposed Project"), formerly referred to as the Bow Tie Yard Lofts Project, would involve the demolition of an existing 117,000-square-foot manufacturing/ warehouse/production building on the approximately 5.7-acre (248,190 square feet) Project Site. The Project would construct a new mixed-use development, consisting of five buildings with up to 419 multi-family residential units, up to 64,000 square feet of commercial space, and a multi-story parking structure. Commercial uses on-site would include a mix of restaurant uses, office space, and a rooftop urban farm/greenhouse. The Project's residential and commercial uses would comprise up to 487,872 square feet of total floor area. The proposed residential units would include a combination of 119 studios, 220 one-bedroom units, and 80 two-bedroom units in four buildings ranging from five to six stories with a maximum height of 85 feet above grade. Eleven percent of the base-density residential units (approximately 35 units) would be reserved as Very Low-Income Units. A seven-story (85-foot high) parking garage on the northwest end of the Project Site would provide 720 on-site parking spaces on levels one through six. The seventh level of the parking structure would include an urban farm/greenhouse. Open space areas and recreational amenities would include approximately 58,176 square feet.

**PREPARED FOR:**
The City of Los Angeles
Department of City Planning

**PREPARED BY:**
Parker Environmental Consultants

**APPLICANT:**
2800 Casitas, LLC

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**Technical Appendices**

Appendix A Notice of Preparation / Initial Study

A.1: Tree Report

Arborgate Consulting, Inc., Non-Protected Tree Report: 2800 Casitas, Los Angeles, June 20, 2016.

Appendix B NOP Comment Letters

Appendix C Air Quality Modeling Worksheets

Appendix D Geotechnical Investigation and Paleontological Records Search

D.1: City of Los Angeles, Department of Building and Safety, Soils Report Approval Letter, LOG # 94260-01, April 7, 2017.

D.2: LGC Geotechnical, Inc., Preliminary Geotechnical Report for Proposed Bow Tie Yard Lofts Project and Adjacent Parking Structure, Vesting Tentative Tract 74366, 2750 to 2800 West Casitas Avenue, Los Angeles, California, January 16, 2017.

D.3: Natural History Museum, Paleontological Resources for the Proposed Bow Tie Yard Lofts Project, in the City of Los Angeles, Los Angeles County, February 21, 2017.

Appendix E Greenhouse Gas Emissions Worksheets

Appendix F Environmental Site Assessment and Human Health Risk Assessment

Appendix F.1 Leighton and Associates, Inc., Phase I Environmental Site Assessment, 2750 and 2800 Casitas Avenue, Los Angeles California, Assessor Parcel Number 5442-002-012, May 31, 2016.

Appendix F.2 Human Health Risk Assessment

Enviro-Tox Services, Inc., Human Health Risk Assessment Report, 2750 and 2800 Casitas Avenue and 2800 Kerr Street, Los Angeles, California, January 28, 2016.

Appendix G Noise Monitoring Data and Calculation Worksheets

Appendix H Biological Technical Memorandum

Glenn Lukos Associates, Biological Technical Memorandum for the 2800 Casitas Avenue Project, an Approximately 5.7-Acre Property Located in Los Angeles County, June 13, 2017 [Revised January 22, 2019 and April 18, 2019].

Appendix I Public Service Letters

Appendix J Traffic Study

J.1 2800 Casitas Avenue VMT Analysis

City of Los Angeles Inter-Departmental Correspondence from LADOT to the Department of City Planning Re: Updated Transportation Impact Analysis For The Proposed Mixed-Use Development Located At 2800 Casitas Avenue (ENV-2016-2862-

EIR/CPC-2016-3054-GPA-VZC-CU-DB-CDO-SPR-MSC/VTT-74366) - DOT Case No. CEN 17-45791, December 17, 2019

The Mobility Group, 2800 Casitas Project – VMT Analysis, November 22, 2019

J.2 (Non-CEQA Traffic Study)

City of Los Angeles Inter-Departmental Correspondence from LADOT to the Department of City Planning Re: Transportation Impact Analysis for the Proposed Mixed-Use Development Located at 2800 Casitas Avenue [ENV-2016-2862-EIR /CPC-2016-3054-GPA-VZC-CU-DB-CDO-SPR-MSC/VTT-74366], DOT Case No. CEN 17-45791, August 16, 2017.

The Mobility Group, Bow Tie Lofts Project, Traffic Study, May 19, 2017.

Appendix K Tribal Cultural Resources Assessment

K.1 SWCA, Tribal Cultural Resources Assessment for the 2800 Casitas Lofts Project, City of Los Angeles, California, July 2019

Appendix L Cultural Resources Records Search

L.1 South Central Coast Information Center (SCCIC), California State University, Fullerton, Department of Anthropology, California Historical Resources Information System (CHRIS) Records Search Results for the Bow Tie Yard Lofts Project, October 5, 2016.

L.2 Natural History Museum of Los Angeles County, Paleontological Resources for the Proposed Bow Tie Yard Lofts Project, in the City of Los Angeles, Los Angeles County, February 21, 2017.

Appendix M Freeway Adjacent Health Risk Assessment

Pomeroy Environmental Services, Freeway Adjacent Health Risk Assessment, Bow Tie Lofts Project, May 2017.

Appendix N Project Alternatives, Traffic, Air Quality and Greenhouse Gas Modeling Worksheets

Appendix O Project Alternatives, Roadway Noise Calculations Worksheets

Appendix P Engineering Feasibility Report

KHR Engineering Associates, Engineering Feasibility Report, 2800 Casitas LLC, June 10, 2016.

Appendix Q Energy Demand Calculation Worksheets

Appendix R Parcel Profile Report and Zoning History

# I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (Draft EIR) contains a brief summary of the 2800 Casitas Avenue Project (proposed Project) and its potential environmental effects, along with a listing of the proposed Project design features and mitigation measures. More detailed information regarding the proposed Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included herein is a brief discussion of areas of controversy; a description of the public review process to date for the proposed Project; and a summary of the alternatives to the proposed Project evaluated in this Draft EIR.

## 1. Purpose of this Draft EIR

The purpose of this Draft EIR is to inform decision makers and the general public of the potential environmental impacts resulting from the proposed Project. The proposed Project will require approval of certain discretionary actions by the City of Los Angeles, and therefore, is subject to environmental review requirements under CEQA. For purposes of complying with CEQA, the City of Los Angeles Department of City Planning is identified as the Lead Agency for the proposed Project.

As described in Section 15121(a) and 15362 of the CEQA Guidelines, an EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to mitigate any significant environmental effects, and identify and evaluate a reasonable range of alternatives to the project that have the potential to mitigate or avoid the project's potential significant environmental effects while feasibly accomplishing most of the project's basic purposes. Therefore, the intent of this Draft EIR is to focus the discussion on the proposed Project's potential physical effects on the environment, which may be significant under the methodology and thresholds of significance identified in the CEQA Guidelines Section 15064. Where applicable, the Draft EIR recommends feasible mitigation measures that could potentially reduce or avoid significant environmental impacts.

This Draft EIR was prepared in accordance with Section 15151 of the CEQA Guidelines, which defines the standards for adequacy of an environmental impact report as follows:

*An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

# 2. Draft EIR Focus and Effects Found Not to Be Significant

## a) Notice of Preparation/Scoping Meeting

In compliance with Section 15082 of the CEQA Guidelines, a Notice of Preparation (NOP) was prepared by the Department of City Planning and distributed to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on February 16, 2017. The NOP and Notice of a Public Scoping Meeting was circulated for public review and comments for a 30-day period beginning on February 16, 2017 and ending on March 17, 2017. Appendix A to this Draft EIR contains a copy of the NOP and the CEQA Initial Study Environmental Checklist, respectively.

The public scoping meeting was held on March 1, 2017, to obtain the public's initial views about environmental issues that should be evaluated in the Draft EIR in connection with the Proposed Project. Agency and public response letters to the NOP and Initial Study Checklist are contained in Appendix B to this Draft EIR.

## b) Issues Analyzed in the Draft EIR

Based on a review of environmental issues covered in the Initial Study (IS), the public and agency comments on the IS/NOP, and the input received at the public scoping meeting held on March 1, 2017, this Draft EIR addresses the potential for significant impacts and analyzes the following environmental issues:

- Aesthetics
- Air Quality
- Geology and Soils
- Greenhouse Gas Emissions
- Hazardous Materials and Risk of Upset
- Land Use and Planning
- Noise

- Population and Housing
- Public Services / Recreation
- Public Utilities
- Traffic/Transportation
- Cultural Resources
- Biological Resources
- Tribal Cultural Resources; and
- Energy Conservation

The City determined through the Initial Study that the proposed Project would not have the potential to cause significant impacts related to some environmental issues. Therefore, the following environmental issues were scoped out in the proposed Project's Initial Study Environmental Checklist:

- Aesthetics – Scenic Vistas
- Aesthetics – Scenic Resources
- Agricultural and Forestry Resources
- Biological Resources – Movement of Fish and Wildlife
- Cultural Resources – Historic Resources
- Geology and Soils – Septic Tanks
- Hazards – Public and Private Airport Hazards
- Hazards - Wildfires
- Hydrology and Water Quality
- Land Use and Planning – Divide Established Community
- Mineral Resources
- Noise – Airport Noise
- Population – Resident and Housing Displacement
- Transportation – Air Traffic Patterns
- Utilities – Stormwater Drainage Facilities

# 3. Draft EIR Organization

The Draft EIR is organized into eight sections as follows:

**I. Executive Summary.** This section describes the purpose of the Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, areas of controversy and issues to be resolved, public review process, a summary of the proposed Project description, alternatives, environmental impacts, and mitigation measures.

**II. Project Description.** This section provides a complete description of the proposed action including the Project's location, existing Project Site uses and

environmental setting, Proposed Project features, a statement of Project objectives, and required discretionary actions presented.

**III. Environmental Setting.** This section provides an overview of the environmental setting of the proposed Project including a description of existing and surrounding land uses, and a list of related projects.

**IV. Environmental Impact Analysis.** This section is the primary focus of the Draft EIR. Each environmental issue addressed within this chapter (aesthetics, air quality, geology and soils, greenhouse gas emissions, hazard materials and risk of upset, land use and planning, noise, population and housing, public services, public utilities, traffic and transportation, cultural resources, biological resources, tribal cultural resources, and energy conservation) contains a discussion of the regulatory setting, existing baseline conditions, an analysis of the environmental impacts that are anticipated to occur as a result of the Proposed Project, mitigation measures capable of avoiding or reducing the projects significant environmental impacts, an analysis of cumulative impacts, and the level of impact significance after mitigation.

**V. Project Alternatives.** This section includes an analysis of a range of reasonable alternatives to the proposed Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the proposed Project and alternatives that would avoid or substantially lessen any of the significant effects of the proposed Project. The Alternative Analysis includes the following development scenarios:

1) No Project Alternative
2) Reduced Density Alternative
3) Commercial Office Alternative
4) Residential Alternative
5) Mixed-Use Podium Alternative

**VI. Other CEQA Considerations**. This section provides a summary of significant and unavoidable impacts of the Proposed Project, a discussion of potential growth inducing effects, an explanation of the significant irreversible environmental changes, and an reasons for possible effects found not to be significant.

**VII. Preparers and Persons Consulted.** This section presents a list of City, County, and other agencies and consultant team members that contributed to the preparation of the Draft EIR.

**VIII. References and Acronyms.** This section provides definitions for all of the acronyms and abbreviations used in this Draft EIR.

Additionally, the Draft EIR includes the following appendices as follows:

- Appendix A Notice of Preparation / Initial Study Checklist

  Appendices to the Initial Study
  A-A Tree Report

- Appendix B NOP Comment Letters
- Appendix C Air Quality Modeling Worksheets
- Appendix D Geotechnical Investigation
  - D.1 LADBS Soils Report Approval Letter
  - D.2 Preliminary Geotechnical Investigation
  - D.3 Paleontological Records Search
- Appendix E Greenhouse Gas Emissions Worksheets
- Appendix F Environmental Site Assessment
  - F.1 Phase I Environmental Site Assessment
  - F.2 Human Health Risk Assessment
- Appendix G Noise Monitoring Data and Calculations Worksheets
- Appendix H Biological Technical Memorandum
- Appendix I Public Service Letters
  - I.1 Los Angeles Police Department Response
  - I.2 Los Angeles Unified School District Response Letter
  - I.3 Los Angeles Department of Water and Will Serve Letter
  - I.4 Los Angeles Bureau of Sanitation Service Letter
  - I.5 Los Angeles Public Library Response Letter
  - I.6 Los Angeles Fire Department Response Letter

- Appendix J Traffic Study
    - J.1 2800 Casitas Avenue VMT Analysis
    - J.2 Non CEQA Traffic Study
- Appendix K Tribal Cultural Assessment
- Appendix L Cultural Resources Records Search
- Appendix M Freeway Adjacent Health Risk Assessment
- Appendix N Project Alternatives Air Quality and Greenhouse Gas Modeling Worksheets
- Appendix O Project Alternatives Roadway Noise Worksheets
- Appendix P Engineering Feasibility Report
- Appendix Q Energy Demand Calculation Worksheets
- Appendix R Parcel Profile Report and Zoning History

# 4. Thresholds of Significance

In 2006, the City published the *L.A. CEQA Thresholds Guide* (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening criteria, which provide directions in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project's impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning (DCP) has typically used both the screening criteria and significance thresholds as a basis for project analyses in its CEQA documents. However, the Thresholds Guide clearly indicates the Lead Agency – in this case, the DCP – retains the authority to determine significance thresholds on a case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. The Thresholds Guide also states it is not intended as substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, if states "because evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide.

In light of an evolving regulatory environment, recent case, law, new topics such as greenhouse gas emissions and tribal cultural resources that are now addressed in Appendix G of the State CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, the DCP has begun to update its CEQA guidance. At this point in time, the DCP has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate significance thresholds. Therefore, throughout this Draft EIR, the thresholds contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized where appropriate to assist in answering the Appendix G threshold questions.

In January 2018, OPR published comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems. The update also added energy and wildfire questions to Appendix G. The updated CEQA Guidelines became effective on December 28, 2018 and are reflected throughout this Draft EIR.

With respect to traffic/transportation impacts, recent changes have been implemented to Section 15064.3 of the State CEQA Guidelines, in which vehicle miles traveled (VMT) as the criteria by which to determine transportation impacts under CEQA, compared to the previous Level of Service (LOS) methodology. CEQA Guidelines Section 15064.3(c) state the provisions of Section 15064.3 shall apply statewide beginning on January 1, 2020 but that a lead agency may elect to be governed by its provisions immediately upon adoption. On July 30, 2019, the City adopted the VMT threshold and methodology. Therefore, in response to this action, the Traffic/Transportation EIR Section is based on the current Appendix G CEQA Thresholds and appropriately incorporates the VMT analysis for the proposed Project.

# 5. Existing Project Site Conditions

The Project Site is located at 2750-2800 West Casitas Avenue, Los Angeles, California 90039 (Project Site) and includes one parcel (Assessor Parcel Number 5442-002-012) that totals approximately 248,190 square feet of gross lot area (5.7 acres). The Project Site is located within the boundaries of the Northeast Los Angeles Community Plan Area (CPA) in the City of Los Angeles, approximately four miles north of downtown Los Angeles. The Project Site is directly accessible from Casitas Avenue, which terminates at the Project Site.

The Project Site is largely developed with a light manufacturing facility that is occupied by light manufacturing, warehouse, and film production uses (approximately 117,000 square feet) and a surface parking lot. Landscaping is located throughout the Project Site, specifically along the property perimeter and entrance and throughout the surface

parking lot. One ingress/egress driveway from Casitas Avenue is provided for access to the Project Site. The Project Site is currently secured with walls and fencing along the perimeter and a gated driveway.

The Project Site has a land use designation of Heavy Manufacturing and is currently zoned as [Q]PF-1-CDO-RIO. In 2010, the City inadvertently rezoned the Project Site from M2-1 to its current zoning, which is not consistent with the Project Site's land use designation under the Community Plan. The "PF" zoning is associated with a land use designation of Public Facilities, which allows for the development of agricultural uses, parking under freeways, fire and police stations, government buildings, public libraries, post offices, public health facilities, and public elementary and secondary schools.

# 6. Description of the Proposed Project

The proposed Project includes the demolition of the existing 117,000-square-foot warehouse/production building on the approximately 5.7-acre (248,190 square feet) Project Site, and the construction of a mixed-use development that would consist of five buildings with a maximum height of 85 feet. The proposed Project would provide up to 419 multi-family residential units and up to 64,000 square feet of commercial space. The commercial space would include a mix of restaurant uses, office space, and a rooftop urban farm. The Project's residential and commercial uses would comprise up to 487,872 square feet of total floor area. A seven-story parking garage (Building G), adjacent to Building A, would provide approximately 720 parking spaces for the Project's residential and commercial uses. The parking spaces would be provided in levels one through six, and an urban farm is proposed on the roof (seventh) level. Open space and recreational amenities would comprise approximately 58,176 square feet and would include a communal patio, pool deck, lounge seating, outdoor barbeque, amenity deck, and community room space.

More detailed descriptions of the proposed Project's architectural design, open space, landscaping, access/circulation, sustainability features, and construction schedule are provided in Section II, Project Description, of this Draft EIR.

# 7. Requested Permits and Approvals

Under CEQA, the public agency that has the principal responsibility for carrying out or approving a project is referred to as the Lead Agency (State CEQA Guidelines Section 15367). For purposes of the 2800 Casitas Avenue Project, formerly the Bow Tie Yard Lofts Project, the City of Los Angeles is the primary governmental agency responsible for approving the proposed Project. As such, the EIR must be certified and the proposed Project must be approved by the City of Los Angeles before the Project can

commence. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the proposed Project.

Approvals required for development of the Project may include, but not be limited to, the following:

1) Pursuant to LAMC Section 11.5.6, a **General Plan Amendment** to the Northeast Los Angeles Community Plan to change the land use designation from Heavy Manufacturing to Limited Industrial;

2) Pursuant to LAMC Section 12.32-Q, a Vesting **Zone Change and Height District Change** from [Q]PF-1-CDO-RIO to [Q]CM-1-CDO-RIO;

3) Pursuant to LAMC Section 16.05-C,1(b), **Site Plan Review** for the development of up to 419 residential units and up to 64,000 square feet of commercial uses;

4) Pursuant to California Government Code Section 65915(f)(3) and LAMC Section 12.22-A,25, a **Density Bonus Compliance Review** for the Project providing 11 percent of the total units (excluding density bonus units) as Very Low Income Units to permit a mixed-use development with the following development incentive and waiver:

   a. Density Bonus to allow a 35-percent increase in the permitted density to allow 419 units in lieu of the 310 units otherwise permitted in the CM zone;

   b. One on-menu incentive to allow a maximum 35-percent increase in Floor Area Ratio (FAR); and

   c. One off-menu waiver to use the lot area of the site as the buildable area for calculating floor area;

5) Pursuant to LAMC Section 13.08, **Design Overlay Plan Approval**;

6) Pursuant to LAMC Section 12.24-W,1, a **Conditional Use Permit (CUB)** to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption in conjunction with (a) a proposed restaurant with 1,435 square feet of interior space and 838 square feet of exterior space and 104 total seats, inclusive of outdoor seating; and (b) a proposed beer garden with 845 square feet of interior space and 1,951 square feet of exterior space and 105 total seats, inclusive of outdoor seating; and

7) Pursuant to LAMC Section 17.15, a **Vesting Tentative Tract Map** for the subdivision of one lot into one ground lot and 17 airspace lots.

Other approvals may be necessary, including demolition permits, haul route approval, grading, and associated building permits. On-site parking would be provided pursuant to LAMC Section 12.22-A,25(d)1.

Federal, state, and regional agencies that may have jurisdiction over some aspect of the project include, but are not limited to:

- California Regional Water Quality Control Board (RWQCB);
- California State Parks;
- Los Angeles Department of Water and Power (LADWP);
- Caltrans; and the
- South Coast Air Quality Management District (SCAQMD).

# 8. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. During the NOP comment period, public comments were received regarding general concerns regarding the proposed Project and environmental impacts to be addressed in the EIR. The predominant areas of concern raised during the NOP comment period include: increased construction and operational traffic impacts, biological impacts to the Los Angeles River, and aesthetic impacts and views in the area.

# 9. Environmental Review Process

The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for a period of 45 days. After completion of the 45 day review period, a Final EIR will be prepared that responds to comments on the Draft EIR submitted during the review period and modifies the Draft EIR as required. Public hearings on the proposed Project will be held after completion of the Final EIR. The City will make the Final EIR available to agencies and the public prior to considering certification of the Final EIR.

# 10. Summary of Environmental Impacts

Table I-1 on the following pages summarizes the various environmental impacts associated with the construction and operation of the Proposed Project. Mitigation measures are proposed for potentially significant environmental impacts, and the level of impact significance after mitigation is also identified.

**Table I-1**
**Summary of Project Impacts**

| Environmental Issue | Project Impacts |
|---|---|
| **A. AESTHETICS** | |
| Scenic Quality | Less Than Significant Impact |
| Light/Glare | Less Than Significant Impact |
| **B. AIR QUALITY** | |
| Consistency with Applicable Air Quality Plans | Less Than Significant Impact |
| Increase Criteria Pollutants Under Air Quality Standards | Less Than Significant Impact |
| Expose Sensitive Receptors to Localized Emissions | Less Than Significant Impact |
| Objectionable Odors | Less Than Significant Impact |
| **C. GEOLOGY AND SOILS** | |
| Surface Rupture | Less Than Significant Impact |
| Ground Shaking | Less Than Significant Impact |
| Liquefaction | Less Than Significant Impact |
| Landslides | Less Than Significant Impact |
| Soil Erosion or Loss of Topsoil | Less Than Significant Impact |
| Lateral Spreading, Subsidence, and Collapse | Less Than Significant Impact |
| Expansive Soils | Less Than Significant Impact |
| Paleontological Resources | Less Than Significant Impact |
| **D. GREENHOUSE GAS EMISSIONS** | |
| Indirect or Direct GHG Emissions | Less Than Significant Impact |
| Consistency with Plans, Policies, or Regulations | Less Than Significant Impact |
| **E. HAZARDOUS MATERIALS / RISKS OF UPSET** | |
| Routine Transport, Use, or Disposal | Less Than Significant Impact |
| Release of Hazardous Materials | Less Than Significant Impact |
| Hazardous Emissions Near School | Less Than Significant Impact |
| Listed on Government Database | Less Than Significant Impact |
| Interfere with Emergency Response or Evacuation Plan | Less Than Significant Impact |
| **F. LAND USE AND PLANNING** | |
| Consistency with Land Use Plans, Policies, and Regulations | Less Than Significant Impact |
| **G. NOISE** | |
| Construction Noise | |
| *On-site Construction Noise* | Less Than Significant Impact |
| *Off-site Construction* | Less Than Significant Impact |
| Operational Noise | |
| *Roadway Noise* | **Significant and Unavoidable** |
| *Outdoor Activity* | Less Than Significant Impact |
| *Mechanical Equipment and HVAC* | Less Than Significant Impact |
| *Parking Garage, Loading, and Trash Collection* | Less Than Significant Impact |
| *Composite Noise* | Less Than Significant Impact |
| Construction Vibration | |
| *Human Annoyance* | Less Than Significant Impact |
| *Building Damage* | Less Than Significant Impact |
| *Haul Trucks* | Less Than Significant Impact |
| Operational Vibration | |
| *Human Annoyance* | Less Than Significant Impact |
| *Building Damage* | Less Than Significant Impact |
| **H. POPULATION AND HOUSING** | |
| Population | Less Than Significant Impact |
| Housing | Less Than Significant Impact |

| | |
|---|---|
| **I. PUBLIC SERVICES** | |
| Fire Protection | Less Than Significant Impact |
| Police Protection | Less Than Significant Impact |
| Schools | Less Than Significant Impact |
| Parks / Recreation | Less Than Significant Impact |
| Libraries | Less Than Significant Impact |
| **J. PUBLIC UTILITIES AND SERVICE SYSTEMS** | |
| Water Supply and Infrastructure | Less Than Significant Impact |
| Wastewater Infrastructure and Capacity | Less Than Significant Impact |
| Solid Waste | Less Than Significant Impact |
| Electric Power, Natural Gas and Telecommunications Infrastructure | Less Than Significant Impact |
| **K. TRAFFIC AND TRANSPORTATION** | |
| Consistency with Program, Plans, Ordinance and Policy Addressing Circulation System | Less Than Significant Impact |
| Consistency with CEQA Guidelines Section 15064.3 subdivision (b) | **Significant and Unavoidable** |
| Geometric Design | Less Than Significant Impact |
| Emergency Access | Less Than Significant Impact |
| **L. CULTURAL RESOURCES** | |
| Archaeological Resources | Less Than Significant with Mitigation Incorporated |
| **M. BIOLOGICAL RESOURCES** | |
| Habitat Modifications | Less Than Significant Impact |
| Riparian Habitat and Sensitive Natural Communities | Less Than Significant Impact |
| Protected Wetlands | Less Than Significant Impact |
| Native Residents or Migratory Fish or Wildlife Species | Less Than Significant Impact |
| Consistency with Biological Resources Ordinances and Policies | Less Than Significant Impact |
| Consistency with Adopted Habitat Conservation Plans | Less Than Significant Impact |
| **N. TRIBAL CULTURAL RESOURCES** | |
| Tribal Cultural Resources | Less Than Significant Impact |
| **O. ENERGY CONSERVATION** | |
| Electricity Demand and Infrastructure | Less Than Significant Impact |
| Natural Gas Demand and Infrastructure | Less Than Significant Impact |
| Transportation Energy Demand and Resources | Less Than Significant Impact |
| Consistency with Applicable Plans and Policies | Less Than Significant Impact |
| *Source: Parker Environmental Consultants, 2019.* | |

# a) Less Than Significant Impacts

## (1) Aesthetics

### *(a) Scenic Quality*

#### *(i) Construction*

While construction would alter the visual character of the proposed Project area on a temporary basis, Project construction activities would not substantially alter or degrade the existing visual character and quality of the Project Site and its surroundings or introduce elements that generate substantial long-term contrast with or substantially

detract from visual character of the surrounding area for the following reasons: (1) views of Project construction activities would be limited in duration and location; (2) the appearance of the Project Site would be typical of construction sites in urban areas; and (3) construction would occur within an urban setting with a high level of human activity and development. As noted under Project Design Feature AES-PDF-1, the Applicant would install a temporary fencing around the perimeter of the Project Site for security purposes and to block views of the Project Site from the pedestrian level. Installation of temporary fencing and compliance with the applicable regulatory measures would further reduce visual impacts caused during the construction of the proposed Project. For example, temporary signs on temporary construction walls shall comply with the construction requirements of LAMC Section 14.4.16 E. Pursuant to LAMC Section 91.6205, the Applicant is also responsible for maintaining the visibility of the required signage and for maintaining a construction barrier free and clear of any unauthorized signs and graffiti. Compliance with these regulatory measures would reduce visual impacts during construction to a less-than-significant level.

*(ii) Operation*

The Project Site is located just north of the Los Angeles River. The proposed site plan provides for visual connections between residential, commercial, and public environment along the LA River corridor and proposed public park space to the south. Therefore, the proposed Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter. Additionally, the proposed Project would not conflict with the Conservation Element's objectives related to the protection of important cultural and historic sites, agricultural lands, equine areas, or forests, as no such resources would be impacted by the proposed Project. The proposed Project would complement the pedestrian movement with walkways, a bike path, and a plant palette that appropriately transitions to the Los Angeles River corridor and proposed State Park property to the south. As such, the proposed Project would not conflict with the applicable zone regulations governing height and massing, or applicable policies or objectives governing aesthetic or scenic qualities, and aesthetic impacts would be less than significant.

*(b) Light/Glare*

*(i) Light*

The proposed Project would introduce lighting to the Project Site area due primarily to building illumination emanating through the windows of the proposed ground floor commercial storefronts, residences, security and pedestrian safety lighting fixtures, and light from vehicles entering and exiting the parking garage. As provided in Project Design Feature AES-PDF-2, exterior lighting on-site would generally include low-level security lighting, residential lighting, architectural building lighting, landscape elements,

and Project signage. Commercial signage would comply with the City of Los Angeles Sign Provisions and with the CDO standards. The commercial office and urban farm uses on-site would generally operate during the day and would create minimal nighttime lighting. The commercial restaurant and beer garden uses located on the southern portion of the Project Site overlooking the Los Angeles River would operate into the evening hours, until 11:00 P.M., or as otherwise specified by the conditional use permit. Nevertheless, all exterior lighting on-site would comply with the exterior lighting standards applicable to development within the RIO District. Interior light emanating from the proposed residential uses and commercial uses would be a relatively low-level indirect source of light and would not adversely impact other properties in the immediate area or the Los Angeles River. Additionally, the proposed Project's lighting fixtures would be installed and operated in accordance with 99.05.106.8 (Light Pollution Reduction) of the City of Los Angeles Green Building Code (which requires outdoor lighting systems to be designed and installed to comply with the minimum requirements in the California Energy Code, or comply with a local ordinance, whichever is more stringent). Overall, the proposed Project would be expected to slightly increase ambient lighting in the area since the beer garden is anticipated to operate until the evening hours. The proposed Project would not surpass the lighting criteria specified in the LAMC for a significant impact to occur. Impacts related to nighttime lighting would, therefore, be less than significant.

*(ii) Glare*

The Project Site currently produces minimal glare, primarily associated with vehicles parked on the on-site surface parking lot. The proposed Project would introduce five buildings to the Project Site. The structures will be constructed with materials designed to reduce glare, as identified in Project Design Feature AES-PDF-3. The architectural materials of the proposed Project would include a variety of surface materials, including medium grain finish plaster (stucco), concrete fiber board panel siding, standing seam metal siding, aluminum storefront glazing, aluminum frame casement windows, aluminum frame sliding doors, aluminum storefront glazing, roll up sectional garage door, glass, painted steel guardrail, louvers, and design features, and cast-in-place concrete. Interior lighting from within the residential, commercial and greenhouse spaces would be visible from surrounding structures during evening hours but would not cast spillover light or glare onto adjacent properties. As part of Project Design Feature AES-PDF-3, the proposed Project's façades and windows will be constructed of non-reflective materials (e.g., minimize the use of glass with mirror coatings) such that glare impacts on surrounding properties and roadways are minimized. Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted. There would not negligible potential for

daytime or nighttime glare, and light and glare associated with the Project would not substantially alter the character of the Project area. Furthermore, the landscaped courtyards and green areas would serve to reduce the buildings' heat gain and reflective glare potential. The Project would result in a less-than-significant impact with respect to generating a source of glare within the Project Site area.

Based on the above, with compliance with all applicable City regulations and the implementation of Project Design Features, light and glare associated with Project construction and operation would not adversely impact the ambient nighttime levels in the immediate area or the Los Angeles River, and the Project would not create a new source of substantial light or glare that would adversely affect the Project area.

### (2) Air Quality

#### *(a) Consistency with the Applicable Air Quality Plans*

By meeting SCAQMD rules and regulations, Project construction activities would be consistent with the goals and objectives of the AQMP to improve air quality in the Basin. The proposed Project would generate construction an operational air quality emissions. However, the proposed Project's construction or operational air quality emissions would not exceed the SCAQMD thresholds of significance for the six criteria pollutants (ROC, $NO_x$, CO, $SO_2$, $PM_{10}$, and $PM_{2.5}$) at the Project level. As the proposed Project would not exceed any of the state and federal standards, the proposed Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. Thus, the proposed Project would not have the potential to increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations.

Additionally, the proposed Project is consistent with the population and housing projections of the 2016-2040 RTP/SCS for the Los Angeles subregion and would not jeopardize attainment of the air quality conditions projected in the AQMP. The proposed Project would provide a variety of land uses, including multi-family residential, office space, restaurant space, and an urban farm in close proximity to transit, which would help reduce vehicle miles traveled by promoting transit and internal capture trips. As such, the proposed Project would support the land use policies set forth in the AQMP.

Further, the proposed Project would be consistent with the policies of the General Plan Air Quality Element. In summary, the proposed Project would be consistent with applicable regional plans pertaining to air quality, including the City of Los Angeles Air Quality Element and the AQMP. The proposed Project does not require any air quality mitigation measures. Impacts associated with plan consistency would be less than significant.

*(b) Increase Criteria Pollutants Under Air Quality Standards*

The air quality analysis assumes a Project construction schedule of approximately 30 months, with final buildout occurring in 2023. Construction activities associated with the proposed Project would be undertaken in six main activities: (1) demolition; (2) site clearance/preparation; (3) grading/excavation; (4) building construction; (5) paving; and (6) architectural coatings/finishing.

As mentioned previously, the proposed Project would not result in regional construction or operational air quality emissions that exceed the SCAQMD thresholds of significance for the six criteria pollutants (ROC, $NO_x$, CO, $SO_2$, $PM_{10}$, and $PM_{2.5}$) at the Project level. Therefore, the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and regional air quality impacts associated with Project-related construction emissions would be less than significant.

*(c) Expose Sensitive Receptors to Localized Emissions*

The daily on-site construction emissions generated by the proposed Project are analyzed against the SCAQMD's localized significance thresholds to determine whether the emissions would cause or contribute to adverse localized air quality resulting in impacts to sensitive receptors. The area surrounding the Project Site is mostly populated with existing educational and residential sensitive receptors and one proposed park as a future sensitive receptor. On-site construction emissions generated by the proposed Project would not exceed the established SCAQMD localized significance thresholds. Localized operational emissions from natural gas, architectural coatings, and consumer products would increase the amount of localized air pollution on the Project Site. Operation of the proposed Project would replace the existing light industrial, warehousing, and production uses on-site with a mixed-use residential/commercial development project. The proposed Project's on-site operations emissions would not exceed the thresholds of significance for localized air quality emissions. Therefore, localized on-site construction and operational emissions would be less than significant.

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of CO. At buildout of the Project, the highest average daily volume at an intersection would be approximately 49,940 at the intersection of Fletcher Drive and Riverside Drive, which is significantly below the daily traffic volumes (400,000 vehicles per day) that would be expected to generate CO exceedances as evaluated in the 2003 AQMP. Based on a comparative assessment of the traffic volumes at each of the 12 study intersections,

improved ambient CO concentrations, and cleaner vehicle emissions, localized operational emissions would be less than significant.

The proposed Project consists of a mixed-use development containing multi-family residential units and commercial uses that would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic TACs. Because there is such a short-term exposure period (30 out of 840 months), construction TAC emissions would result in a less-than-significant impact. Therefore, impacts associated with the generation and/or release of TACs would be less than significant.

With respect to ZI. No. 2427 and the proposed Project's potential to expose future residents to freeway emissions, a Project-specific HRA was prepared to quantify the localized health risks associated with freeway emissions. The HRA concluded that carcinogenic and non-carcinogenic hazards were predicted to be within acceptable limits. As required by ZI. No. 2427 and the LAMC, the proposed Project will include air filtration systems with filters meeting or exceeding the ASHRAE 52.2 Minimum Efficiency Reporting Value (MERV) of 13 pursuant to LAMC Section 99.04.504.6 for new ventilated buildings within 1,000 feet of a freeway (Ordinance 184245). As such, the Project would be consistent with ZI No. 2427 and the LAMC, and impacts would be less than significant.

*(d) Objectionable Odors*

The proposed Project does not include any of the uses identified by the SCAQMD as being associated with odors, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding. In addition, SCAQMD BACT Guidelines would limit potential objectionable odor impacts during the proposed Project's long-term operations phase. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD rules, no construction activities or materials that would create a significant level of objectionable odors are proposed.

The proposed Project would not create objectionable odors affecting a substantial number of people during long-term operation. The proposed Project's residential uses would not generate a source of odors. Odors from garbage chutes and enclosed refuse containers would be controlled through standard best management practices and ongoing building maintenance procedures. While restaurant-related uses have the potential to generate odors from cooking and disposal of organic waste, restaurant operators would be subject to SCAQMD Rule 1138, which requires the installation of

odor-reducing equipment. Therefore, a less-than-significant impact would occur with respect to the creation of objectionable odors from proposed Project operations.

### (3) Geology and Soils

#### *(a) Surface Rupture*

The Project Site is not located within a seismic hazard zone for faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Aliqust-Priolo Act. The City of Los Angeles ZIMAS system shows that the closest fault to the Project Site is the Hollywood Fault located approximately ½-mile from the Project Site. As such, the potential for surface rupture at the Project Site is currently low. Further, the construction of the Project would not cause or exacerbate the potential for surface rupture, and impacts related to surface rupture would be less than significant.

#### *(b) Ground Shaking*

The Project Site is susceptible to ground motion and shaking as a result of potential movement along faults in the region. The proposed Project would be designed and constructed in conformance with the most recently adopted 2016 California Building Standards Code (CBSC) design parameters, which are specifically tailored to minimize the risk of structure failure due to seismic hazards. Conformance with the CBSC and the City of Los Angeles Uniform Building Code would ensure that impacts relating to ground shaking would be less than significant. Development of the proposed Project would not promote or intensify ground shaking on-site, and thus would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving ground shaking. Compliance with the recommendations of the proposed Project's Geotechnical Investigation as approved by the Department of Building and Safety would ensure that potential impacts associated with ground shaking are less than significant.

#### *(c) Liquefaction*

The Project Site is located within a State of California Seismic Hazard Zone for liquefaction potential. As analyzed in the Geotechnical Investigation (See Appendix D) liquefaction analysis was performed for the two 50-foot borings adjacent to the channel based on the seismic criteria of the 2016 CBC and historic high groundwater depth. Due to the dense to very dense nature of on-soils and the depth of groundwater levels, the Project Site is not considered susceptible to liquefaction, lateral spreading, and seismic related ground failure. As such, development of the proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure or liquefaction. Therefore, impacts related to ground failure and liquefaction would be less than significant.

*(d) Landslides*

The Project Site is not located within a hillside area, or within a landslide area. The Project Site is currently developed, and development of the proposed Project would not cause or exacerbate the potential for landslides to occur on- or off-site. As such, a less than significant impact would occur with respect to landslides.

*(e) Loss of Topsoil / Soil Erosion*

*(i) Construction*

Although development of the proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. The proposed Project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP), which would incorporate required implementation of Best Management Practices (BMPs) for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of regulatory measures would further ensure a less-than-significant impact would occur with respect to erosion or loss of topsoil during construction.

*(ii) Operation*

The Applicant would be required to meet the requirements of the Low Impact Development (LID) standards and further requirements contained in LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control. The LID requirements require the preparation of a LID Plan and implementation of Best Management Practices (BMPs) to retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85$^{th}$ percentile 24-hour runoff event, whichever is greater. Compliance with the regulatory measures would ensure that sedimentation, soil erosion, and loss of topsoil during the operation of the proposed Project would be less than significant and water quality standards would be maintained.

*(f) Lateral Spreading, Subsidence, and Collapse*

As analyzed in the Geotechnical Investigation (See Appendix D), on-site soils are not considered susceptible to liquefaction and lateral spreading. The development of the proposed Project would not cause or promote lateral spreading, subsidence, or collapse. As such, the proposed Project would not exacerbate any potential hazards associated with lateral spreading, subsidence, and collapse, and Project impacts related to such conditions would be less than significant.

*(g) Expansive Soils*

Two Expansion Index (EI) tests were performed for the Project Site. Results were EI values of 0 and 4, corresponding to "Very Low" expansion potential. The recommendations contained in the Geotechnical Investigation are intended as a reasonable protection against the potential damaging effects including expansive soils. Since the on-site soils have a "Very Low" expansion potential, reinforcing beyond the minimum required by the City of Los Angeles Department of Building and Safety is not required. Therefore, a less than significant impact would occur with respect to expansive soils.

*(h) Paleontological Resources*

The Natural History Museum's record search determined that there are no known paleontological resources on the Project Site. The proposed Project has been previously developed, previously disturbed surficial soil layers on the Project Site are not likely to contain substantive vertebrate fossils. Given the results of the Natural History Museum's records search, the construction of the proposed Project would not result in any significant impacts to a known or previously recorded paleontological resource. Construction of the proposed Project would entail demolition of the existing structures and excavation to a maximum depth of approximately 15 feet below grade. In the unlikely event that paleontological resources are encountered during the construction phase, the construction activities would be required to comply with regulatory compliance measures with regards to paleontological resources. Work in the area of the find shall be halted until a qualified paleontologist has evaluated the find and provided recommendations to comply with California Public Resources Code Section 21083.2 for the proper handling of paleontological resources. As such, compliance with existing regulations would ensure potential impacts upon paleontological resources are less than significant.

## (4) Greenhouse Gas Emissions

*(a) Indirect or Direct GHG Emissions*

Operation of the proposed Project would generate greenhouse gas (GHG) emissions associated with the use of on-road mobile vehicles, electricity, natural gas, water, landscape equipment, generation of solid waste and wastewater, and construction activities. The proposed Project's net annual generation of GHG emissions is estimated to be 4,287.74 $CO_2$e MTY. Given the proposed Project's consistency with state, regional, and City of Los Angeles GHG emission reduction goals and objectives, the proposed Project is consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is

concluded that the proposed Project's incremental contribution to GHG emissions and their effects on climate change would be less than significant.

*(b) Consistency with Plans, Policies, or Regulations*

The proposed Project is a mixed-use high-density redevelopment project with residential and commercial uses located in an urbanized portion of the Northeast Los Angeles Community near mass transit and a broad mix of land uses. The Proposed Project's mix of residential, retail, and restaurant space, close proximity to transit, and location near a broad mix of existing land uses would reduce vehicle trips and would be consistent with the intent of both SB 32 and SB 375 with respect to reducing mobile source emissions associated with the Project's trip generation. The Proposed Project would be consistent with the goals and policies of the 2017 Scoping Plan, 2016-2040 SCS/RTP, the L.A. Green Plan/ClimateLA Program, and the Sustainable City pLAn, and with the applicable provisions of the City's Green Building Code. As such, impacts with respect to the generation of greenhouse gas emissions would be less than significant.

## (5) Hazardous Materials / Risk of Upset

*(a) Routine Transport, Use or Disposal of Hazardous Materials*

*(i) Construction*

While the 2016 Phase I Environmental Site Assessment (2016 Phase I ESA) concluded that there are no known on-site or off-site HRECs, RECs, or CRECs that would negatively affect future development of the Project Site, due to the nature of the historic uses on the site and past remediation activities, precautionary observations should be made during future property development for areas of possible contamination such as, but not limited to, the presence of underground facilities, buried debris, waste drums, and USTs, stained soil, or odorous soils. The 2016 Phase I ESA recommended that a soil management plan be prepared to address potential hazardous substances and/or petroleum products that may be encountered during site redevelopment (detailed in HAZ-PDF-1).

The proposed Project would require the routine transport, use and disposal of cleaning solvents, fuels, paints and paint-related products, waste oil, spent solvents, oily rags and other potentially hazardous materials commonly associated with construction activities. Construction activities would involve the use and storage in small quantities of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. All potentially hazardous materials used during demolition and construction activities would be handled, contained, stored, and used in accordance with all applicable local, State, and federal regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the

waste acceptance criteria of the permitted disposal facilities. Therefore, construction of the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

*(ii) Operation*

No hazardous materials other than small amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. Such materials are typically used and stored on site in quantities less than 220 pounds and are considered Conditionally Exempt Small Quantity Generators (CESQG) by the USEPA. The proposed Project would also include an urban farm, which would result in the use and transport of substances routinely associated with farming practices, such as soil amendments and fertilizers. Based on the approximate size of the urban farm being proposed (i.e., 42,000 square feet), it is anticipated that the urban farm would be classified as a Small Quantity Generator (SQG), generating between 220 and 2,200 pounds per month of hazardous waste. As such, the urban farm use must comply with USEPA requirements for managing hazardous waste, which includes obtaining an EPA Identification number and following the USEPA's recommended best management practices for transporting, storing, managing, and disposing of hazardous materials in accordance with USEPA regulations. Further, the use of these substances would comply with State Health Codes and Regulations. The operation of the proposed Project would not use, transport, or dispose of hazardous materials in large quantities (more than 2,200 pounds per month), and thus would not be considered a Large Quantity Generator (LQG). The Project's proposed buildings would comply with current regulations set by the Los Angeles Department of Building and Safety (LADBS). Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during operation, and a less than significant impact would occur.

*(b) Release of Hazardous Materials*

*(i) Construction*

The Project Site was formerly a part of the Taylor Yard. The 2016 Phase I ESA (See Appendix F) concluded that observations should be made during future property development for areas of possible contamination such as, but not limited to, the presence of underground facilities, buried debris, waste drums and underground storage tanks (USTs), stained soil or odorous soils. As such, the proposed Project would implement Project Design Feature HAZ-PDF-1, which requires the preparation and implementation of a Soil Management Plan to address potential hazardous substances and/or petroleum produces that may be encountered during construction.

Should such materials be encountered, further investigation and analysis may be necessary at that time. Additionally, the proposed Project would be required to obtain approval from the Fire Department and the Department of Public Works for the transport, creation, use, containment, treatment, and disposal of the hazardous materials prior to the issuance of a use of land or building permit. Adherence to applicable regulatory compliance measures and incorporation of HAZ-PDF1 would further ensure the proper handling and disposal of any potential hazardous materials if any unforeseen hazardous materials or soils are encountered during the site clearing and grading/excavation phases. As stated above, adherence to all applicable rules and regulations pertaining to the use, storage, and transport of potentially hazardous materials during construction would reduce potentially significant impacts to less-than-significant levels.

*(ii) Operation*

With respect to operations, the proposed Project would not transport, use, or dispose of hazardous materials as a normal course of operation that would result in reasonably foreseeable upset or accidental conditions. The volume and type of products and chemicals used in typical multi-family and mixed-use developments are those involved in the cleaning and maintenance of residential and commercial retail properties, including restaurants and public spaces. Additionally, the proposed urban farm would be expected to store and use fertilizers in small quantities on-site. All materials used and stored on-site would be regulated and managed in accordance with manufacturers materials data sheets and all applicable rules and regulations. As such, the proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

*(c) Hazardous Emissions Near School*

The Los Feliz Charter School for the Arts, located at 2709 Media Center Drive, is the only school within a 0.25-mile radius of the Project Site. No hazardous materials other than small amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes, and substances routinely used with urban farming, would be utilized on the Project Site. As stated above, the urban farm would be considered a SQG and would transport, store, manage and dispose of any hazardous materials in accordance with the USEPA's best management practices for SQGs. The use of these substances would also comply with State Health Codes and Regulations. Any hazardous materials would be handled, transported and disposed in accordance with all applicable local, State and federal regulations. As such, the proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials,

substances, or waste within one-quarter mile of an existing or proposed school and, as such, would have a less-than-significant impact upon the nearby school.

*(d) Listed on Government Database*

The Project Site is identified on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Specifically, the Project Site is identified on the following databases: FINDS, CA HAZNET, CA EMI, RCRA-LQG, US AIRS, and EDR US Historical Auto Station. Additionally, the Project Site was formerly a part of the Taylor Yard property, which was identified as an UST, AST, Toxic Pits, Cortese, Historical Cortese, LA County Site Mitigation, VCP, Response, EnviroStor, Historical Cal-Site, CA Bond Plan, RCRA Generator, SLIC, Financial Assurance, CERCLIS NFRAP, CHMIRS, and WDS site in the 2016 Phase I ESA. The 2016 Phase I ESA concluded that no further action is necessary with regard to the Project Site's listing on the FINDS, CA HAZNET, CA EMI, RCRA-LQG, US AIRS, and EDR US Historical Auto Station databases as evidence of RECs and CRECs was not identified on the Project Site.

Based on a review of state and federal records and databases to evaluate present and historic uses on the Project Site, a review of prior Phase I ESA's, the Phase II ESA and a Groundwater Monitoring Report conducted for the Project Site and adjacent Taylor Yard properties, a Human Health Risk Assessment conducted for Project Site, as well as a Project Site reconnaissance, the 2016 Phase I ESA concluded that precautionary observations should be made during future property development for areas of possible contamination, such as, but not limited to, the presence of underground facilities, buried debris, waste drums, and USTs, stained soil, or odorous soils. As such, the proposed Project would implement HAZ-PDF-1, which requires the preparation and implementation of a Soil Management Plan to address potential hazardous substances and/or petroleum products that may be discovered during construction. Additionally, the proposed Project would be required to obtain approval from the LAFD and the Department of Public Works for the transport, creation, use, containment, treatment, and disposal of the hazardous materials prior to the issuance of a use of land or building permit. Construction and operation of the proposed Project would not create a significant hazard to the public or the environment as a result of being on a list of hazardous materials site pursuant to Government Code Section 65962.5. Adherence to applicable regulatory compliance measures and implementation of HAZ-PDF-1 would ensure any potential hazardous impacts during the construction phase are less than significant.

*(e) Interfere with Emergency Response or Evacuation Plan*

With respect to off-site emergency evacuation route impacts, the Project Site is not located on or near a City-designated selected disaster route. All construction activities resulting in temporary alterations to public access and right-of-way would be subject to the LADBS and Los Angeles Department of Transportation (LADOT) permitting processes. The Proposed Project would not interfere with emergency response or an evacuation plan during construction.

It is anticipated that approval of the proposed Project would be conditioned on providing an additional emergency secondary access/egress route to/from the Proposed Project Site. To comply with this anticipated condition, the Applicant would implement one of the following three options:

- Option 1: An emergency access gate from the west side of the Project Site connecting to the existing service road on the east bank of the Los Angeles River Channel accessible via Fletcher Drive. This option would require obtaining permission from the LADWP;

- Option 2: An emergency access gate and driveway from the northbound onramp of SR-2, immediately north of an adjacent to the Project Site. This option would require approval from Caltrans; and

- Option 3: An emergency access gate on the south side of Casitas Avenue providing access through the future Bow Tie Park. This option would necessitate improving and paving an approximate 1.2-mile access road through a currently vacant site (which is planned for future parkland) and would require obtaining the permission of the State Parks Department.

The acquisition and maintenance of a secondary emergency access point would provide additional and improved emergency access to the Project Site and would facilitate a better response from the LAFD in the event of an emergency. Further, site plans must be submitted to the LAFD and the Los Angeles Police Department (LAPD) for their review and approval prior to the issuance of building permits. Emergency vehicle access to the Project Site would continue to be provided from local public roadways. Thus, the proposed Project would have a less-than-significant impact upon emergency response or evacuation plans.

## (6) Land Use and Planning

### *(a) Consistency with Land Use Plans, Policies, and Regulations*

#### *(i) Local Plans*

The Project Site has a General Plan land use designation of Heavy Manufacturing and is currently zoned as [Q]PF-1-CDO-RIO. The City inadvertently rezoned the Project Site in 2010, and the current zoning and land use designations on-site do not correspond with one another. The Heavy Manufacturing land use designation corresponds with a M3 zone or P zone. The zoning designation of "PF" corresponds with a land use designation of Public Facilities. As part of the proposed Project, the Applicant is requesting a Zone Change from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO pursuant to LAMC Section 12.32. Additionally, the Applicant is requesting a General Plan Land Use Amendment to change the General Plan land use designation from Public Facilities to Limited Industrial pursuant to LAMC Section 11.5.6. The CM zoning designation corresponds with the Limited Industrial land use designation. The proposed Project would rectify the discrepancy between the existing zoning and General Plan land use designation that currently exist on-site. With approval of the discretionary actions, the proposed Project would result in a less than significant impact in relation to zoning and land use designations.

The proposed Project would conform to the applicable objectives outlined in the City of Los Angeles General Plan, and is substantially consistent with the policies and objectives of the following components of the General Plan: Framework Element, Housing Element, Air Quality Element, Conservation Element, Safety Element, Mobility Plan 2035, Noise Element, Plan for a Healthy Environment, and Land Use Element (Northeast Los Angeles Community Plan). Further, the proposed Project is substantially consistent with the applicable policies of the City of Los Angeles LAMC. The proposed Project would also support the applicable standards and regulations for development for the River Improvement Overlay District, the Cypress Park and Glassell Park Community Design Overlay District, and City Planning Commission ZI No. 2427.

#### *(ii) Zoning Information Files*

The East Los Angeles Enterprise Zone / Employment and Economic Incentive Program Area (ZI No. 2129) sets additional provisions for parking and height. Consistent with development within an Enterprise Zone, the proposed Project would provide vehicular parking for its proposed 64,000 square feet of commercial floor area at a ratio of one parking spot per 500 square feet. The proposed Project would be consistent with the East Los Angeles Enterprise Zone (ZI No. 2129).

The Project Site is located within Metro Rail Project area (ZI No. 1117). ZI No. 1117 indicates that prior to the issuance of any building permit within 100 feet of the Metro Rail construction area, a development project must obtain clearance from Metro. Development of the proposed Project would coordinate with Metro to obtain necessary clearance. As noted in Metro's response letter to the NOP, the project Applicant will be required to notify Metro and SCRRA of any changes to the construction or building plans that may or may not impact the right-of-way.

The proposed Project is subject to the advisory notice and recommendations contained in ZI No. 2427. The proposed Project would introduce residential uses to an area, which currently does not contain residential land uses. The Project Site is within 1,000 feet of the Glendale Freeway (SR-2), which is located to the west and north of the Project Site, Based on the findings in the Health Risk Assessment (HRA), the Project Site's worst-case ground level location would be exposed to carcinogenic risks below 10 per one million for the 9-year and 30-year residential scenarios, all acute and chronic health hazard indices would be under the SCAQMD recommended threshold of 1.0, and all criteria pollutants would be below the ambient air quality state and national standards. As such, no special project design features are warranted for the proposed Project. Nevertheless, as required by the LAMC, the Project will include air filtration systems with filters meeting or exceeding the ASHRAE 52.2 Minimum Efficiency Reporting Value (MERV) of 13 pursuant to LAMC Section 99.04.504.6 for new ventilated buildings within 1,000 feet of a freeway (Ordinance 184245). As such, the Project would be consistent with the City of Los Angeles Planning Commission ZI No. 2427 and the LAMC. Additionally, the California Air Resources Board's technical advisory identifies a number of strategies to reduce air pollution exposure near high-volume roadways. The Project would be consistent with several effective strategies to reduce future resident's exposure to poor ambient air quality. As such, impacts associated with developing residential land uses in close proximity to a freeway would be considered less than significant.

*(iii) Regional Plans*

The proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the proposed Project. Therefore, the proposed Project would be consistent with the AQMP.

The 2016-2040 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals. On a policy level, the proposed Project is consistent with the goals and strategies of the 2016-2040 RTP/SCS, as the proposed Project would revitalize an underutilized, fully-developed property. With respect to regional growth forecasts, the proposed Project would construct 419 multi-family residential units that would result in approximately 1,090

permanent residents in the City of Los Angeles. The proposed increase in housing units and population would be consistent with the growth projections in SCAG's 2016-2040 RTP/SCS, and a less-than-significant impact would occur.

The proposed Project would not conflict with any of the applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect, and, as such, land use impacts would be less than significant.

## (7) Noise

### *(a) Construction Noise*

#### *(i) On-Site Construction Noise*

The increase in outdoor noise levels at the off-site locations during construction would be temporary in nature and would only occur periodically, not continuously throughout the construction day. These noise levels would represent short-term, but substantial, noise level increases compared to the existing noise level range of 54.1 to 60.6 dBA $L_{eq}$. The land uses surrounding the Project Site are predominately residential, educational, and industrial. Outdoor noise levels are not projected to be exceeded by 5 dBA or more on a temporary and intermittent basis for any of the surrounding sensitive receptors. Additionally, the northeast property line of the Project Site is bordered by an earth berm that would attenuate noise between the Project Site and Los Feliz Charter School for the Arts. The Glendale Freeway is also located on top of a vegetated earth berm near the residential neighborhood west of the Project Site. The additional attenuation by the intervening topographical grade would provide an approximate 10-dBA attenuation factor. The Glendale Freeway would also attenuate construction noise between the Project Site and residential neighborhood. Thus, the highest noise levels during construction would not exceed the 5 dBA threshold at off-site sensitive receptors. However, to ensure the noise levels remain below the threshold levels, Project Design Features NOI-PDF-1 and NOI-PDF-2 would be implemented to reduce temporary noise impacts during the construction period. Therefore, there would not be a substantial temporary or periodic increase in ambient noise levels from construction activity at any of the identified off-site sensitive receptors.

#### *(ii) Off-Site Construction Noise*

In addition to on-site construction noise sources, other noise sources may be generated off-site resulting from materials delivery, concrete mixing trucks, haul trucks, and construction trucks from workers accessing the Project Site during construction. The highest level of noise from these noise sources would be generated by haul trucks for demolition debris and soil export during the first four months of construction. The proposed haul route to and from I-5 would utilize Casitas Avenue and Carillon Street to

Fletcher Drive, then to the Fletcher Drive on- and off-ramps of I-5 (northbound and southbound), and dispose waste at the Sunshine Canyon Landfill.

The highest number of haul trips would occur during the two-month grading/excavation phase, generating approximately 2,858 one-way haul trips, or roughly 66 trips per day (33 inbound and 33 outbound) distributed over an approximate two-month period. The addition of 66 haul trucks per day would generate an approximate 9-percent increase in traffic noise levels at the least traveled street segment along the designated haul route. The highest increase in noise levels would be along Carillon Street, which is estimated to increase noise levels by 3.42 dBA CNEL above the existing ambient noise levels. Haul truck noise increase would be below the significance criteria for the haul route's street segments. As such, the hauling activities during construction would result in a less-than-significant impact to off-site noise receptors.

*(b) Operational Noise Levels*

*(i) Outdoor Activity Noise*

The noise levels of the outdoor use areas (i.e., courtyard, outdoor restaurant, and beer garden patio) were calculated relative to the three identified sensitive receptors. Outdoor amplified sound systems (e.g., speaker and stereo systems or other sound producing devices) will be designed so as not to exceed 5 dBA (hourly $L_{eq}$) above ambient noise levels at any off-site noise-sensitive receptor (see Project Design Feature NOI-PDF-4, above). Additionally, the perimeter of the outdoor restaurant seating areas will be designed with a five-foot high glass, plexiglass, or other solid barrier to confine noise within the outdoor seating area (see Project Design Feature NOI-PDF-5, above). The anticipated outdoor noise impacts at the nearest noise-sensitive receptors would not exceed the significance criteria noise level at any of the sensitive receptors.

*(ii) Mechanical Equipment and HVAC Noise*

As part of the proposed Project, new mechanical equipment, HVAC units, and exhaust fans would be installed on the roof of the proposed new structures and designed to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Based on the approximate distances to the nearby sensitive receptors, the estimated noise levels at nearby sensitive receptors from HVAC equipment would range from 40.1 dBA $L_{eq}$ to 40.2 dBA $L_{eq}$, which would be below the 5-dBA $L_{eq}$ increase above ambient noise levels at the sensitive receptors. As such, noise from mechanical equipment would be less than significant at nearby sensitive receptors.

*(iii) Loading Dock, Trash Collection, and Parking Garage Noise*

Noise levels from the parking garage are anticipated to be highest during the A.M. and P.M. peak hours from vehicle engines, tires squealing, doors closing, car alarms, and people talking. The proposed Project's highest peak hourly traffic volumes would be 239 vehicles, generated during the P.M. commuter peak hour, which would contribute to the highest noise level. The parking garage would also serve as a loading dock and trash collection areas for the proposed urban farm/greenhouse operations that are proposed on the rooftop level of the parking garage. Based on measured noise levels from typical loading dock facilities and trash collection areas, noise levels within the lower level of the parking structure would be expected to range from 72.0 dBA $L_{eq}$ to 66 dBA $L_{eq}$ at a distance of 50 feet. The estimated existing ambient plus Project noise levels from the parking garage, loading dock, and trash compactor would not exceed the 5-dBA increase above ambient noise levels threshold at all three sensitive receptor locations. As such, noise from the parking structure would be less than significant at nearby sensitive receptors.

*(iv) Composite Noise Levels*

On-site noise sources associated with the proposed Project would include the outdoor courtyard, outdoor restaurant, outdoor beer garden, mechanical HVAC equipment, the parking structure, loading dock, and trash compactor. Composite noise levels were estimated to analyze the impact from the combination of all on-site noise sources from the Project Site to the surrounding sensitive receptors. When analyzed together, the proposed Project would have a maximum CNEL increase of 4.16 dBA for Sensitive Receptor No. 1, the Los Feliz Charter School to the northeast. Therefore, it is anticipated that the combination of operational activities from the proposed Project would not exceed the 5-dBA increase threshold for any of the sensitive receptors. Therefore, the proposed Project would not increase ambient noise levels by 5 dBA, and a less than significant impact would occur.

*(c) Construction Vibration*

*(i) Human Annoyance*

Persons in the multi-family residential buildings south of the Project Site, the residential neighborhoods west of the Project Site, and the students and staff of the Los Feliz Charter School for the Arts could be exposed to increased vibration levels on a temporary and intermittent basis during the construction period. However, several barriers are located between the identified sensitive receptors and the Project Site that would help to attenuate groundborne vibration. Additionally, groundborne vibration is

further attenuated when traveling through an unpaved surface compared to a surface that is paved with cement or asphalt. Construction generated vibration would be below the applicable significance criteria for human annoyance and would, therefore, not be a potential source of human annoyance to any of the nearby sensitive receptors. Vibration levels at sensitive receptors located farther away from the Project Site would be even lower. As such, human annoyance impacts with respect to construction-generated vibration increases would be less than significant.

*(ii) Building Damage*

For purposes of assessing potential groundborne vibration impacts with respect to structural damage, two adjacent properties were identified as having structures in proximity to the Project Site to warrant analysis; the Extra Space Self-Storage facility at 2904 Casitas Avenue and the railroad tracks within the Metro Right-of-Way. The self-storage facility is a two-story structure of modern construction and is separated from the Project Site by a 25-foot building setback and driveway access lane. The Metro Right-of-Way easement is located approximately 100 feet to the east of the Project Site. As required by ZI-1117, consultation with Metro is required prior to the issuance of any building permit for projects within 100 feet of Metro-owned Rail Right-of-Way. The vibration levels at each of the closest sensitive receptors would be a maximum of 0.09 in/sec PPV, which is well below the applicable significance threshold for building or foundational damage. Vibration levels at sensitive receptors located farther away from the Project Site would be even lower. As such, impacts with regard to building damage from construction vibration would be less than significant.

*(iii) Haul Trucks*

During the course of the combined excavation and other construction activities, it is anticipated that 14 cy capacity haul trucks would be used to export the soil and construction/demolition debris and would occur uniformly predominately outside of peak hours. A Haul Truck Route would be identified for the proposed Project and approved by LADOT as part of the Construction Traffic Control/Management Plan (refer to Project Design Features PDF-TRANS-1 and PDF-TRANS-2). The proposed haul route would travel through the residential streets northwest of the Project Site. Trucks and buses typically generate groundborne vibration velocity levels of around 63 VdB at 50 feet. These residents already experience trucks leaving and entering the existing manufacturing and production uses on the Project Site. Therefore, haul trucks traveling along Larga Avenue are not expected to significantly increase vibration impacts to these residents. Also, since haul truck loading and unloading activities would occur on-site and/or within the boundaries of an approved Construction Traffic Control/Management Plan and during the acceptable hours as required by the Noise Ordinance and Project

Design Feature NOI-PDF-1, the vibration impacts from haul trucks would be considered less than significant.

*(d) Operational Vibration*

*(i) Human Annoyance*

The proposed Project would include a mixed-use residential and commercial development that would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large manufacturing and industrial projects. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur a few times a week and would not be any different than those presently occurring in the vicinity of and on the Project Site. As such, human annoyance vibration impacts associated with operation of the proposed Project would be less than significant.

*(ii) Building Damage*

Heavy-duty refuse trucks typically generate groundborne vibration velocity levels of around 63 VdB at 50 feet, which is equivalent to approximately 0.008 in/sec PPV. The thresholds levels for building damage for the Extra Space Self-Storage facility and the Metro Right-of-Way are 0.05 in/sec PPV. The estimated groundborne vibration velocity levels from refuse trucks would be far below the significance threshold for building and foundational damage. Therefore, impacts with regard to building damage from operational vibration would be less than significant.

## (8) Population and Housing

*(a) Population Growth*

The proposed Project is anticipated to generate a number of skilled construction-related jobs during its buildout. Most construction workers would not be expected to relocate their place of residence as a consequence of working on the proposed Project. As such, a substantial number of new permanent residents would not be generated as a result of the construction of the proposed Project, and impacts associated with population growth due to temporary construction jobs would be less than significant.

The proposed Project's 419 dwelling units would generate approximately 1,090 new residents. The estimated population projections were based on an average household size of 2.6 persons per multi-family dwelling unit, which is consistent with the most recent statistical information provided by the SCAG. The proposed Project's estimated 1,090 future residents represent approximately 0.75 percent of the total population growth anticipated to occur within the City of Los Angeles between 2017 and 2023. The

1,090 new residents anticipated to be generated by the proposed Project would result in a negligible increase in the City's population growth and is within SCAG's population growth projections for the City of Los Angeles. When added to the projected 2017 population estimate of 4,055,008 persons, the proposed Project's additional 1,090 residents would still be within the total citywide population forecasted for the year 2023. Therefore, the proposed Project's population growth is accounted for in the citywide and regional population projections. The proposed Project would result in a less-than-significant impact to population increase in the City during its operation.

*(b) Housing Growth*

There are no existing residences or residential uses on the Project Site. Therefore, the proposed Project would not remove any existing dwelling units or displace any existing residents. The proposed Project's 419 dwelling units would represent approximately 0.71 percent of SCAG's citywide housing growth projections between 2017 to 2023 timeframe. The proposed Project would not exceed the housing growth estimates for 2023. The proposed Project would help address the City's goals of increasing housing units within the City in an area that has the infrastructure to accommodate such growth, and diversifying the housing stock. As such, the proposed Project would not generate substantial demand for new housing, and a less-than-significant impact would occur.

## (9) Public Services

*(a) Fire Protection*

*(i) Construction*

Project construction would not be expected to impact fire protection and emergency services to the extent that there would be a need for new or expanded fire facilities, in order to maintain acceptable service ratios, emergency response, or other performance objectives of the LAFD, the construction of which could cause significant environmental impacts. Moreover, as discussed in Section IV.K. Traffic/Transportation, the Applicant will be required to develop a Construction Traffic Control/Management Plan prior to construction to minimize the effects of construction on vehicular and pedestrian circulation (refer to TRANS-PDF-1). Therefore, construction-related impacts to fire protection services would be less than significant.

*(ii) Fire Protection Facilities, Services, and Response Distance*

The Project Site is served by Fire Station No. 50, located at 3036 Fletcher Drive, approximately 0.6 mile from the Project Site. The proposed Project would increase the number of persons on the Project Site, which would potentially increase the demand for

LAFD services. Based on correspondence with the LAFD, fire protection response is considered adequate with respect to response distances and performance standards regarding emergency response. Although the Project Site's distance is considered adequate, fire sprinkler systems would be installed and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems etc.) per the City of Los Angeles Fire Code. The proposed Project would not require new or expanded fire facilities in order to maintain service, the construction of which could cause significant environmental impacts, and impacts would be less than significant.

*(iii) Emergency Access*

The proposed Project would not involve activities during its operational phase that could impede public access or travel upon public right-of-way or would interfere with an adopted emergency response or evacuation plan. The Applicant is seeking to obtain a secondary emergency access point to access the Project Site from a point other than the main driveway on Casitas Avenue. The proposed Project would be conditioned on acquiring and maintaining an emergency access route from one of the following three options: (1) creating a new emergency access easement from the Glendale Freeway eastbound on ramp at Fletcher Drive, (2) utilization of the LADWP access road on the east bank of the LA River, or (3), ensuring an unobstructed access route through the State Park land to the south of the Project Site. The acquisition and maintenance of a secondary emergency access point would provide additional and improved emergency access to the Project Site and would facilitate a better response from the LAFD in the event of an emergency. As such, impacts associated with emergency access would be less than significant.

*(iv) Fire Flow*

Hydrants, water lines, and the water tanks would be installed per Fire Code requirements and would be based upon the specific land uses of the proposed Project. Based on correspondence with the LAFD, improvements to the water system may be required for this project to provide 12,000 and 2,000 to 8,000 gpm fire flow. The Project Applicant would be required to ensure adequate fire flows and infrastructure pursuant to the LAFD Fire Code. Therefore, With respect to fire flows, through compliance with standard regulatory processes and requirements fire protection would be adequate and the proposed Project's impact upon fire protection services would be less than significant.

*(b) Police Protection*

*(i) Construction*

The proposed Project has the potential to adversely affect police services during the construction period due to an increased potential for trespassers, theft, and vandalism, which would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. With implementation of Project Design Feature POL-PDF-1, which would provide construction fencing and screening of the construction activity from view at the local street level and locked entry to limit access by the general public. In addition, a construction work site traffic control plan would be submitted to LADOT for review and approval prior to the start of any construction work as is standard protocol (Project Design Feature TRANS-PDF-1). Impacts to police services from Project construction activities would be less than significant.

*(ii) Operation*

The proposed Project has the potential to place additional demands upon police protection services during operation as a result of the addition of the mixed-use residential and commercial development. Based on correspondence with the LAPD, the proposed Project would consult with the LAPD's Crime Prevention Through Environmental Design personnel regarding the incorporation of intrusion prevention systems and crime prevention features. Additionally, the Applicant will also submit a diagram of the Project Site to the LAPD's Northeast Area Commanding Officer that includes access routes and any additional information that might facilitate police response (Project Design Feature POL-PDF-2). Furthermore, the proposed Project would be required to implement safety measures as recommended by the LAPD, including nighttime security lighting of building entries and walkways, private on-site security, a closed circuit security camera system, and secure parking facilities with sufficient lighting to maximize visibility and reduce areas of concealment (Project Design Feature POL-PDF-3). With incorporation of security/design measures, the proposed Project would not require new or expanded police facilities in order to maintain acceptable service, the construction of which could cause significant environmental impacts, and impacts related to police services would be reduced to less than significant levels.

*(c) Schools*

The proposed Project is estimated to generate approximately 87 additional elementary students, 24 middle school students, and 48 high school students for a total of 159 students. While two schools serving the Project Site are below capacity, one school serving the Project Site would experience overcrowding in the future. However, the

mandatory payment of developer fees to the LAUSD are deemed to provide full and complete mitigation of school facilities impacts. The manner in which LAUSD would accommodate the additional high school students resulting from the proposed Project is subject to separate planning and CEQA review by LAUSD. Upgrades to existing schools and the construction of new schools is addressed by the LAUSD's Facilities Services Division. The payment of developer fees by the proposed Project would be mandatory, and would reduce the cumulative impact upon school services to a less-than-significant level.

*(d) Parks and Recreation*

Based on the City's standard parkland ratio goal of two acres per 1,000 residents, the proposed Project would generate a need for approximately 2.18 additional acres of public parkland. This need would be met through a combination of on-site open space and amenity areas and monetary contributions to the Park and Recreational Sites and Facilities Fund for the provision of recreation and park facilities in the Project vicinity. The proposed Project includes the development of 419 dwelling units and, thus, is subject to the open space requirements of LAMC Section 12.21.G. The proposed Project would provide approximately 58,176 square feet of total common open space and amenities on-site available exclusively to serve Project residents and their guests. In addition to the on-site open space provided within the proposed Project, the proposed Project is required to pay applicable Quimby fees and a Dwelling Unit Construction Tax in accordance with LAMC Section 21.20.3(a)(1) for the construction of residential dwelling units. This fee would be deposited into a trust fund managed by the DRP for the sole purpose of park and recreational facility acquisition, expansion, and improvement. Therefore, under the City's Dwelling Unit Construction Tax fee, which is collected prior to a certificate of occupancy for residential land uses, the proposed Project's impact upon parks and recreational facilities would be less than significant.

*(e) Libraries*

Development of the Proposed Project would include the construction of 419 residential dwelling units and 64,000 square feet of commercial space. It is estimated that the development of the Proposed Project would result in an increase of up to 1,090 new residents to the Northeast Los Angeles Community Plan area and would therefore create an additional demand on the local library facilities. Currently, there are no plans to construct any new library facilities in the local area. It is anticipated that the existing libraries within the Project area would be able to meet the Proposed Project's demand for library services. As stated in the 2015-2020 Strategic Plan, LAPL is committed to increasing the number of people who use library services and the number of library cardholders. Therefore, the Proposed Project's impacts upon library services would be considered less than significant.

## (10) Public Utilities

### *(a) Water Supply and Infrastructure*

#### *(i) Water Infrastructure*

The Project area is currently served by adequate potable water infrastructure. Construction of the proposed Project would require the contractor to connect to the existing potable water infrastructure in the proposed Project's service area to serve the proposed Project's operational demands. Although new service connections have the potential to result in short term and temporary interruptions in water services for existing customers, new water service installations are generally connected so as to avoid water service interruption. Advisory notices are also distributed to the affected area to inform affected LADWP water customers of any planned disruptions in service. If any disruptions in local water service occur during the construction period, any disruptions would be temporary and short in duration.

The proposed Project would not exceed the available capacity within the water distribution infrastructure that would serve the Project Site. Accordingly, the proposed Project would not require or result in the construction or relocation of new water facilities or expansion of water facilities, the construction or relocation of which could cause significant environmental effects. In addition, the water distribution capacity would be adequate to serve the proposed Project. Therefore, the proposed Project's operational impacts on water infrastructure would be less than significant.

#### *(ii) Water Supply*

Operation of the proposed Project would result in a net increase of 85,023 gpd (approximately 95 AFY) of potable water. Development of the proposed Project is not expected to measurably affect the LAAFP's capacity to continue to serve the Project Site and surrounding areas; therefore, no new or expanded water treatment facilities would be required. The Department of Water and Power's water supplies available during normal, single-dry, and multiple-dry water years, as included in the 25-year projection contained in its 2015 UWMP, would meet the projected water demand associated with the proposed Project, in addition to the existing and other planned future uses of LADWP system. Because the water demands of the proposed Project are within the 25-year water demand growth projected in the UWMP and water supplies are considered to be reliable, impacts associated with regional water supplies would be less than significant.

*(b) Wastewater*

*(i) Wastewater Infrastructure*

The Project area is presently served by a network of sewer lines that convey sewage from the Project Site to the Hyperion Water Reclamation Plant (HWRP Based on current gauging information provided by the Bureau of Sanitation (BOS), the sewer system might be able to accommodate the total flow for the proposed Project. Further detailed gauging and evaluation would be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity to accommodate the proposed Project's wastewater flows, the Applicant would be required to build sewer line to a point in the sewer system wither sufficient capacity. A final approval for sewer capacity and connect permit would be made at the time. Due to the Project Site's location at the end of a cul-de-sac, any temporary impacts to sidewalks and/or partial lane closures on Casitas Avenue would not significantly impact roadway traffic or pedestrian routes. Therefore, proposed Project impacts with respect to the existing wastewater infrastructure would be less than significant.

*(ii) Wastewater Treatment Capacity*

The proposed Project would result in a net increase 84,633 gpd of wastewater. Sewage generated by the proposed Project would be conveyed and treated at the HWRP, which has adequate capacity to accommodate the increased wastewater flows, which has the capacity to accommodate approximately 175 mgd of wastewater above current wastewater flows. Thus, RWQCB treatment standards area would be maintained and impacts would be less than significant.

*(c) Solid Waste*

*(i) Solid Waste Generation and Landfill Capacities*

(a) Construction

The proposed Project's demolition and construction activities are estimated to generate approximately 10,658 tons of construction and demolition debris. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Assuming a 50 percent reduction in construction and demolition debris, the total amount of construction and demolition debris to be disposed of at area landfills is estimated to be 5,329 tons.

The Sunshine Canyon, Chiquita Canyon, and Azusa Reclamation Landfills are likely disposal sites for the Project's demolition and construction debris and inert soil

materials. For recycling efforts, the Waste Management Downtown Diversion accept construction waste for recycling. Given the existing available waste processing and disposal intake capacities at regional facilities, the proposed Project's construction related solid waste impact upon the local waste diversion center and regional landfill capacities would be less than significant.

(b) Operation

Operation of the proposed Project would cause on-going generation of solid waste throughout the lifespan of the proposed Project. The proposed Project's solid waste would be handled by private waste collection services. Pursuant to Section 66.32 of the LAMC, the proposed Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from LASAN. The proposed Project would generate approximately 3,883 pounds (1.94 tons) of solid waste per day or approximately 709 tons per year. This estimate is conservative, as it does not factor in the amount of solid waste being recycled as a result of implementing on-site recycling areas.

The Sunshine Canyon Landfill and the Chiquita Canyon Landfill combined have a remaining permitted intake of approximately 120 million tons. Additional solid waste demands generated by the proposed Project could be readily accommodated by the existing and proposed regional landfill operations without the need to expand additional operations or divert existing waste streams to alternative locations. However, because the existing landfills' capacities are finite and the overall capacity will be reduced over time, additional landfills and solutions to address the ongoing regional solid waste demands of the City beyond the remaining lifespans will need to be addressed on a regional basis. Regional landfill capacity and future long term planning efforts, however, are more appropriately addressed in the cumulative impacts discussion below. For purposes of a Project specific impact conclusion, the amount of solid waste generated by the proposed Project is within the available lifetime and daily capacities of area landfills. Therefore, with respect to solid waste generation and impacts on solid waste facilities, the proposed Project's impacts would be less than significant.

*(ii) Consistency with Solid Waste Statutes and Regulations*

As described above, the proposed Project's solid waste would be handled by private waste collection services. Pursuant to Section 66.32 of the LAMC, the Proposed Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the Bureau of Sanitation. The Proposed Project would be required to comply with LAMC Section 12.21 A.19, which requires new development to provide an adequate recycling area or room for collecting and loading recyclable

materials. Additionally, the Proposed Project would be required to comply with CALGreen Code waste reduction measures for the operation of the Proposed Project. The Proposed Project would generate solid waste that is typical of a residential mixed-use building with ground floor office and retail uses that would comply with all federal, state, and local statutes and regulations regarding proper disposal. Therefore, impacts would be less than significant.

*(d) Electric Power, Natural Gas and Telecommunications Infrastructure*

*(i) Electric Power*

During Project construction, electricity would be consumed, on a limited basis, to power lighting of the Project Site and the temporary operation of an approximate 1,000 square foot construction trailer. Electricity would also be used indirectly for the treatment and conveyance of water used during construction for fugitive dust control. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. The total estimated electricity use from construction activities is 25,915 kilowatt-hours (kWh). The energy demands during construction would be less than the demand generated by the existing uses and thus would not necessitate additional energy facilities or distribution infrastructure.

The proposed Project would be able to connect to and would be served by the existing power grid serving the Project Site. The estimated net increase in electricity demand by the proposed Project is estimated to be approximately 1,337,720 kWh/year. Correspondence with LADWP discusses the availability of sufficient electric resources to supply the proposed Project's demand. Establishing electric power service to the proposed Project would involve disconnecting existing power connections and establishing new connections to serve the proposed structures. Such improvements would be localized in nature and would include service connections to overhead power poles and/or existing underground transformers. Thus, the proposed Project would not require or result in the relocation or construction of electric power facilities, which could cause significant environmental effects, and impacts would be less than significant.

*(ii) Natural Gas*

The proposed Project would increase demand for natural gas service on the Project Site. The proposed Project's net natural gas demand is estimated to be approximately 3,372,230 kBTU/year, or approximately 275,509 cf/month. As natural gas service is currently supplied to the Project Site, the site is accessible to existing service lines. Establishing natural gas service to the proposed Project would involve disconnecting existing connections and establishing new connections to serve the proposed structures. Such improvements would be localized in nature and would involve minimal

trenching to access natural gas utility lines on or adjacent to the Project Site. As such, the proposed Project would not require or result in the relocation or construction of natural gas facilities, which could cause significant environmental effects, and impacts would be less than significant.

*(iii) Telecommunications Systems*

Telecommunication services within the City of Los Angeles is currently provided by several commercial service providers, including AT&T, Charter/Spectrum, Cox Communications, Frontier, and Race Communications. The Project Site is currently developed with an operational warehouse/light manufacturing/film production use, and is served by existing telecommunications infrastructure. Establishing service to the proposed Project would involve disconnecting existing connections and establishing new connections to the proposed structure. Such improvements would be localized in nature and would utilize existing conduit and service lines. Thus, the proposed Project would not require or result in the relocation or construction of telecommunication facilities which could cause significant environmental effects, and impacts would be less than significant.

## (11) Traffic/Transportation

*(a) Consistency with Programs, Plans, Ordinances and Policies Addressing Circulation System*

The Transportation Element of the City's General Plan, the "Mobility Plan 2035," offers a comprehensive vision and set of policies and programs the City aims to achieve to provide streets that are safe and convenient for all users. In general, the proposed Project would promote the five broad goals of the Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect. The proposed Project is located on a cul-de-sac. The Mobility Plan 2035 discourages the use of cul-de-sacs that do not provide access for active transportation options. This reduced network connectivity has greater impacts on pedestrians and bicyclists, as the increased trip distances discourage active modes of transportation. The proposed Project would be consistent with the Mobility Plan 2035's policy recommendation to design cul-de-sacs with through access for pedestrians and bicycles. A designated fire lane and pedestrian walkway separating Buildings A and G (parking garage) and pedestrian corridor between Buildings C and D, would provide pedestrian access to a designated fire lane improved with a walking path along the southern and eastern property lines adjacent to the LA River corridor and proposed Bowtie Park property. These linkages would connect the on-site residential uses and neighboring residential uses to the proposed creative office space and neighborhood serving commercial land uses. As such, the proposed Project would not conflict with the goals of the Mobility Plan 2035.

In accordance with LADOT's Traffic Assessment Guidelines (July 2019), a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent. Section IV.K Traffic/Transportation, provides responses to the list of policy related questions, as recommended by LADOT, in order to help determine whether the proposed Project conflicts with the City's circulation system policies. The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

*(b) Consistency with CEQA Guidelines Section 15064.3 subdivision*

Pursuant to Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the State CEQA Guidelines, the City of Los Angeles adopted vehicle miles traveled (VMT) as the criteria by which to determine transportation impacts under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement, vehicle miles traveled (VMT), that addresses the state's goals on reduction of GHG emissions, creation of a multi-modal transportation network, and promotion of compact, mixed-use development patterns.

As concluded in the VMT Analysis (See Appendix J.1 to this Draft EIR), the proposed Project is expected to generate a net increase of 2,539 daily trips based on the VMT Calculator tool methodology. With the proposed Project, the Household VMT per Capita would be 12.7 compared to the threshold of 7.2, and the Work VMT per Capita would be 14.9 compared to the threshold of 12.7. Therefore, the Project would cause significant VMT impacts for both Household VMT and Work VMT. With mitigation measures incorporated, the Household VMT per Capita would be reduced to 10.5 compared to the threshold of 7.2, and the Work VMT per Capita would be reduced to 14.2 compared to the threshold of 12.7. As such, the proposed Project's VMT impacts per household and per capita would remain significant and unavoidable after mitigation.

*(c) Geometric Design*

The proposed Project does not propose any roadway infrastructure improvements that would result in sharp curves or dangerous intersections. No incompatible uses or operations are proposed that would cause or result in incompatible equipment being used on site or on local roadways. As such the proposed Project's impact related to the potential to substantially increase any roadway or design hazards would be less than significant.

*(d) Emergency Access*

*(i) Construction*

The proposed Project is not located on or near an adopted emergency response or evacuation plan. Due to the Project Site's location at the terminus of Casitas Avenue, development of the Project Site would not require temporary and/or partial street closures due to construction activities. Furthermore, the proposed Project contractor would implement a Construction Traffic Control/Management Plan to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project (TRANS-PDF-1). Additionally, TRANS-PDF-2 and TRANS-PDF-4 propose additional construction control measures to further minimize the Project's potential for construction impacts. As such, the proposed Project's construction activities would not substantially interfere with emergency response or evacuation plans. The proposed Project would cause a less than significant impact to emergency access during the Project's construction phase.

*(ii) Operation*

The proposed Project would be required to satisfy the emergency response requirements of the LAFD as noted in their response letter to the NOP. Additionally, there are no hazardous design features included in the proposed vehicular design or site plan for the proposed Project that could impede emergency access. Furthermore, the proposed Project would be subject to the site plan review requirements of the LAFD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. An alternative emergency access route to the Project Site would be provided via one of three potential access plans: (1) creating a new emergency access easement from the Glendale Freeway eastbound on ramp at Fletcher Drive, (2) utilization of the LADWP access road on the east bank of the LA River, or (3) ensuring an unobstructed access route through the State Park land to the south of the Project Site. As a condition of Project approval, the proposed Project will need to provide one of these three alternative emergency access routes and obtain necessary approvals from the agencies with jurisdiction. Therefore, the proposed Project would not be expected to result in inadequate emergency access, and a less than significant impact would occur during the proposed Project's operation.

## (12) Biological Resources

*(a) Habitat Modifications*

Based on a general biological site reconnaissance conducted in June 2017 for the proposed Project, no special-status species or habitats (e.g., roosting habitat for bats or

native birds) occur or have potential to occur on the Project Site. While two special-status species were observed off-site adjacent to the Project Site (Southern California black walnut [CNPR 4.2] and yellow warbler [Federal Bird of Conservation Concern and State Species of Special Concern]), neither would be impacted by the proposed Project, and, therefore, there would be a less than significant impact on these species associated with the proposed Project. Furthermore, the Biological Resources Technical Memorandum also notes the presence of potential habitat (albeit low potential) for the two-striped garter snake and western pond turtle within the Los Angeles River. Currently, the low-flow channel is located on the south side of the Los Angeles River such that potentially suitable habitat for these species ranges from 315 to 375 feet from the Project Site and is separated by unsuitable upland areas, including a 75-foot-wide concrete slope. Due to this separation of potential habitat from the Project Site, there is no potential for impacts to these species as a result of Project construction or operation. As such, the proposed Project would result in a less-than-significant impact upon the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected or candidate species or a Species of Special Concern or federally listed critical habitat.

*(b) Riparian Habitat and Sensitive Natural Communities*

No riparian habitat or other sensitive natural communities exist on the Project Site; therefore, the proposed Project would not result in the alteration of an existing wetland habitat. While the Project Site is adjacent to the Los Angeles River, which supports limited areas of native riparian habitat, Project construction or operation would not impact any areas of riparian habitat either directly through grading or indirectly through light or noise as the areas of riparian habitat are approximately 250 to 275 feet from the Project Site. A Storm Water Pollution Prevention Plan (SWPPP) and LID Plan would be prepared and implemented to ensure that the potential for soil erosion, sedimentation, and surface water runoff is minimized. The proposed Project would result in a less-than-significant impact related to loss of any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. Furthermore, as noted in BIO-PDF-3, the proposed landscaping palate shall consist of native plant species consistent with the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Therefore, a less than significant impact would occur to locally-designated species, habitats, or plant communities associated with the proposed Project.

*(c) Protected Wetlands*

No wetland habitats occur onsite; therefore, the proposed Project will not result in the alteration of an existing wetland habitat. The proposed Project would not impact the Los Angeles River, which exhibits aquatic habitats; therefore, the proposed Project would

not result in significant impacts on wetlands or other aquatic resources. As noted above, there is an approximately 155-foot setback from the areas with natural substrate and vegetation within the river including a 75-foot wide concrete slope.

*(d) Native Residents or Migratory Fish or Wildlife Species*

No wildlife movement/migration corridors occur onsite; therefore, the proposed Project will not result in the interference with wildlife movement/migration corridors. The Los Angeles River has the potential and presumably serves as a movement corridor for a variety of species; however, the proposed Project would not affect the Los Angeles River and is sufficiently setback from the natural vegetation and substrate within the river such that there would be no potential for significant impacts on wildlife movement associated with the proposed Project. Specifically, the distance from the Project Site boundary to the vegetated portion of the Los Angeles River is approximately 155 feet including a 75-foot wide concrete slope that comprises the northern bank of the river. As such, the proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and a less than significant impact would occur.

*(e) Consistency with Biological Resources Ordinances and Policies*

There are no protected tree species located on the Project Site. Additionally, there are no street trees under the control of the Urban Forestry Department that would be impacted by the proposed Project. Therefore, the proposed Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance or require any street tree removal permits from the City of Los Angeles Urban Forestry Division. However, it is anticipated that all 55 non-protected trees on-site would be removed during the construction of the proposed Project. Project Design Feature BIO-PDF-1 requires the proposed Project to replace all significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project Site proposed for removal with a 1:1 ratio. Project Design Feature BIO-PDF-2 requires a qualified biologist monitor to review landscaping and irrigation systems that are adjacent to the replacement trees to determine whether such landscaping and irrigation systems are compatible for the survival of the replacement trees. As there are no protected tree species located on the Project Site, the proposed Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant.

*(f) Consistency with Adopted Habitat Conservation Plans*

The Project Site is not located in or adjacent to an existing or proposed Significant Ecological Area. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. As previously discussed, the Project Site is located within the RIO District and is located north of the Los Angeles River. The development of the proposed Project would comply with the development standards and guidelines for development within the RIO district. Accordingly, certain development standards imposed by the RIO District Ordinance would promote conservation efforts and minimize impacts upon plant and wildlife within the Los Angeles River corridor. Compliance with these design standards would further reduce the proposed Project's less than significant impacts upon biological resources. As such, the proposed Project would not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, a less-than-significant impact would occur with the development of the proposed Project.

## (13) Tribal Cultural Resources

The results of the records search at the SCCIC indicate that 14 cultural resource studies have previously been conducted within 0.5 mile (0.8 km) of the Project Site, none of which included the Project Site directly. No known tribal cultural resources were identified in the CHRIS records search. Considering the information available on Native American settlement patterns for the Glendale Narrows, historical disturbances, and soil data for the Project Site, the Project Site was found to have a low sensitivity for containing unidentified tribal cultural resources.

In response to the AB 52 Consultation request, the City of Los Angeles Department of City Planning received one response letter from the Gabrieleño Band of Mission Indians. Citing the fact that the Project Site lies in a broad area where the ancestral territories of the Kizh (Kitc) Gabrieleño's villages adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods, the Gabrieleño Band of Mission Indians requested that one of their certified Native American Monitors conduct a 1-day on-site spot monitoring survey during the earthwork phase to verify the presence or absence of any cultural resources, which may be affected during construction or development. This request was verbally agreed to by Department of City Planning staff and has been incorporated into the proposed Project as Project Design Feature TCR-PDF-1. No further evidence was provided to indicate the presence of any known cultural sites or resources within the Project Site or immediate Project area. With incorporation of TCR-PDF-1 and compliance with applicable California regulations with

regards to human remains, the proposed Project would have a less-than-significant impact upon California Native American tribal cultural resources.

## (14) Energy Conservation

### *(a) Electricity*

#### *(i) Electricity Demand*

The estimated net increase in electricity consumption by the proposed Project would be approximately 1,337,720 kWh/year. With a modern building design, and pre-installed energy-efficient fixtures and appliances, the proposed Project would promote energy conservation in accordance with the policies identified in Title 24 and in the Los Angeles Green Building Code. While impacts upon regional energy resources are expected to be less than significant, implementation of regulatory compliance measures that meet Title 24 and the L.A. Green Building Code energy efficiency requirements would further reduce demand for electricity. Additionally, the proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate-controlled urban greenhouse. Therefore, the proposed Project would not cause wasteful, inefficient, and unnecessary consumption of electricity during construction or operation, and impacts with respect to electricity demand would be less than significant.

#### *(ii) Electricity Supply and Infrastructure*

The proposed Project may require power line extensions to the Project Site and house electricity infrastructure (e.g. pads) on site, which would be typical of such construction projects and would follow all mandatory regulations in coordination with LADWP. New service connections may occasionally result in temporary disruptions in electrical services for existing customers. However, no outages or short outage is anticipated to occur when hooking up the proposed Project. The installation of new infrastructure would not be expected to result in any significant secondary environmental effects. Therefore, the proposed Project's impacts to existing electricity facilities would be less than significant.

Correspondence with LADWP states that electric service is available to serve the proposed Project and would be provided in accordance with LADWP's Rules Governing Water and Electric Service. As future projected electricity supplies from LADWP are adequate to serve the proposed Project, the proposed Project impacts on local and regional electricity supplies during construction and operation would be less than significant.

*(b) Natural Gas*

*(i) Natural Gas Demand*

The proposed Project's net natural gas demands are estimated to be approximately 3,372,230 kBTU/year, or approximately 275,509 cf/month. The proposed Project would promote energy conservation in accordance with the policies identified in Title 24 and the L.A. Green Building Code, which sets compliance measures to promote energy conservation efforts. Additionally, as discussed above, the proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate- controlled urban greenhouse. The use of natural gas-fueled fireplaces within the residential units would also be prohibited. As such, the proposed Project would not consume or demand an excessive amount of natural gas. Therefore, the proposed Project would not cause wasteful, inefficient, and unnecessary consumption of natural gas during operation, and impacts with respect to natural gas demand would be less than significant.

*(ii) Natural Gas Supply and Infrastructure*

It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the proposed Project. The proposed Project would however, require local infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts associated with utility upgrades or additional connections would be temporary in nature and would not require new supply facilities. The operation of the proposed Project would not result in the increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities. Therefore, the proposed Project would result in a less than significant impact to natural gas infrastructure capacity.

Southern California Gas (SoCalGas) has a combined theoretical storage working inventory capacity of 112.5 billion cf allocated to residential, small industrial, and commercial customers. The proposed Project's natural gas consumption of 3.3 million cubic feet per year would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity and, therefore, would be well within the SoCalGas's existing natural gas storage capacity of 112.5 billion cubic feet as of 2018. Therefore, the proposed Project's impacts on local and regional natural gas supplies during both construction and operation would be less than significant.

*(c) Transportation Energy*

*(i) Transportation Energy Demand*

The proposed Project would result in a net demand for 283,101 gallons of gasoline and 75,211 gallons of diesel fuel on an annual basis during the life of the proposed Project for transportation related fuels. The proposed Project would promote trip reductions and alternative modes of transportation. The proposed Project's mix of residential, office, and commercial space, proximity to transit, and location near a broad mix of existing land uses results in a net reduction of daily trip ends as a result of internal trip capture and transit adjustments. Additionally, the proposed Project would provide bicycle parking spaces to encourage residents, patrons, and employees to utilize alternate modes of transportation, such as walking, biking, and public transportation. As such, the proposed Project would promote alternate modes of transportation and reduce its reliance on transportation energy. Therefore, the proposed Project would not cause wasteful, inefficient, and unnecessary consumption of transportation energy during construction and operation, and impacts with respect to transportation energy demand would be less than significant.

*(ii) Transportation Energy Resources*

In 2017, approximately 624,984 thousand barrels of crude oil (approximately 26.2 billion gallons) were supplied to California refineries. Assuming the same supply of crude oil is provided to California in 2022 (buildout year of proposed Project), the proposed Project's estimated consumption of 283,101 gallons of gasoline per year and 75,211 gallons of diesel fuel per year would be a small fraction of one percent of available oil. As such, the gasoline consumption associated with the proposed Project's vehicle trips during both construction and operation would be a negligible amount of oil compared to the total amount of oil supplied to California, and impacts on regional and local supplies would be less than significant.

*(d) Consistency with Applicable Plans and Policies*

*(i) Construction*

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment. During construction, trucks and equipment operated on-site would comply with SCAQMD's anti-idling regulations and CARB's In-Use Off-Road Diesel-Fueled

Fleets regulation. Compliance with the anti-idling and diesel-fueled fleet regulations would directly reduce the amount of diesel fuel consumed during the construction phase. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards, as required. Therefore, the proposed Project's construction activities would comply with existing energy standards, and impacts would be less than significant.

*(ii) Operation*

The proposed Project would be required to comply with 2016 Title 24 requirements, 2016 CalGreen requirements, and the L.A. Green Building Code. Therefore, the proposed Project would comply with energy conservation standards with respect to electricity and natural gas usage. With respect to transportation energy, the vehicles traveling to and from the Project Site are assumed to comply with CAFE standards and CARB's Advanced Clean Cars Program. Therefore, the proposed Project would comply with all existing construction and operational energy standards that are applicable to the proposed Project, and impacts would be less than significant.

## b) Less Than Significant with Mitigation

### (1) Cultural Resources

*(a) Archaeological Resources*

There are no known archaeological resources on the Project Site or within a ½-mile radius of the Project Site. However, the SCCIC recommends that, due to the Project Site's proximity to the Los Angeles River and the Project Site's location and historical association with railroad activity, the Project Site be considered potentially sensitive for cultural resources. Construction of the proposed Project would entail the demolition of the existing structures and excavation up to approximately 15 feet for required earthwork removals. Within the limits of the previously placed primary structural fill, removals would be a minimum of two feet below existing grade/bottom of existing slab. In addition, previously placed undocumented fills and loose/compressed native soils would be removed and replaced as properly compacted fills. Excavation into the native soil below the documented fill material is not anticipated, except in limited areas.

Mitigation measures would be implemented to ensure that the proposed Project would have a less than significant impact with respect to archaeological resources in the unlikely event that archaeological resources are discovered during excavation, grading, or construction activities. Based on the lack of archaeological resources being discovered prior to the existing development and the absence of any known

archaeological resources, and the incorporation of Mitigation Measures CUL-MM-1, CUL-MM-2 and CUL-MM-3, which would address the unlikely discovery of archaeological materials, the proposed Project would result in a less than significant impact upon a known archaeological resource.

## c) Significant and Unavoidable

### (1) Noise

#### *(a) Roadway Noise*

The proposed Project would generate an increase in vehicle trips to and from the Project Site, which would increase roadway traffic noise on the surrounding roadways. The proposed Project is anticipated to generate a total of 2,551 daily vehicle trips, including 199 AM peak hour trips and 239 PM peak hour trips. The proposed Project's roadway noise impacts were calculated at 18 street segments in the Project vicinity for two scenarios: "Existing with Project" and "Future with Project" scenarios. The proposed Project would result in a less-than-significant roadway noise impact at 16 of the 18 street segments analyzed. Two of the local streets would, however, experience roadway noise level impacts that exceed the ambient predicted noise level by more than 5 dBA CNEL and, thus, would be considered a significant impact. Larga Avenue (between Fletcher Drive and Carillon Street) would experience an approximate 5.7-dBA CNEL increase, which is 0.7 dBA CNEL above the threshold. La Clede Avenue (between Fletcher Drive and Carillon Street) would experience an approximate 7.2-dBA CNEL increase, which is 2.2 dBA CNEL above the threshold. Additionally, these roadways are fronted by single-family homes, which are considered noise-sensitive land uses. As such, the proposed Project's roadway noise impacts at the Larga Avenue and La Clede Avenue street segments would be considered significant.

No feasible mitigation measures have been identified to effectively mitigate the significant operational roadway noise impacts that are projected to occur. Measures, such as speed humps, curb extensions, and bulbouts, could be employed to slow down traffic. However, they would be unlikely to divert any traffic. Speed humps would also have the undesirable effect on increasing noise on local streets. As such, these measures would be ineffective in addressing the proposed Project's roadway noise impacts and are not recommended. As discussed above, proposed Project impacts related to local roadway noise would be significant and unavoidable.

### (2) Traffic/Transportation

#### *(a) Consistency with CEQA Guidelines Section 15064.3 subdivision (b)*

The proposed Project is expected to generate a net increase of 2,539 daily trips based on the VMT Calculator tool methodology. The VMT results show that with the proposed Project, the Household VMT per Capita would be 12.7 compared to the threshold of 7.2, and the Work VMT per Capita would be 14.9 compared to the threshold of 12.7. Therefore, the proposed Project would cause significant VMT impacts for both Household VMT and Work VMT.

Consistent with City policies on sustainability and smart growth and with DOT's trip reduction and multi-modal transportation goals, the proposed Project's mitigation program first focuses on developing a trip reduction program and on solutions that promote other modes of travel. To off-set the expected significant impacts identified in the proposed Project's VMT analysis, DOT recommends that the applicant be required to implement Transportation Demand Management (TDM) strategies as mitigation (Mitigation Measures TRANS-MM-1 to TRANS-MM-5).

The proposed project's VMT impacts were evaluated with and without Mitigation Measures TRANS-MM-1 to TRANS-MM-5. The "VMT with mitigation" analysis shows with the proposed Project with mitigation scenario, the Household VMT per Capita would be 10.5 compared to the threshold of 7.2, and the Work VMT per Capita would be 14.2 compared to the threshold of 12.7. As such, the proposed Project's VMT impacts per household and per capita would remain significant and unavoidable after mitigation.

# 11. Project Design Features

The following project design features are applicable to the Project:

## a) Aesthetics

**Project Design Feature AES-PDF-1:** Temporary construction fencing will be installed around the perimeter of the Project Site prior to demolition work to secure the site and block unsightly views of construction debris and equipment. The Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period. Site maintenance and graffiti removal shall comply with LAMC Sections 91.3306, 91.3307, and 91.8104.15 of

the LAMC.

**Project Design Feature AES-PDF-2:** The proposed Project shall include low-level directional lighting at the ground and podium levels of the exterior of the proposed structures to reduce light spillover onto adjacent properties.

**Project Design Feature AES-PDF-3:** The proposed Project's façades and windows shall be constructed of non-reflective materials (e.g., minimize the use of glass with mirror coatings) such that glare impacts on surrounding properties and roadways are minimized. Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

**Project Design Feature AES-PDF-4:** On-site utilities that serve the proposed Project shall be installed underground, as recommended by the Los Angeles Department of Building and Safety and the Los Angeles Department of Water and Power.

**Project Design Feature AES-PDF-5:** Mechanical, electrical, roof-top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), and trash enclosures, will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way.

## b) Air Quality

**Project Design Feature AQ-PDF-1** No wood burning or natural gas fireplaces shall be provided in the residential units.

## c) Greenhouse Gas Emissions

**Project Design Feature GHG-PDF-1**: The proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate-controlled urban greenhouse.

**Project Design Feature GHG-PDF-2**: The proposed Project will prohibit the use of natural gas-fueled fireplaces within the residential dwelling units.

## d) Hazardous Materials / Risk of Upset

**Project Design Feature HAZ-PDF-1:** A Soil Management Plan (SMP) will be prepared to address potential hazardous substances and/or petroleum products that may be discovered during site development. Observations should be made during construction for areas of possible contamination such as, but

not limited to, the presence of underground facilities, buried debris, waste drums, and USTs, stained soil or odorous soils. The SMP will be implemented to meet the performance standards of the Department of Toxic Substances Control, Regional Water Quality Control Board, City of Los Angeles Department of Building and Safety, and LAFD for residential development and provide a framework under which work can proceed safely, and to ensure hazardous materials are properly handled, segregated, stockpiled, and disposed of at a licensed disposal facility.

## e) Noise

**Project Design Feature NOI-PDF-1**: Construction and demolition will be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday or national holidays.

**Project Design Feature NOI-PDF-2**: Project construction will not include the use of impact driven pile systems (i.e., pile drivers).

**Project Design Feature NOI-PDF-3**: All building outdoor mounted mechanical, heating ventilation and air conditioning (HVAC), and electrical equipment will be designed to comply with LAMC noise regulations to prohibit noise from any stationary mechanical systems from exceeding the ambient noise levels at the property line by more than 5 dBA $L_{eq}$.

**Project Design Feature NOI-PDF-4**: Outdoor amplified sound systems (e.g., speaker and stereo systems, or other sound producing devices) will be designed so as not to exceed 5 dBA (hourly $L_{eq}$) above ambient noise levels at any residential off-site receptor.

**Project Design Feature NOI-PDF-5**: The perimeter of the outdoor restaurant seating areas will be designed with a five-foot high glass, plexiglass, or other solid barrier to confine noise within the outdoor seating area.

## f) Public Services - Police

**Project Design Feature POL-PDF-1:** During construction, the Project applicant will implement appropriate temporary security measures, including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided on a weekly basis. During construction activities, the Contractor will document

the security measures; and the documentation will be made available to the Construction Monitor).

**Project Design Feature POL-PDF-2:** Prior to the issuance of a certificate of occupancy, the Project Applicant will submit a diagram of the Project Site to the LAPD Northeast Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

**Project Design Feature POL-PDF-3:** The Project will include nighttime security lighting of building entries and walkways, private on-site security, a closed circuit security camera system monitored by on-site professional security, and secure parking facilities with sufficient lighting to maximize visibility and reduce areas of concealment.

## g) Traffic/Transportation

**Project Design Feature TRANS-PDF-1:** The Applicant shall, prior to construction, develop a Construction Traffic Control/Management Plan (the "Plan") to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties.

**Project Design Feature TRANS-PDF-2:** All construction related traffic shall be restricted to off-peak hours.

**Project Design Feature TRANS-PDF-3:** The Applicant shall install informational traffic signs within the Project Site in accordance with the applicable provisions of LAMC Section 14.4 to ensure pedestrian and vehicular safety during project operations.

**Project Design Feature TRANS-PDF-4:** The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases except when it is absolutely required to close or block sidewalks for construction staging. Sidewalks shall be reopened as soon as reasonably feasible taking construction and construction staging into account. This requires the Applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Temporary pedestrian facilities shall be

adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

## h) Biological Resources

**Project Design Feature BIO-PDF-1**: Prior to issuance of a building permit, the Project Applicant shall coordinate with the City and replace any non-protected significant trees that are 8 inches or more in diameter at breast height (dbh), that would be removed during the Project construction period, at a 1:1 ratio with a minimum 24-inch box tree. Replacement trees shall be planted on-site.

**Project Design Feature BIO-PDF-2**: A qualified biologist monitor shall review landscaping and irrigation systems that are adjacent to the replacement trees to determine whether such landscaping and irrigation systems are compatible for the survival of the replacement trees. All newly planted trees within the Project Site must be appropriately sized, stalked, and tied, provided with a watering moat and shall be properly watered and maintained.

**Project Design Feature BIO-PDF-3**: The proposed landscape palate shall consist of native plant species as identified in the Los Angeles County, Department of Public Works, Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes, January 2004.

**Project Design Feature BIO-PDF-4**: To ensure compliance with the MBTA and avoid potential impacts to nesting avifauna, vegetation on the Project Site will be removed outside the avian breeding season (March 15 to August 31). If vegetation removal occurs during this period, a biologist experienced in performing nesting bird surveys will survey shrubs and trees to be removed not more than three days prior to removal. If active nests are identified, shrubs or trees with active nests will not be removed until the biologist has confirms that the nest is no longer active and that the fledglings are no longer dependent on the nest.

## i) Tribal Cultural Resources

**Project Design Feature TCR-PDF-1** Pursuant to the verbal agreement reached during the AB 52 consultation process between the Department of City Planning and the Gabrieleño Band of Mission Indians, a Native American

Monitor from the Gabrieleño Band of Mission Indians shall conduct a one-day spot check survey during the grading and earthwork phase.

# 12. Mitigation Measures

The following mitigation measures are applicable to the proposed Project:

## a) Traffic/Transportation

**TRANS MM-1** A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. As recommended by the traffic impact study, the TDM program shall include, but is not limited to, the following:

- Unbundled Parking: Unbundling and lease of parking spaces for residents;
- TDM Promotions and Marketing:
    - Provision of an on-site transportation coordinator to promote the TDM program and alternatives to the car and facilitate rideshare;
    - Implementation of vehicle trip reduction incentives and services for Project employees and/or tenants; provide on-site education on alternative transportation modes;
    - Provide all new employees with a Transit Welcome Package which could include information on area bus/rail transit route and connections/transfers information, bicycle facilities, and convenient local services and restaurant within walking distance of the project;
- Shared Mobility:
    - Provision of five car-share spaces and a ten-space bike-share;
    - Provision of a carpool program for employees;
    - Preferential rideshare parking location;

- Bicycle Infrastructure:
    - Provide secure bike parking and showers for employees to promote bicycling and walking;
    - Convenient parking and facilities for all bicycle riders;
    - Contribute a one-time fixed fee contribution of $50,000 to be deposited into the City's Bicycle Plan Trust fund to implement bicycle improvements in the vicinity of the project.
- Neighborhood Enhancement: The project shall ensure a substantive commitment to providing pedestrian network improvements within the project and to off-site connections. This would include connections to off-site areas including the L.A. River Bike Path and the planned public park to the south of the Project Site. The proposed Project shall also incorporate traffic calming measures identified in the traffic study for the neighborhood streets and intersections to the north of the Project Site and south of Fletcher Drive.

  The traffic study identified the following three neighborhood streets as locations that can potentially experience an increase in vehicle traffic due to project related trips:

  1. Carillon Street – between Casitas Avenue and La Clede Avenue
  2. La Clede Avenue – between Carillon Street and Fletcher Drive
  3. Larga Avenue – between Carillon Street and Fletcher Drive

  In order to address these potential impacts, the applicant shall fund implementation of a Neighborhood Traffic Management Program (NTMP). The Program shall be developed in cooperation with DOT, Council District 1 staff and affected neighborhood residents. The Program shall include an implementation plan that sets key milestones and identifies a proposed process in developing a NTM plan for the three locations. Typical NTM measures include, but are not limited to, traffic circles, speed humps, roadway narrowing effects (raised medians, traffic chokers, etc.), landscaping features, roadway striping changes, and stop sign pattern.

  The NTMP should be formalized through an agreement between the applicant and DOT prior to the issuance of the first building permit for this project. The agreement should include a funding guarantee and

outreach process, selection and approval criteria for any evaluated NTM measures and an implementation phasing plan. The agreement shall also guarantee funding for constructing approved NTM measures, up to $100,000. The final implementation plan, if consensus is reached among the stakeholders, would be subject to review and approval by DOT's Central District Office and it would be the Applicant's responsibility to implement any approved NTM measures through the Bureau of Engineering's B-permit process.

## b) Cultural Resources

**CUL-MM-1** In the unlikely event that archaeological resources are encountered during the construction phase, all further ground-disturbing activities in the area of the find shall be halted and:

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;
- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
- The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.

**CUL-MM-2** Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

SCCIC Department of Anthropology
McCarthy Hall 477
CSU Fullerton
800 North State College Boulevard Fullerton, CA 92834

**CUL-MM-3** Prior to the issuance of any building permit, the Applicant shall:

- Submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the Applicant to this condition shall be recorded prior to the issuance of a grading permit.

# 13. Summary of Alternatives

This Draft EIR examines five alternatives to the proposed Project in detail, which includes: the No Project Alternative, the Reduced Density Alternative, the Commercial Office Alternative, the Residential Alternative, and the Mixed-Use Podium Alternative. Descriptions of these alternatives are provided below. More detailed descriptions of these alternatives and a comparative analysis of the environmental impacts of these alternatives relative to the proposed Project are provided in Section V. Project Alternatives to this Draft EIR.

## a) No Project Alternative

The No Project Alternative is the circumstance under which the proposed Project does not proceed. CEQA Guidelines (Section 15126.6(e)) provides that the "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what can reasonably be expected to occur in the foreseeable future if the proposed Project is not approved based on current plans and consistent with available infrastructure and community services. In February 2017, at the time the NOP was published for the proposed Project, the Project Site was developed with a 117,000 square-foot light manufacturing building including 87,000 square feet of manufacturing space, 25,000 square feet of warehouse space, and 5,000 square feet of production space.

Under the No Project Alternative, no buildings would be demolished and no new buildings would be constructed. Building repair and upgrades would be necessary for the commercial uses to remain occupied and viable. While it may be possible for commercial vacancies to fluctuate over time, the No Project Alternative assumes that the leasable area in the existing structure would remain similar to current conditions. As such, the Project Site's active land uses would include approximately 117,000 square feet of manufacturing, warehousing, and production space.

## b) Reduced Density Alternative

The Reduced Density Alternative is essentially a scaled down version of the proposed Project with a base FAR of 1.5:1 (as permitted by code), without the requested 35% increase in density for the provision of affordable housing on-site. Similar to the proposed Project, the Reduced Density Alternative would include the demolition of the existing 117,000 square-foot manufacturing/warehouse/production building and the construction of a mixed-use development with residential, office, restaurants, and an urban farm.

Pursuant to LAMC Section 12.17.1.A.1, residential land uses are permitted in a CM Zone with compliance to the density regulations of the R3 Zone. As such, residential uses on the Project Site would be limited to one dwelling unit per 800 square feet (or approximately 310 dwelling units for the Project Site based on a lot area of 248,190 square feet). The Reduced Density Alternative would therefore provide a total of 310 multi-family residential units (approximately 308,285 square feet) and approximately 64,000 square feet of commercial space. The commercial space would be the same as proposed under the proposed Project and would include a mix of restaurant uses, office space, and an urban farm. A six-story parking garage (Building G), adjacent to Building A, would provide up to 562 parking spaces for the Project Site. The Reduced Density Alternative would be required to provide 190 bicycle spaces, which includes 162 long-term bicycle spaces and 28 short-term bicycle spaces. As compared to the proposed Project, the Reduced Density Alternative Parking garage would be six stories instead of seven. The parking spaces would be provided in levels one through five, and an urban farm is proposed on the roof (sixth) level. In addition, open space and recreational amenities would comprise approximately 32,500 square feet in accordance with the LAMC requirements.

### c) Commercial Office Alternative

The Project Site has a current land use designation of Heavy Manufacturing and is currently zoned as [Q]PF-1-CDO-RIO. In 2010, the City inadvertently rezoned the Project Site from M2-1 to its current zoning, which is not consistent with the site's land use designation under the adopted Community Plan. The "PF" zoning is associated with a land use designation of Public Facilities, which allows for the development of agricultural uses, parking under freeways, fire and police stations, government buildings, public libraries, post offices, public health facilities, and public elementary and secondary schools. Because the Project Site is not owned by a governmental agency and the PF zone is inconsistent with the Heavy Manufacturing land use designation, it would not be reasonable or appropriate to analyze the buildout of the site under the PF zone. Thus, for these reasons, the Commercial Office Alternative evaluates the potential environmental impacts of the redevelopment of the site under the M3-1-CDO-RIO zone, which is consistent with the underlying "Heavy Manufacturing" General Plan land use designation and existing land uses that occur on site. The Commercial Office Alternative would include 372,285 square feet of floor area. The "CDO" designation that indicates that the Project Site is located within the Cypress Park and Glassell Park CDO District, and the "RIO" designation, which indicates that the Project Site is located within the River Improvement Overlay District, would also apply under this alternative.

The M3 (Heavy Industrial Zone), corresponds to the current Heavy Manufacturing General Plan land use designation and generally allows for all land uses permitted

under less restrictive M zones (including commercial office uses), with exceptions (i.e., dwelling units and/or guest rooms are not allowed the M zones). Under the M3-1 zone the maximum allowable floor area potential for the Project Site is 372,285 square feet. For purposes of addressing the potential environmental impacts of an alternative project that is consistent with this zone designation, this alternative contemplates an alternative that consists of commercial office land uses with a 1.5:1 floor are a ratio (FAR). Office uses were the selected land use as the office use is allowed under the M3 zone and would afford a greater financial return as compared to manufacturing uses (which is reflective of the underutilization of the existing industrial/warehouse/production land uses). Office uses were also determined to be more compatible with proximity to nearby residences, schools, and public open spaces than heavy manufacturing/industrial land uses. Further, an office project would create more jobs on-site than heavy industrial uses.

### d) Residential Alternative

The Residential Alternative is essentially a scaled down version of the proposed Project without the 64,000 square feet of commercial space. Similar to the proposed Project, the Residential Alternative would include the demolition of the existing 117,000 square-foot warehouse/production building and the construction of a residential development 419 dwelling units. Similar to the proposed Project, this alternative would require a General Plan Amendment to change the land use designation from Heavy Manufacturing to Limited Industrial and a Vesting Zone Change from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO. Pursuant to LAMC Section 12.17.1.A.1, residential land uses are permitted in a CM Zone with compliance to the density regulations of the R3 Zone. As such, residential uses on the Project Site would be limited to one dwelling unit per 800 square feet (or approximately 310 dwelling units for the Project Site based on a lot area of 248,190 square feet). Similar to the proposed Project, the Residential Alternative would request a 35% increase in density for the provision of affordable housing on-site, and would therefore provide a total of 419 multi-family residential units, totaling approximately 423,872 square feet of floor area. Thirty-five (35) dwelling units would be restricted to Very-Low Income Units (i.e., 11 percent of the base density).

A five-story parking garage (Building G), adjacent to Building A, would provide up to 587 parking spaces for the Project Site. As compared to the proposed Project, the Residential Alternative parking garage would be six stories instead of seven. In addition, open space and recreational amenities would comprise approximately 58,176 square feet.

## e) Mixed-Use Podium Alternative

The Mixed-Use Podium Alternative is a scaled down version of the proposed Project, except this alternative would be built without a detached parking structure and without the roof-top urban farm component. The Mixed-Use Podium Alternative would be constructed as one building (Building A) with residential and commercial office uses above ground floor parking and retail/restaurant uses with approximately 445,872 square feet of floor area. Parking would be provided on level one of the mixed-use building across the entire Project Site and would provide up to 720 vehicle parking spaces. Similar to the proposed Project, the Mixed-Use Podium Alternative would include the demolition of the existing 117,000 square-foot manufacturing/ warehouse/production building and the construction of a mixed-use development with residential, commercial office, and restaurants. Pursuant to LAMC Section 12.17.1.A.1, residential land uses are permitted in a CM Zone with compliance to the density regulations of the R3 Zone. The Mixed-Use Podium Alternative would still provide a total of 419 multi-family residential units and approximately 22,000 square feet of commercial space. The restaurant and office spaces would be the same size as proposed under the proposed Project. However, this alternative would not include the urban farm under the proposed Project. As compared to the proposed Project, the Mixed-Use Podium Alternative's multi-family building would be six stories instead of seven. In addition, open space and recreational amenities would comprise approximately 58,176 square feet.

## f) Environmentally Superior Alternative

Section 15126.6 of the State CEQA Guidelines requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. The No Project Alternative be considered the environmentally superior alternative. The No Project Alternative would eliminate the proposed Project's significant and unavoidable impacts related to two significantly impacted roadway street segments: Larga Avenue (between Fletcher Drive and Carillon Street) and La Clede Avenue (between Fletcher Drive and Carillon Street). The No Project Alternative would not achieve any of the Applicant's stated Project Objectives, as it would maintain the status quo.

However, as required by CEQA, when the No Project Alternative is shown to be environmentally superior over the proposed Project, a separate Environmentally Superior Project Alternative shall be identified among the alternatives analyzed within the EIR. Based on a review of the project alternatives identified in this EIR, none of the alternatives would be effective in eliminating the Project's significant and unavoidable

VMT or roadway noise impacts. While it is anticipated that none of the alternatives would reduce the significant and unavoidable impacts generated by the proposed Project, the Reduced Density Alternative would be effective in reducing vehicle trips that contribute to the traffic and roadway noise impacts. As compared to the proposed Project, the Reduced Density Alternative would generate fewer daily trips than the proposed Project (1,863 trips compared to the proposed Project's 2,551 trips), fewer AM peak hour trips than the proposed Project (146 trips compared to 199 trips), and fewer PM peak hour trips than the proposed Project (174 trips compared to 239 trips). While this reduction in trips would not likely eliminate or avoid the significant VMT impacts and roadway segment noise impacts, the reduction in trips would be advantageous from an environmental perspective. The reduction in trips would also serve to further reduce the proposed Project's less than significant impacts associated with air quality, and greenhouse gas emissions. For these reasons, the Reduced Density Alternative was identified as the Environmentally Superior Alternative.

# II. Project Description

## 1. Introduction

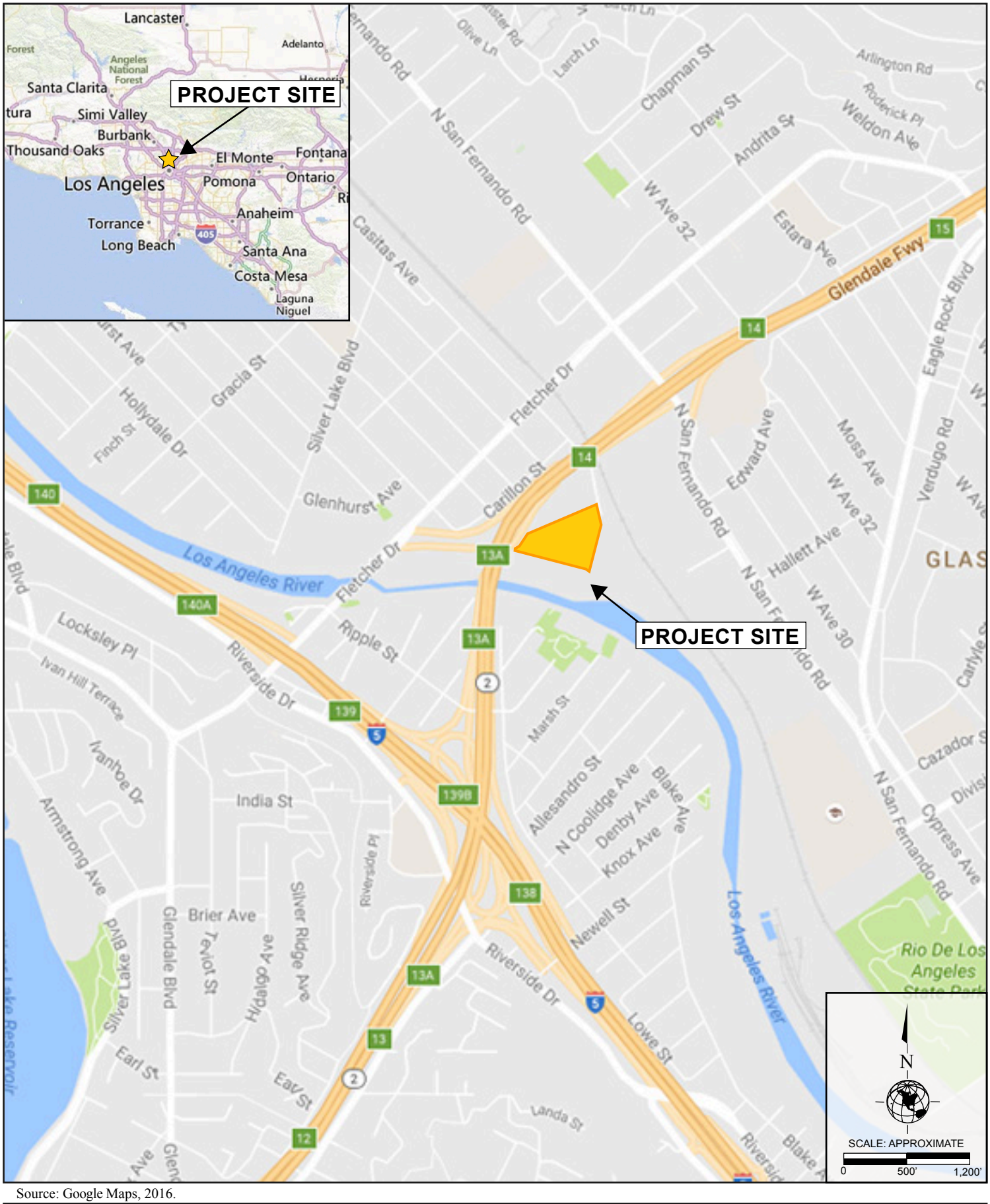
The purpose of this section is to define the characteristics of the 2800 Casitas Avenue Project (proposed Project), formerly referred to as the Bow Tie Yard Lofts Project. The Project would involve the demolition of an existing 117,000-square-foot warehouse/production building on the approximately 5.7-acre (248,190 square feet) Project Site. The Project would construct a new mixed-use development, consisting of five buildings with up to 419 multi-family residential units, up to 64,000 square feet of commercial space, and a multi-story parking structure. Commercial uses on-site would include a mix of restaurant uses, office space, and a rooftop urban farm/greenhouse. The Project's residential and commercial uses would comprise up to 487,872 square feet of total floor area.

This section includes the following information: (1) an overview of the Project location and setting, including a description of the existing zoning and land uses that occur on-site and in the immediate Project Site vicinity; (2) a statement of the Project's objectives; (3) a detailed description of the proposed Project, including the Project's residential and commercial land uses; the Project's building design; open space and recreational amenities; proposed signage and lighting features; access, circulation, and accessibility to public transportation; on-site parking; and floor area ratio (FAR) and building setbacks; (4) a discussion of the Project's construction activities and timeline; and (5) a list of discretionary actions required to implement the proposed Project.

## 2. Project Location and Setting

### a) Project Location

As shown in Figure II-1, Project Location Map on page II-2, the Project Site is located at 2750-2800 West Casitas Avenue, Los Angeles, California 90039 (Project Site). The Project Site includes one parcel (Assessor Parcel Number 5442-002-012) that totals approximately 248,190 square feet of gross lot area (5.7 acres). The Project Site is located within the boundaries of the Northeast Los Angeles Community Plan Area (CPA) in the City of Los Angeles, approximately four miles north of downtown Los Angeles. The Project Site is directly accessible from Casitas Avenue, which terminates at the Project Site.




Source: Google Maps, 2016.

Figure II-1
Project Location Map

As shown in Figure II-2, Aerial Photograph and Photograph Location Map, the Project Site is surrounded by commercial properties and public infrastructure improvements, including a freeway, a Metro-owned rail road right-of-way easement, a LADWP-owned transmission line easement, and the Los Angeles River Channel. The Glendale Freeway (SR-2) is located to the west of the Project Site. The Los Angeles River and transmission line easement are located to the south of the Project Site. A Metro-owned railway is located to the northeast of the Project Site. These three features limit access to the Project Site from the surrounding neighborhood and access to the Project Site is limited to Casitas Avenue. Photographs of the land uses immediately surrounding the Project Site are provided in Figure III-2, Photographs of Surrounding Land Uses (Views 7-12), in Section III, Environmental Setting.

The Project Site is immediately bordered by a self-storage facility to the north (refer to Figure III-2, View 8 and View 9, in Section III, Environmental Setting). Access to the self-storage facility and the Project Site is limited to Casitas Avenue. The Project Site and the self-storage facility are surrounded by open space (OS) and public facilities (PF) that characterize SR-2, the Los Angeles River, and the railway. SR-2 runs in a north-south direction in the vicinity of the Project Site and is located just northwest of the self-storage facility and the Project Site, where it curves around these properties, as shown in Figure II-2, Aerial Photograph and Photograph Location Map. SR-2 is located at a higher elevation than the Project Site and surrounding properties.

## b) Existing Conditions

As shown in Figure II-2, Aerial Photograph and Photograph Location Map, the Project Site is largely developed with a light manufacturing facility that is occupied by light manufacturing, warehouse, and film production uses (approximately 117,000 square feet) and a surface parking lot. Landscaping is located throughout the Project Site, specifically along the property perimeter and entrance and throughout the surface parking lot. One ingress/egress driveway from Casitas Avenue is provided for access to the Project Site. The Project Site is currently secured with walls and fencing along the perimeter and a gated driveway. The existing site conditions are depicted in Figure III-1, Photographs of the Project Site, Views 1 through 6, in Section III, Environmental Setting.

Sources: Parker Environmental Consultants, August 2016; and Google Earth, Aerial View, February 2016.

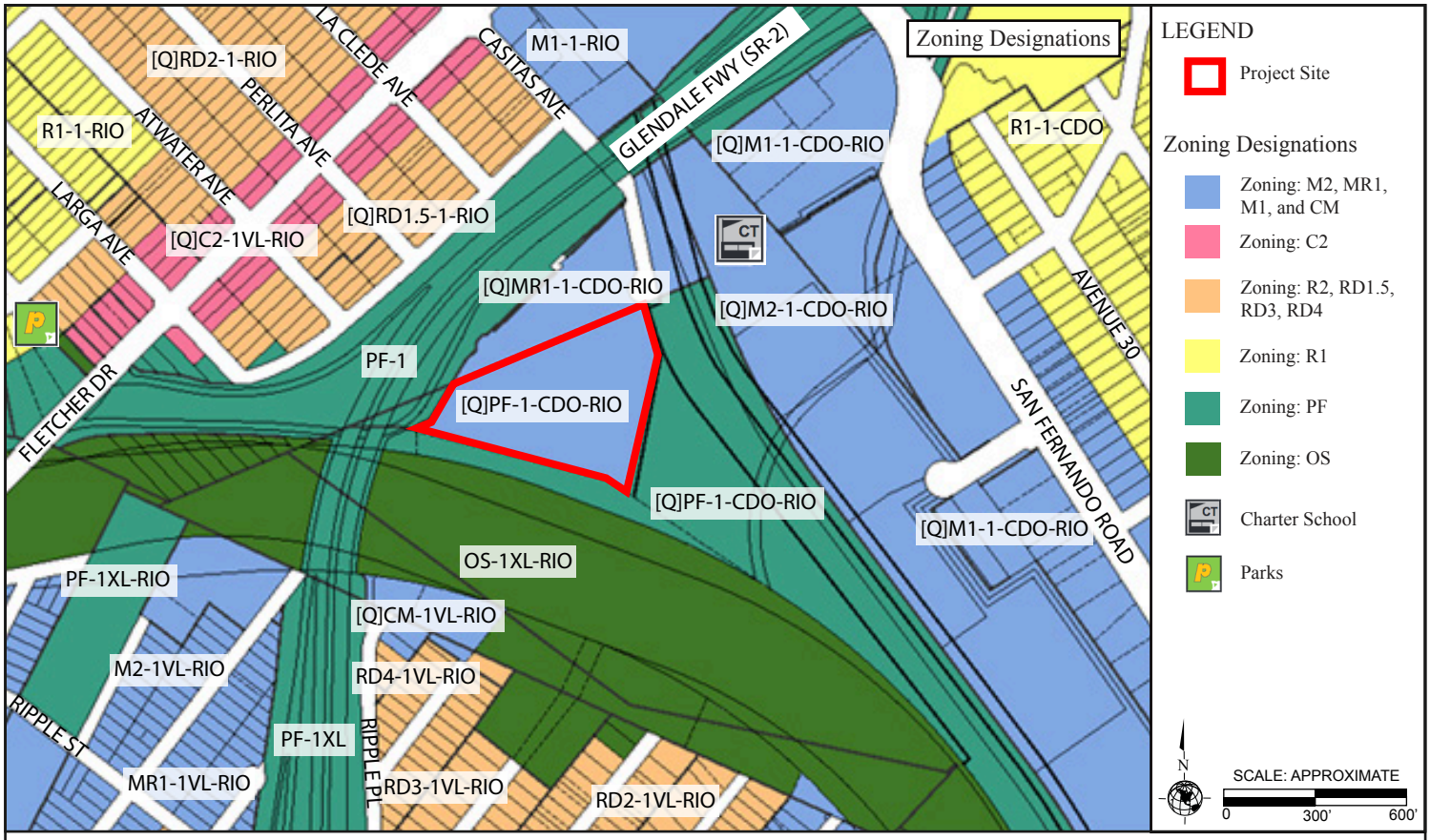
Figure II-2
Aerial Photograph and Photograph Location Map

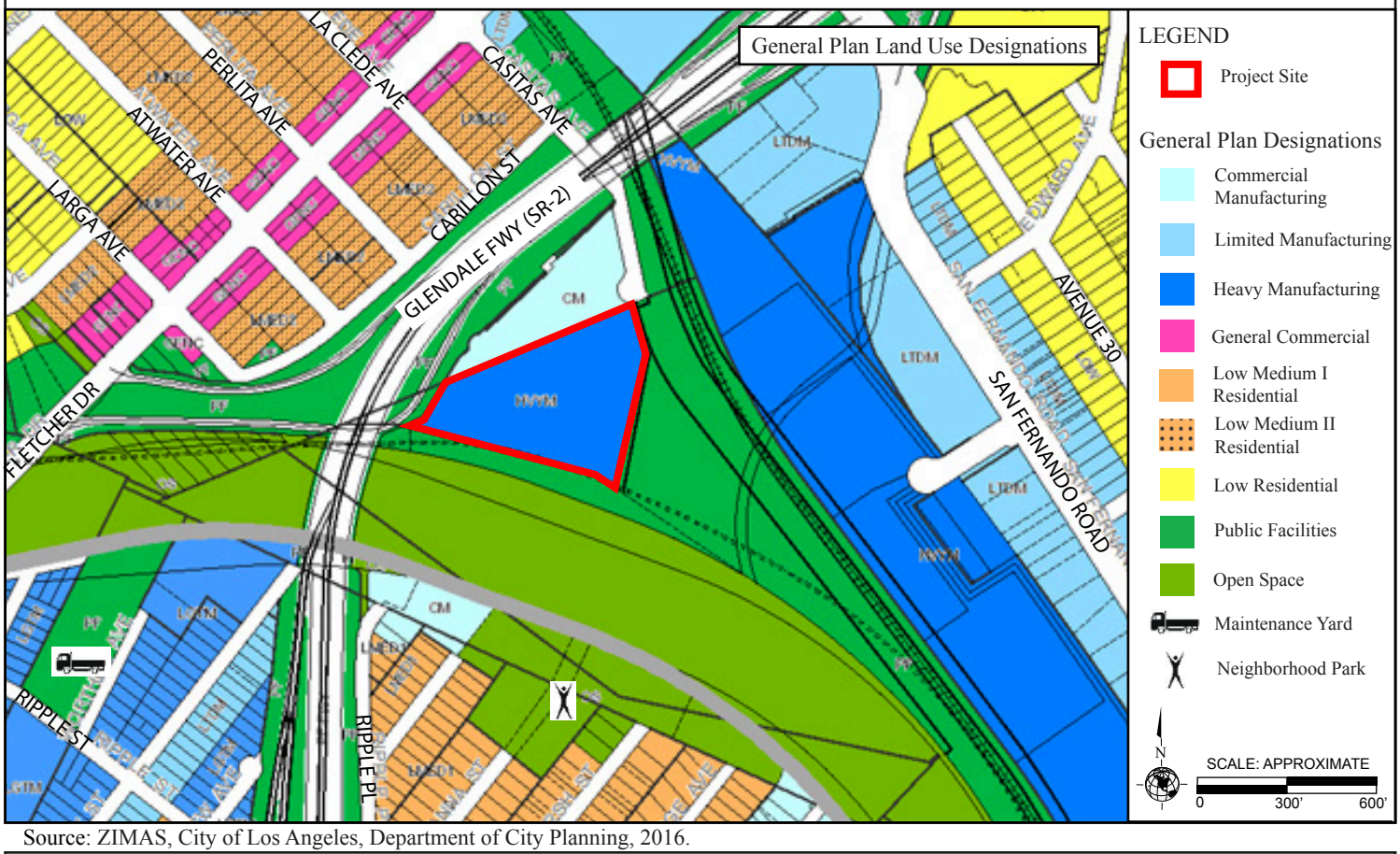
## c) Existing Land Use and Zoning

The Project Site consists of one parcel located within the Northeast Los Angeles Community Plan (Community Plan) area within the City of Los Angeles. The Project Site is further located within the Cypress Park and Glassell Park Community Design Overlay (CDO) District and the River Improvement Overlay (RIO) District. As shown in Figure II-3, Zoning and General Plan Land Use Designations, the Project Site has a land use designation of Heavy Manufacturing and is currently zoned as [Q]PF-1-CDO-RIO. In 2010, the City inadvertently rezoned the Project Site from M2-1 to its current zoning, which is not consistent with the Project Site's land use designation under the Community Plan. The "PF" zoning is associated with a land use designation of Public Facilities, which allows for the development of agricultural uses, parking under freeways, fire and police stations, government buildings, public libraries, post offices, public health facilities, and public elementary and secondary schools.

The Project Site is located within Height District No. 1, which allows a maximum FAR on the Project Site of 1.5:1. The CDO designation indicates that the Project Site is located within the Cypress Park and Glassell Park CDO District, which also sets a [Q] qualifying condition. The [Q] condition prohibits and/or limits various auto-related land uses within the Cypress Park & Glassell Park CDO. The RIO indicates that the Project Site is located within the RIO District. The CDO and RIO designations are further explained below. Additionally, the Project Site is located in the East Los Angeles State Enterprise Zone (ZI No. 2129) that regulates parking standards and height. The Metro Rail Project area (ZI No. 1117) is in effect for development within 100 feet of a Metro Rail construction area. In addition, Zone Consistency Review (ZI No. 2456) is in effect on the Project Site, as zoning for this property has recently been under review for consistency with the General Plan Land Use Designation.

The Project Site is within the jurisdiction of the Freeway Adjacent Advisory Notice for Sensitive Uses (ZI No. 2427). ZI No. 2427 requires that all new projects and expansions of existing developments involving sensitive uses within 1,000 feet of a freeway be notified of public health implications of freeway-adjacent projects. Sensitive receptors typically include residences, schools, playgrounds and childcare centers, long-term health care facilities, rehabilitation centers, adult day care/convalescent centers, hospitals, and retirement homes. The Project Site is located within 1,000 feet of SR-2, which is located to the north of the Project Site, and is, therefore, subject to the policies discussed in ZI No. 2427 (effective September 17, 2018). The Project's consistency with these land use policies is addressed in further detail in Section IV.F, Land Use and Planning.




Source: ZIMAS, City of Los Angeles, Department of City Planning, 2016.

Figure II-3
Zoning and General Plan Land Use Designations

# 3. Project Objectives

Section 15124(b) of the California Environmental Quality Act (CEQA) Guidelines states that the project description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the Project is to redevelop an underutilized property with a vibrant mixed-use project with residential, creative office, restaurants, and an urban farm. As set forth in the CEQA Guidelines, the objectives of the Project are as follows:

- Meet the Community Plan's objective to minimize incompatibilities between residential uses and commercial or industrial use.
    - Achieve greater land use compatibility by replacing existing light industrial uses with uses more compatible with nearby existing and proposed recreational, residential, and school uses, as well as the Los Angeles River.
    - Resolve the current inconsistency between the Project Site's [Q]PF-1-CDO-RIO zoning and its Heavy Manufacturing land use designation under the Community Plan.
- Promote the development of the RIO District by enhancing the visual appearance of and character of the Project Site with well-designed buildings and landscaping.
- Promote and support pedestrian activity along the Los Angeles River and enhance pedestrian access between the Los Angeles River and Casitas Avenue.
- Address the City's critical housing needs by providing a significant amount of housing, including Very Low Income housing units, in a range of housing types and sizes at a location that does not displace existing housing.
- Reduce vehicle trips and vehicle miles travelled.
    - Develop additional housing stock at an infill location that is close to commercial and recreational amenities, employment opportunities, and schools.
    - Provide a mixed-use project with on-site amenities.

  - Provide restaurant and similar amenities within walking distance of the residential neighborhoods on the other side of SR-2, future park users, and the Los Angeles River.

- Promote fiscal benefits to the City, including economic development, job creation, and increased sales taxes.

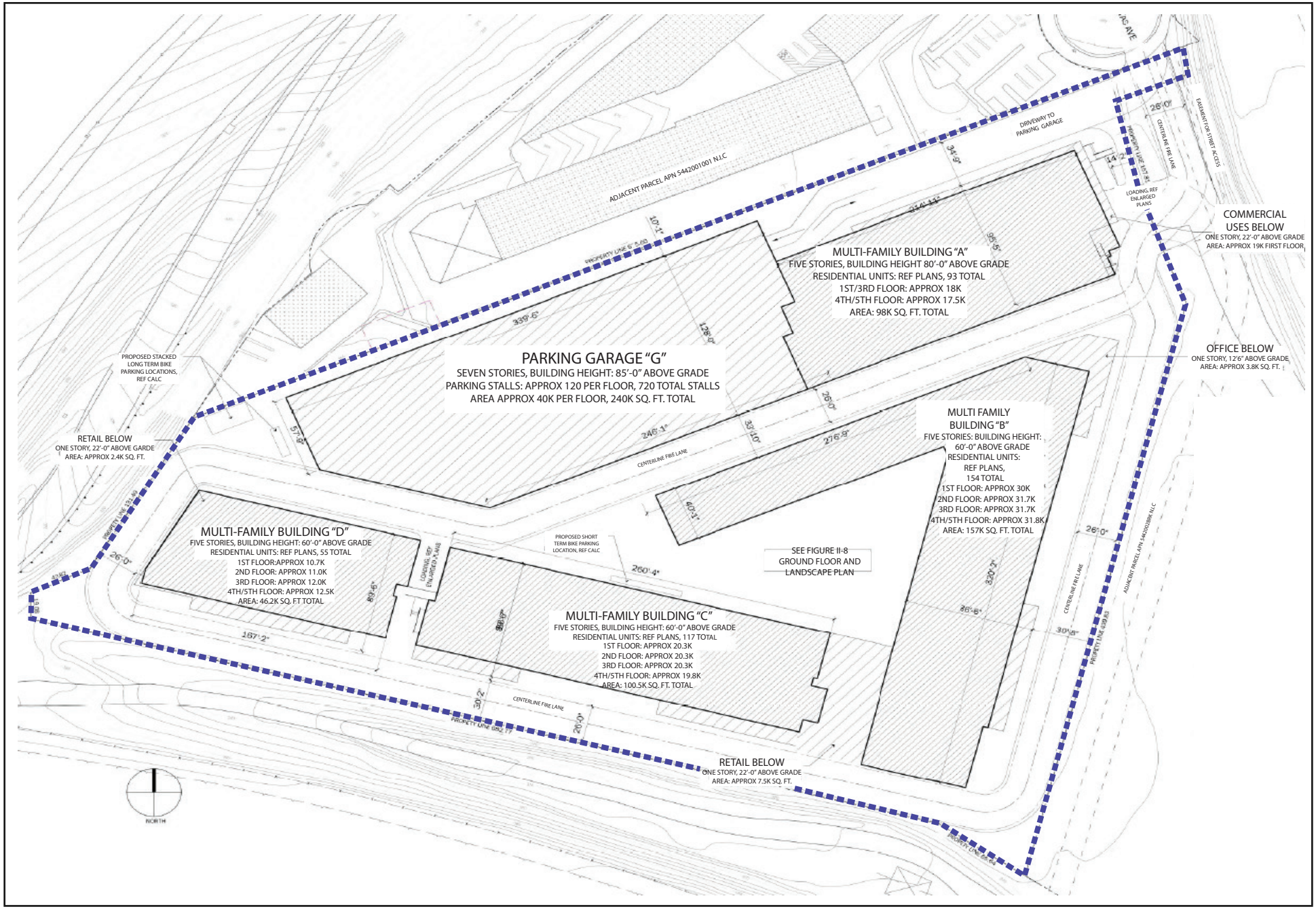
  - Support the existing commercial uses along Fletcher Drive and San Fernando Road with development that will bring new customers.

- Support a growing demand for ecologically sensitive urban farming operations through the provision of an urban farm.

# 4. Description of the Project

## a) Project Overview

The proposed Project includes the demolition of the existing 117,000-square-foot warehouse/production building on the approximately 5.7-acre (248,190 square feet) Project Site, and the construction of a mixed-use development that would consist of five buildings with a maximum height of 85 feet. The proposed Project would provide up to 419 multi-family residential units and up to 64,000 square feet of commercial space. The commercial space would include a mix of restaurant uses, office space, and a rooftop urban farm. The Project's residential and commercial uses would comprise up to 487,872 square feet of total floor area. A seven-story parking garage (Building G), adjacent to Building A, would provide approximately 720 parking spaces for the Project's residential and commercial uses (refer to Figure II-4, Proposed Plot Plan, below). The parking spaces would be provided in levels one through six, and an urban farm is proposed on the roof (seventh) level. Open space and recreational amenities would comprise approximately 58,176 square feet. A summary of the proposed Project with the proposed unit mix and floor area is provided in Table II-1, Summary of Proposed Land Uses. Figure II-4, Proposed Plot Plan, shows the general layout of the proposed Project. Figure II-5 shows the floor plan and landscape plan for the ground floor. Figure II-6 shows the typical floor plan and typical landscape plan for the upper levels.




Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-4
Proposed Plot Plan

Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-5
Ground Floor Plan and Landscape Plan

Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-6
Typical Upper Level Floor Plan and Typical Upper Level Landscape Plan

### (1) Residential Uses

The proposed Project would provide up to 419 multi-family residential apartment units, including a combination of studio, 1-bedroom, and 2-bedroom units. A summary of the Project is provided in Table II-1, below. Eleven percent of the base-density residential units (35 dwelling units) would be reserved as Very Low Income units.[1]

**Table II-1**
**Summary of Proposed Land Uses**

| Land Uses | Dwelling Units | Floor Area (Square Feet) |
|---|---|---|
| ***Residential*** | | |
| Studio Units | 119 du | -- |
| One-Bedroom Units | 220 du | -- |
| Two-Bedroom Units | 80 du | -- |
| **Residential Subtotal** | **419 du** | **423,872 sf** [a] |
| ***Commercial*** | | |
| General Office | **--** | 19,000 |
| Restaurant | **--** | 3,000 |
| Urban Farm | **--** | 42,000 |
| **Commercial Subtotal** | **--** | **64,000 sf** |
| **TOTAL** | **419 du** | **487,872 sf** |

*Notes: du = dwelling unit; sf = square feet*
[a] *Includes residential amenity space*
*Source: Rios Clementi Hale Studios, September 29, 2016.*

### (2) Commercial Uses

The proposed Project includes up to 64,000 square feet of commercial uses, including 19,000 square feet of general office, 3,000 square feet of restaurant space (including a beer garden), and an approximate 42,000-square-foot urban farm. The proposed commercial office space is proposed to be located on the ground floor of Building A, which is planned as a mixed-use building with residential units above the first level. The restaurant spaces would be located on the ground floor of Buildings B and C, oriented towards the Los Angeles River.

The proposed urban farm would occupy the seventh (roof) level of Building G and would include an enclosed greenhouse space for production of sustainable agriculture. The concept of the urban farm is to provide for sustainable agriculture production within infill development sites. The urban farm would provide locally sourced, non-GMO, pesticide-

[1] *Pursuant to Section 22.471.1, Very Low Income Units are defined as a household whose income does not exceed 50% of the Los Angeles area Standard Metropolitan Statistical Area (SMSA) median income as established by the U.S. Department of Housing and Urban Development (HUD) and is adjusted for family size.*

free vegetables and herbs for the local restaurant and retail produce markets. The urban farm would utilize ecologically sustainable methods in a 100-percent solar energy-powered, climate-controlled urban greenhouse.

A summary table describing the attributes and characteristics of the proposed Project is provided in Table II-2, Summary of Proposed Development Program, below.

**Table II-2**
**Summary of Proposed Development Program**

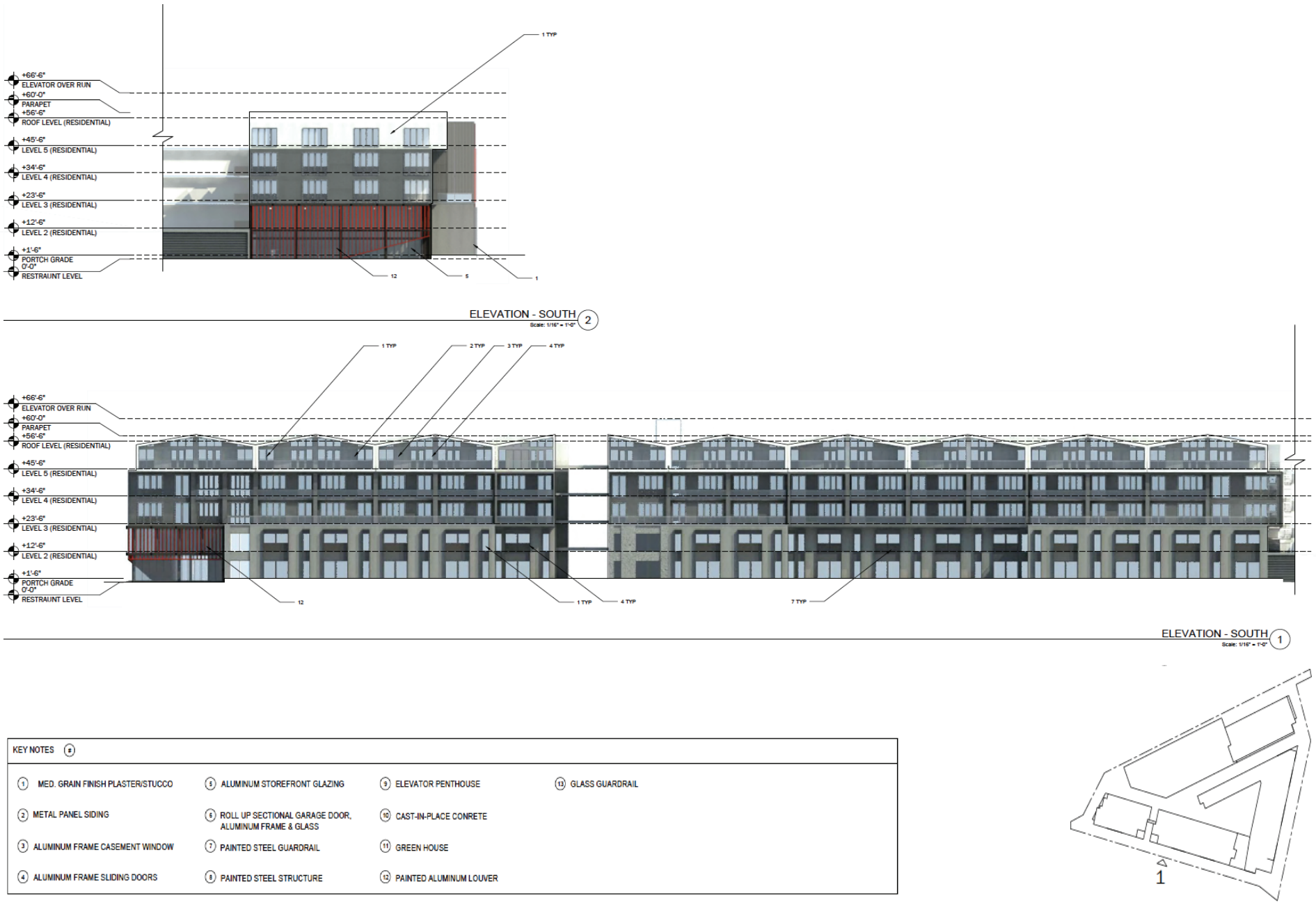
| Project Characteristics | Required/Allowed By Code | Proposed Project |
|---|---|---|
| Project Site Lot Area | -- | 248,190 (5.7 acres) |
| Proposed Floor Area | 502,584 [a] | 487,872 square feet |
| Floor Area Ratio (FAR) | 2.02 (1.5 base FAR plus 35%) | 2.0:1 |
| Maximum Building Height | unlimited | 85 feet |
| Open Space | 43,900 square feet | 58,176 square feet |
| Vehicle Parking Spaces | 627 stalls | 720 stalls |
| Bicycle Parking Spaces | 476 spaces | 476 spaces |

[a] *Based on a allowable FAR of 1.5:1 and a 35% increase pursuant to the Density Bonus incentive allowed under LAMC Section 12.22.A.25.*

## b) Building Design and Architecture

Architectural materials for the proposed buildings include medium grain finish plaster (stucco), concrete fiberboard panel siding, aluminum frame casement windows, aluminum frame sliding doors, aluminum storefront glazing, roll up sectional garage door, glass, painted steel guardrail and design features, and cast-in-place concrete.

Building elevations depicting the south façade of Buildings C and D are shown in Figure II-7 on page II-14. As shown in Figure II-7, Buildings C and D are proposed to be a maximum height of 60 feet above grade (with the elevator overrun at a height of 66.5 feet). Buildings C and D are connected with pedestrian walkways at Levels 2 through 5. East and north elevations for Building B are shown in Figure II-8 on page II-15. As shown in Figure II-8, Building B is proposed to be a maximum height of 60 feet above grade (with the elevator overrun at a height of 66.5 feet). Figure II-9 on page II-16 depicts the courtyard elevations between Buildings B and C for the south-, east-, and north-facing facades. Podium elevations for Buildings A and G are shown in Figure II-10 on page II-17. As shown in Figure II-10, the height of Building A is proposed to be 77 feet above grade to the top roof level, with a parapet height of 81 feet above grade and an elevator overrun extending to a height of 85 feet above grade. The top of the roof of the urban farm/greenhouse located on top of the 7-level garage building is 85 feet above grade. The south podium elevations are depicted in Figure II-11, Podium Elevations – South, on page II-20. Cross sectional elevations of the proposed buildings are shown in Figure II-12, Site

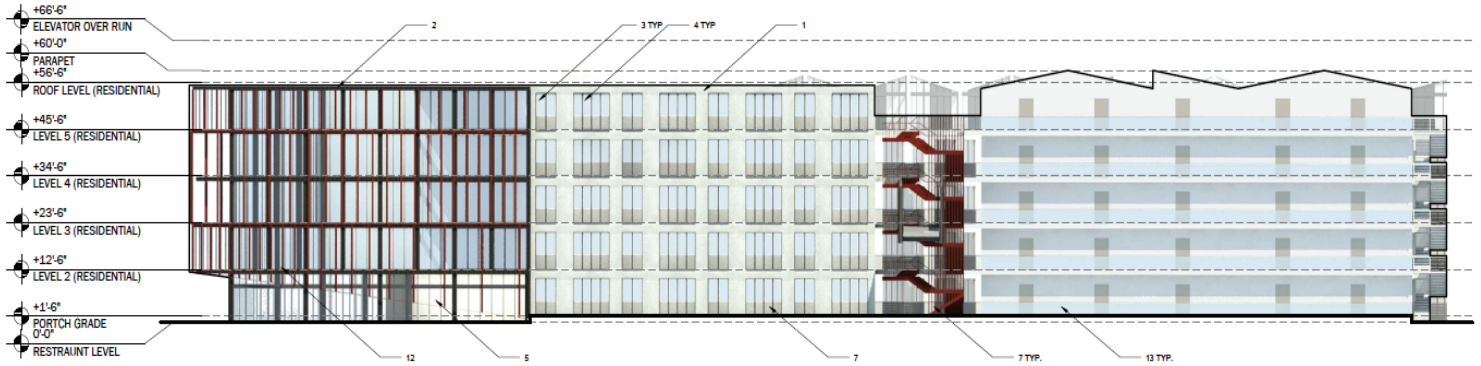



Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-7
Building C and Building D Elevations - South

ELEVATION - EAST 2

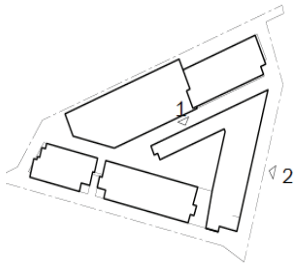
Scale: 1/16" = 1'-0"




ELEVATION - NORTH 1

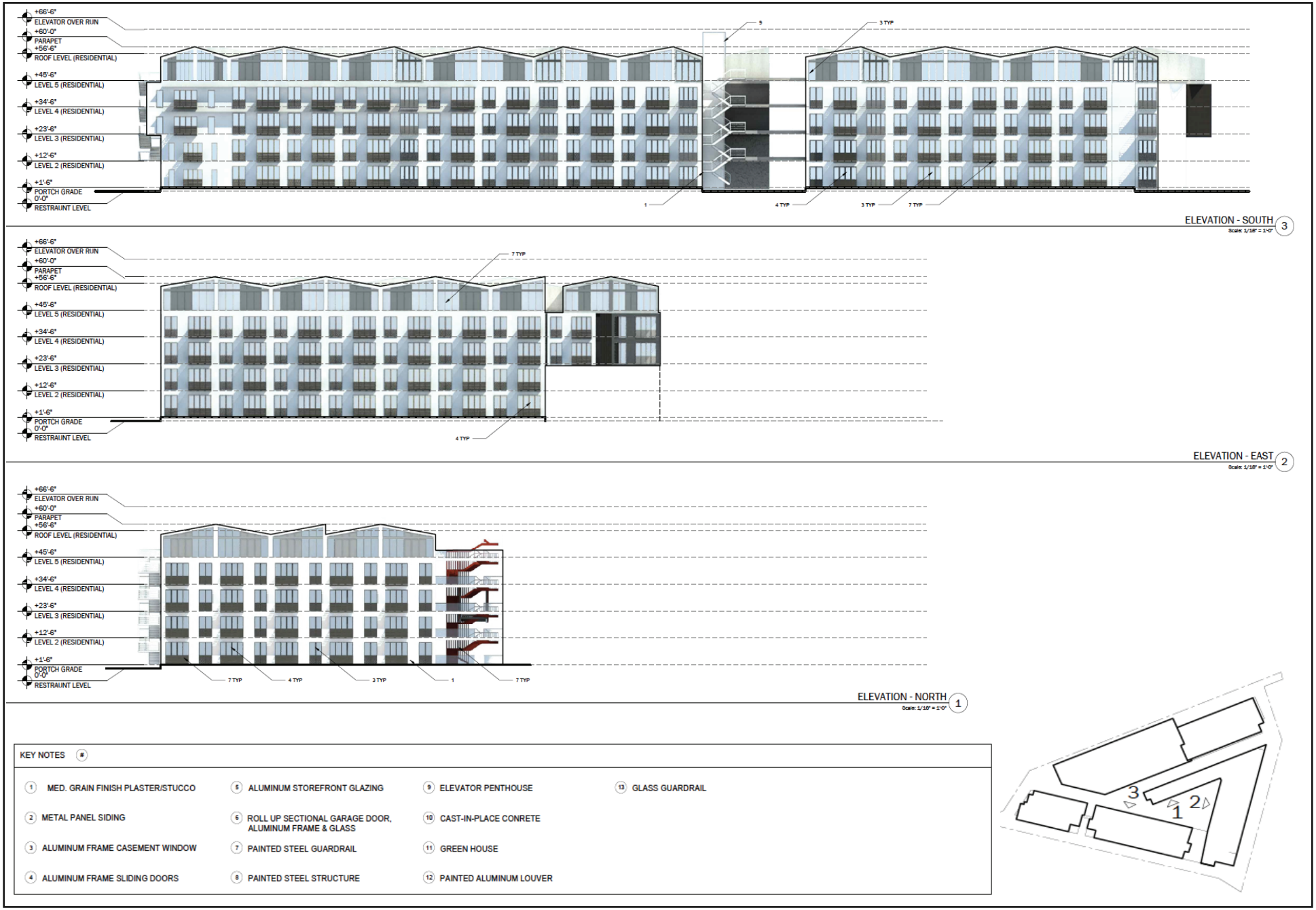
KEY NOTES (#)

| | | | |
|---|---|---|---|
| 1 MED. GRAIN FINISH PLASTER/STUCCO | 5 ALUMINUM STOREFRONT GLAZING | 9 ELEVATOR PENTHOUSE | 13 GLASS GUARDRAIL |
| 2 METAL PANEL SIDING | 6 ROLL UP SECTIONAL GARAGE DOOR, ALUMINUM FRAME & GLASS | 10 CAST-IN-PLACE CONRETE | |
| 3 ALUMINUM FRAME CASEMENT WINDOW | 7 PAINTED STEEL GUARDRAIL | 11 GREEN HOUSE | |
| 4 ALUMINUM FRAME SLIDING DOORS | 8 PAINTED STEEL STRUCTURE | 12 PAINTED ALUMINUM LOUVER | |




Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-8
Building B Elevations - East and North

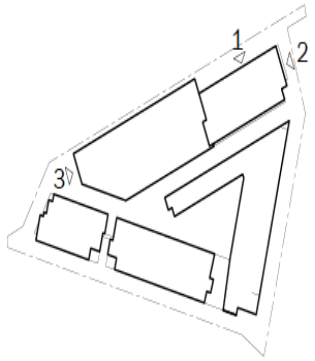



Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-9
Courtyard Elevations - South, East and North

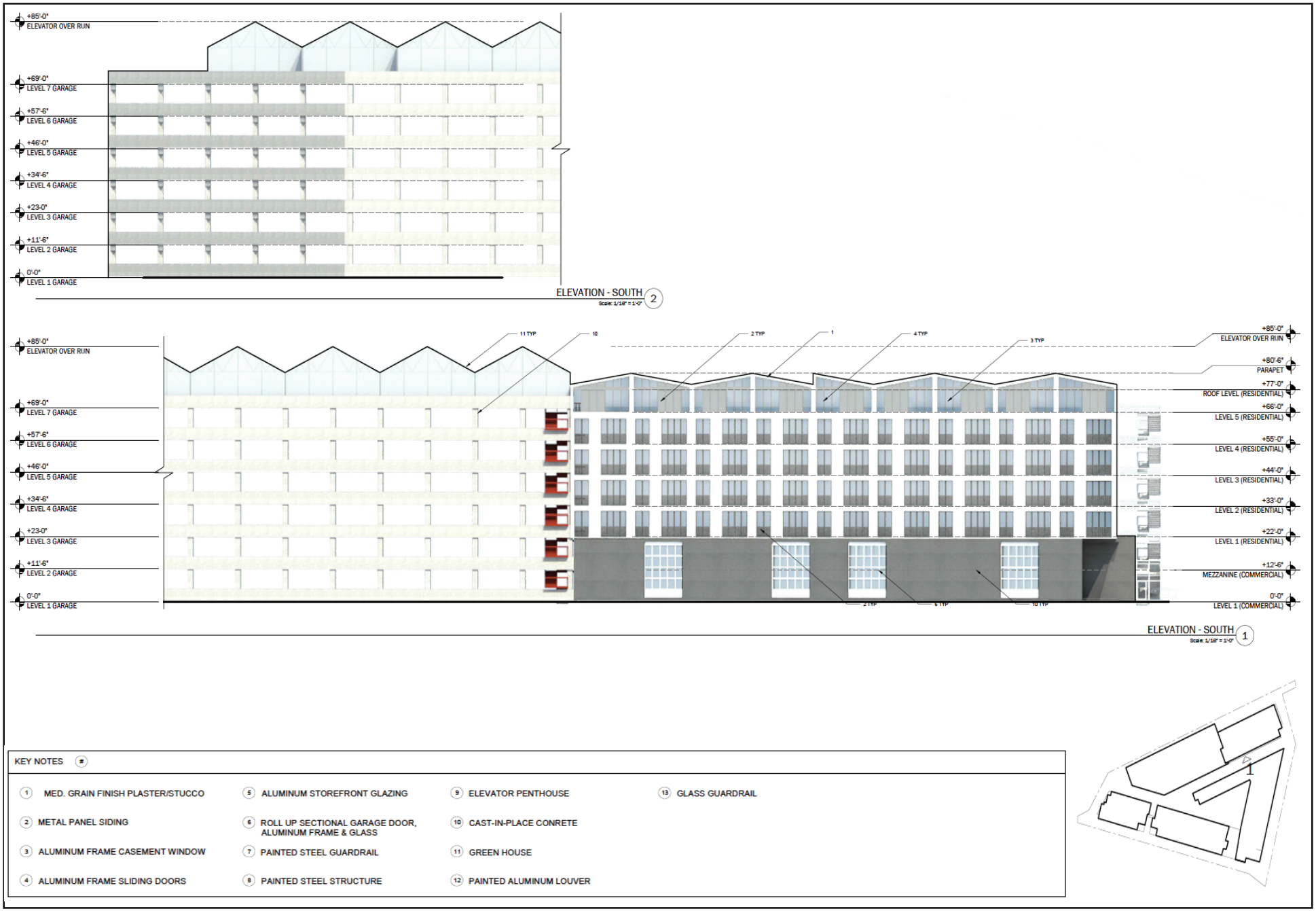
KEY NOTES (#)

| | | | |
|---|---|---|---|
| 1 MED. GRAIN FINISH PLASTER/STUCCO | 5 ALUMINUM STOREFRONT GLAZING | 9 ELEVATOR PENTHOUSE | 13 GLASS GUARDRAIL |
| 2 METAL PANEL SIDING | 6 ROLL UP SECTIONAL GARAGE DOOR, ALUMINUM FRAME & GLASS | 10 CAST-IN-PLACE CONRETE | |
| 3 ALUMINUM FRAME CASEMENT WINDOW | 7 PAINTED STEEL GUARDRAIL | 11 GREEN HOUSE | |
| 4 ALUMINUM FRAME SLIDING DOORS | 8 PAINTED STEEL STRUCTURE | 12 PAINTED ALUMINUM LOUVER | |




Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-10
Podium Elevations - West and North




Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-11
Podium Elevations - South

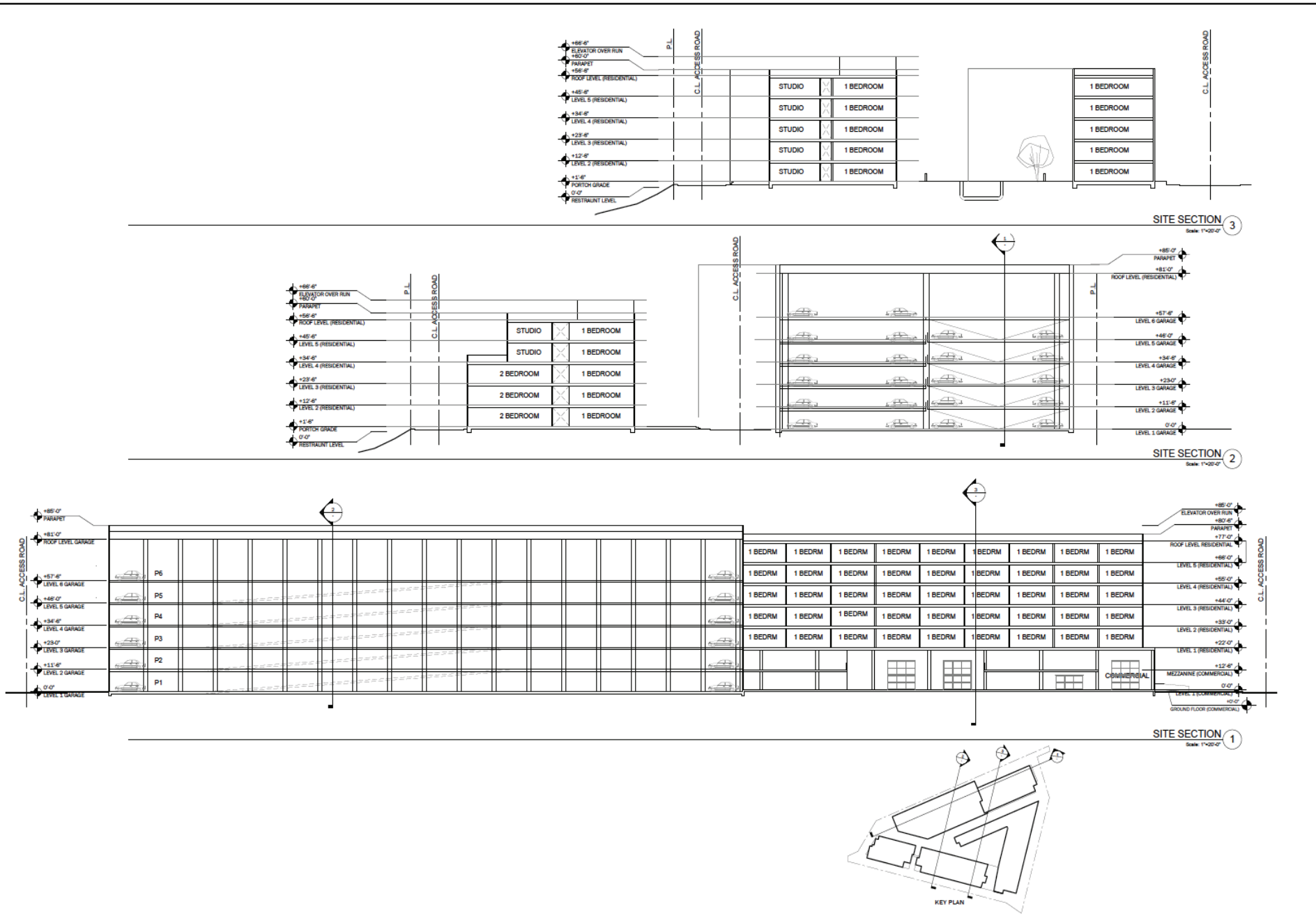
Sections of the Proposed Buildings, on page II-20. Illustrative renderings depicting the views from the southeast corner of the Project Site (depicting Buildings B, C, and D) and the northeast corner of the Project Site (depicting Buildings A and B) are shown in Figure II-13, Illustrative Renderings on page II-21.

## c) Open Space and Recreational Amenities

The proposed Project would include 58,176 square feet of open space. The open space requirements and amount of open space proposed for the proposed Project are summarized in Table II-3 below. As shown, the proposed Project exceeds the amount of open space required by the LAMC by approximately 14,276 square feet.

As illustrated in the landscape plans, depicted in Figure II-5 and Figure II-6, above, the proposed Project would feature a variety of trees, shrubs, vines, and perennials. Proposed landscaping would also feature a variety of ornamental streetscape and common area landscaping. The Project would include a communal patio, pool deck, lounge seating, outdoor barbeque, amenity deck, and community room space. Pursuant to the minimum tree requirements specified in LAMC Section 12.21-G,2 (i.e., 1 tree per every 4 dwelling units), the Project would require a minimum of 105 trees. The proposed Project would include 140 trees. As shown in Figure II-5, Ground Floor Plan and Landscape Plan, and Figure II-6, Typical Upper Level Floor Plan and Typical Upper Level Landscape Plan, the landscaping features would be provided at grade, on the porch levels (private balconies), on the upper deck on balconies, and in the common open space areas.

The proposed open space plan is depicted in Figure II-14 on page II-22. Additional building elevations depicting the Project with the proposed landscaping features are shown in Figure II-15, Landscape Exterior Elevations, and Figure II-16, Landscape Courtyard Elevations, on pages II-23 and II-24, respectively.




Source: Rios Clementi Hale Studios, June 22, 2018.

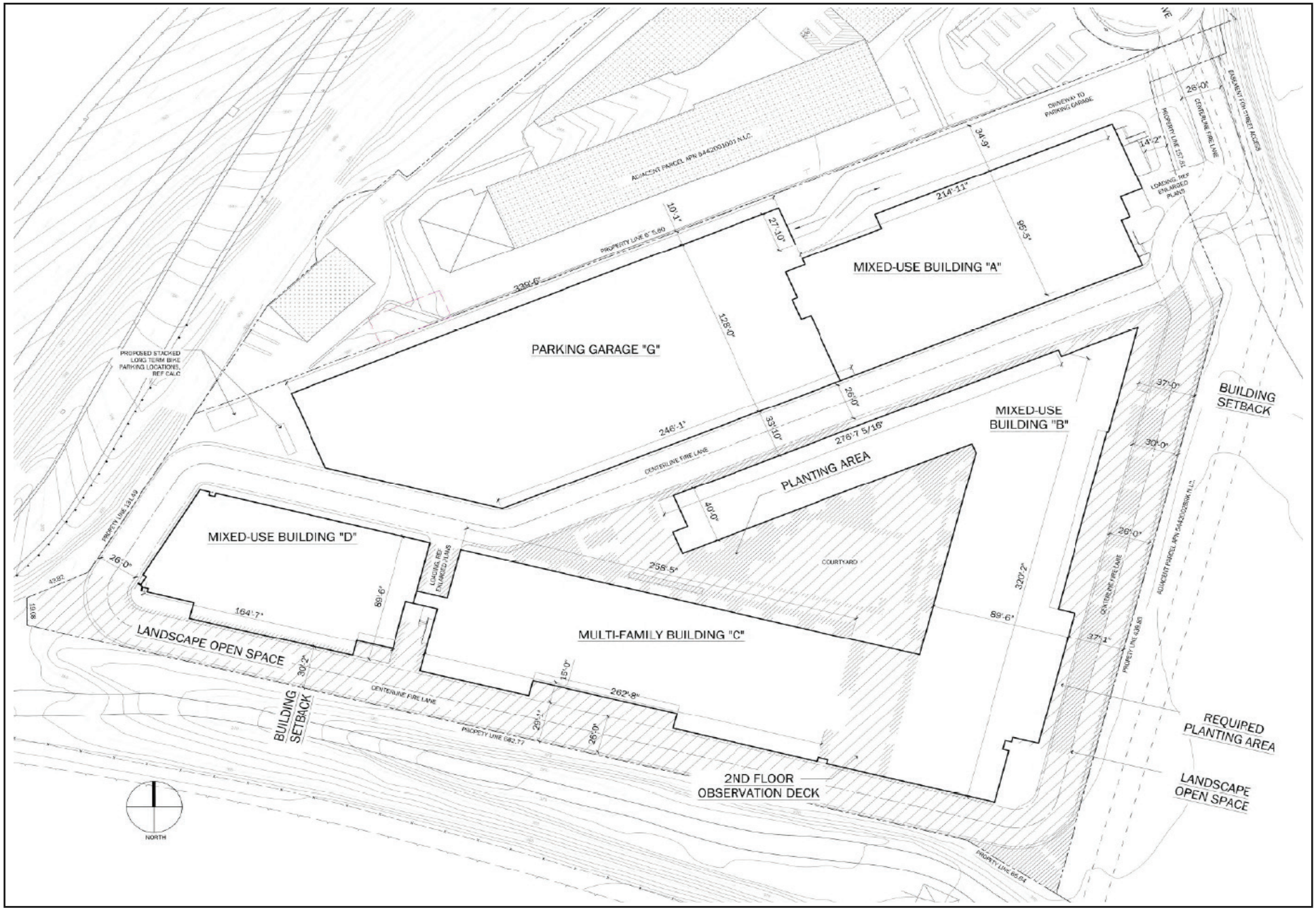
Figure II-12
Site Sections of the Proposed Buildings

View from the southeast corner of the Project Site, looking west at Buildings B, C, and D.

View from the northeast corner of the Project Site, looking southwest at the Buildings A and B.

Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-13
Illustrative Renderings




Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-14
Open Space Plan

Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-15
Landscape Exterior Elevations

Source: Rios Clementi Hale Studios, June 22, 2018.

Figure II-16
Landscape Courtyard Elevations

**Table II-3**
**Required and Proposed Open Space Calculations**

| Open Space Code Requirements | | | |
|---|---|---|---|
| **Type** | **Number of Units** | **Square Feet Required [a]** | **Total Square Feet Required** |
| Less than three habitable rooms (studio units and 1-bedroom units) | 339 | 100 sf / du | 33,900 |
| Three habitable rooms (2-bedroom units) | 80 | 125 sf / du | 10,000 |
| | | **TOTAL** | **43,900** |
| **Open Space Areas** | | **Area Proposed (Square Feet)** | |
| Ground Level | | 35,478 | |
| Porch Level | | 18,888 | |
| Second Level | | 3,810 | |
| **TOTAL OPEN SPACE PROPOSED** | | **58,176** | |

[a] *LAMC Section 12.21-G,2*
*Source: Rios Clementi Hale Studios, September 29, 2016.*

## d) Signage and Lighting

The proposed Project would provide site identification and tenant signage for the commercial land uses and way-finding signage in accordance with the requirements of the LAMC. Interior spaces and exterior walkways, accessways, open space areas, and fire lanes would be illuminated with low-level and directional lighting futures to provide for safe and secure pedestrian lighting environment. Lighting and illumination would conform to the illumination standards of the LAMC. Lighting fixtures would be designed and installed to ensure the direct light source cannot be seen from adjacent residential properties and/or the public right-of-way.

## e) Access, Circulation, and Public Transportation

Vehicular access to the Project Site would be provided by a full-access driveway off of Casitas Avenue, which would allow ingress and egress to and from the parking structure on-site. A separate driveway for loading would be located on the east side of Building A to allow delivery trucks to temporarily park on the Project Site. A designated fire lane would traverse the Project Site connecting from the northeast corner to the southwest corner of the Project Site; the fire lane would then run along the southern and eastern property lines of the Project Site where it connects back to Casitas Avenue. The fire lane

along the southern and eastern property lines would also serve as a bike path and landscaped area for pedestrian use.

### (1) Parking

The proposed Project would provide approximately 720 parking spaces, all located within the proposed parking structure (Building G), which includes residential and commercial designated parking spaces. With approximately 720 parking spaces provided on-site, the proposed Project would provide 93 more spaces than the minimum spaces required by the LAMC. The proposed parking inventory would provide 1.4 spaces per dwelling unit to meet the proposed Project's anticipated parking demand. A summary of the proposed Project's required and proposed parking spaces are provided in Table II-4, below.

**Table II-4**
**Summary of Required and Proposed Vehicle Parking Spaces**

| Description | Quantity | Parking Required by Code [a] | | Parking Provided |
|---|---|---|---|---|
| | | Rate | Spaces | |
| ***Residential*** | | | | |
| For each Residential Unit of 0-1 bedroom | 339 du | 1 space / du | 339 | -- |
| For each Residential Unit of 2-3 bedrooms | 80 du | 2 spaces / du | 160 | -- |
| | | ***Residential Subtotal*** | ***499*** | **--** |
| ***Commercial*** [b] | | | | |
| Commercial | 64,000 sf | 1 space / 500 sf | 128 | -- |
| | | ***Commercial Subtotal*** | ***128*** | **--** |
| | | **TOTAL** | **627** | **720** |

*Notes: du = dwelling unit, sf = square feet*
[a] *LAMC Section 12.22-A, 25(d)(1).*
[b] *The Project Site is located within an Enterprise Zone, which requires a minimum of 1 space / 500 sf for all commercial uses.*
*Source: Rios Clemente Hales Studios, September 29, 2016.*

The proposed Project would provide bicycle parking in accordance with the City's Bicycle Ordinance. As summarized in Table II-5, Summary of Required and Proposed Bicycle Parking Spaces, below, the proposed Project would be required to provide 476 bicycle spaces, which includes 427 long-term bicycle spaces and 49 short-term bicycle spaces. Bicycle parking spaces would be provided on the first level of the proposed parking structure (Building G) and in outdoor bike parking areas located throughout the Project Site.

**Table II-5**
**Summary of Required and Proposed Bicycle Parking Spaces**

| Description | Quantity | Bicycle Parking Requirements [a] | | Total Spaces Required | Parking Provided |
|---|---|---|---|---|---|
| | | Short Term | Long Term | | |
| *Residential* | | | | | |
| Dwelling Units 1-25 | 25 | 2 | 25 | 27 | 27 |
| Dwelling Units 26-100 | 75 | 5 | 50 | 55 | 55 |
| Dwelling Units 101-200 | 100 | 10 | 50 | 60 | 60 |
| Dwelling Units 201+ | 219 | 5 | 55 | 60 | 60 |
| ***Subtotal Residential*** | ***419 du*** | ***22*** | ***180*** | ***202*** | ***202*** |
| *Commercial* | | | | | |
| Office (1 space /10K sf and 1 space/5K sf | 19,000 sf | 2 | 2 | 4 | 4 |
| Restaurant (1 space/2K sf) | 3,000 sf | 2 | 2 | 4 | 4 |
| Urban Farm (1 space/10 K sf) | 42,000 sf | 4 | 4 | 8 | 8 |
| ***Subtotal Commercial*** | | **8** | **8** | **16** | **16** |
| **TOTAL** | | **30** | **188** | **218** | **218** |

*Notes: du = dwelling unit, sf = square feet*
[a] *Parking requirements pursuant to LAMC Section 12.22-A.25(d)(1).*
*Source: Rios Clemente Hales Studios.*

### (2) Public Transportation

The Project area is currently served by a total of three local Metro transit service lines, including one Metro Rapid Bus line (794), four Metro Local Bus lines (90, 91, 94, and 96) and one Metro Circulator Bus line (603). Located north of the Project Site, Fletcher Drive carries one Metro Circulator Bus line (603). To the west of the Project Site, Riverside Drive carries one Metro Local Bus line (96). Located east of the Project Site, San Fernando Road carries three Metro Local Bus lines (90, 91, and 94) and one Rapid line (794). Walking distance to the nearest bus stop (Line 603) on Fletcher Drive is 0.25 miles. The nearest stop to lines 90,91,94, 603 and 794 on San Fernando Road are located approximately 0.5 mile walking distance from the Project Site. Line 96 on Riverside Drive is an approximately 0.87 mile walk from the Project Site. Additionally, the Project area is served by two inter-city transit operators, including Metrolink and Amtrak, as the Project Site is located approximately 1.6 miles south of the Glendale Metrolink and Amtrak station.

The proposed Project would support the use of public transit, pedestrian, and bicycle facilities by accommodating bicycle and pedestrian access through the Project Site and

providing connectivity between Casitas Avenue, the pedestrian path along the Los Angeles River, and the Taylor Yard.

### (3) Emergency Access

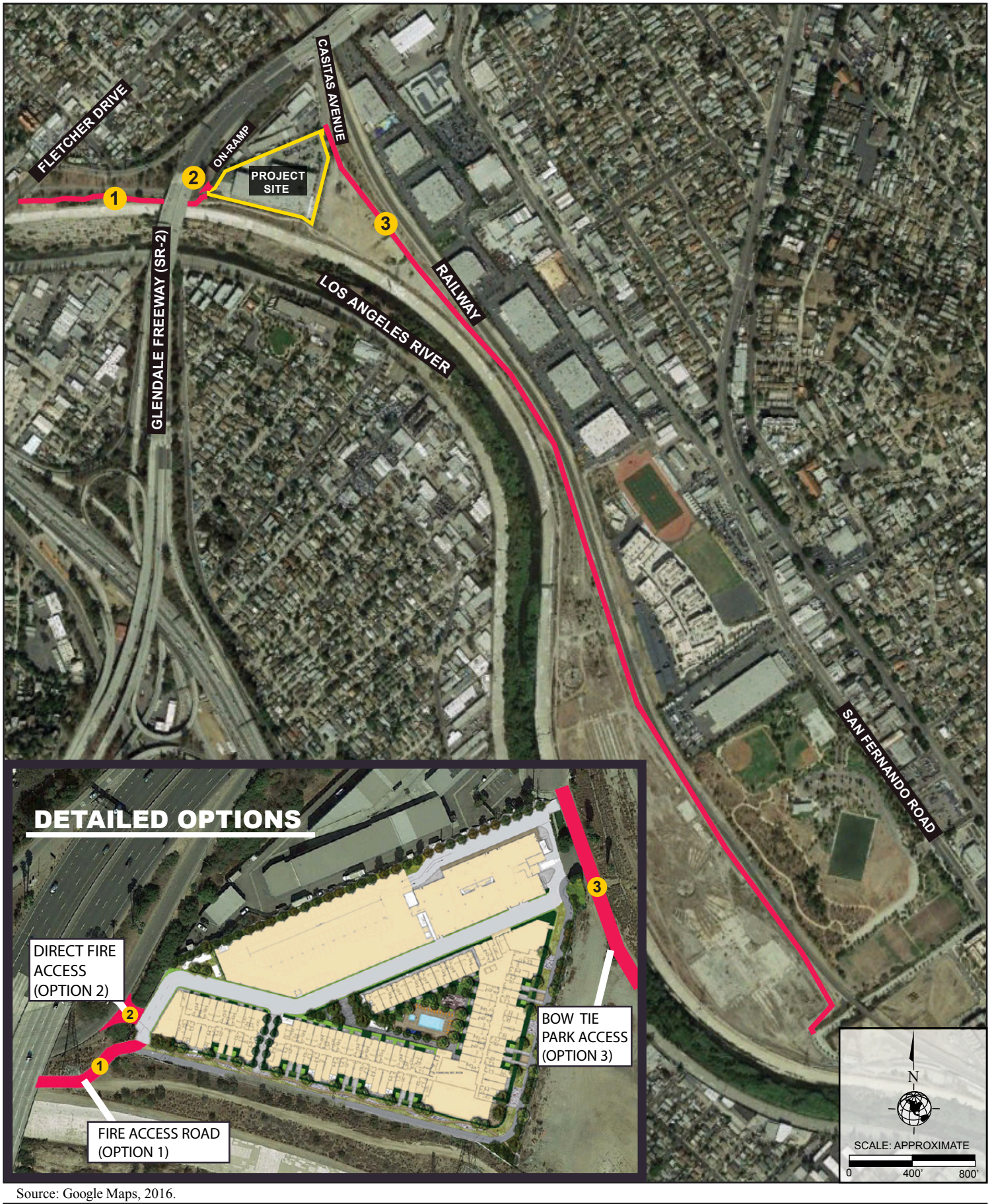
Primary access to the Project Site is available via a main access driveway on Casitas Avenue. This driveway serves as the primary and main point of access to the Project Site for all vehicles, including emergency vehicles. Due to the Project Site's limited access, the Los Angeles Fire Department (LAFD) has requested the Applicant to identify a secondary access point for emergency access and evacuation purposes. It is therefore anticipated that an emergency secondary access/egress to/from the Project Site will be required as a condition of Project approval. Because a secondary emergency access route would be subject to approval by local and/or state entities, the Applicant would implement one of the following three potential emergency access options shown in Figure II-17 Secondary Emergency Access Options to satisfy this condition:

- Option 1: An emergency access gate from the west side of the Project Site connecting to the existing LADWP-owned easement improved with a paved service road on the east bank of the Los Angeles River Channel accessible via Fletcher Drive. This option would require obtaining permission from LADWP, which owns this land (as shown in Figure II-17, Secondary Emergency Access Options);

- Option 2: An emergency access gate and driveway from the northbound on-ramp of SR-2, immediately north of an adjacent to the Project Site. This option would require approval from Caltrans; and

- Option 3: An emergency access gate on the south side of Casitas Avenue providing access through the State Park property. This option would necessitate improving and paving an approximate 1.2-mile access road through a currently vacant site (which is planned for future parkland) and would require obtaining the permission of the State Parks Department.

Each of the three options, which would require permissions by the respective local/state entities, are identified and delineated in Figure II-17 Secondary Emergency Access Options.




Source: Google Maps, 2016.

Figure II-17
Secondary Emergency Access Options

## f) Floor Area Ratio (FAR) and Setbacks

The Project Site includes a total of 248,190 gross square feet of lot area. The Project Site is located in Height District No. 1, which limits development to an FAR of 1.5:1 but has no restriction on building height. Pursuant to LAMC Section 12.2.1, the Project Site has an allowed floor area ratio (FAR) of 1.5 to 1. Since the proposed Project would reserve 11 percent of its residential units as Very Low Income housing units, the Project is eligible for a base FAR increase of 35 percent. As such, the Project would be allowed a maximum floor area of 502,584 square feet. The Project consists of up to 487,872 square feet of total floor area (up to 2.0:1 FAR). The proposed Project includes five buildings. Building A would include a maximum of six stories and would be up to 81 feet above grade to the top of the parapet. Buildings B, C, and D would include a maximum of five stories and would be up to 60 feet above grade to the top of the parapet. The parking garage and rooftop urban farm/greenhouse proposed in Building G would include seven stories with a building height of up to 85 feet above grade. The building elevations and cross sections of the proposed buildings are illustrated in Figure II-7 through Figure II-11.

Pursuant to the LAMC Section 12.17.1, setbacks for the residential portions of the proposed Project would be required to comply with setback requirements for the R4 Zone with the exception that no front yard setback is required. No front yard setback is required for a CM zone. The R4 Zone requires a minimum of a 5-foot side yard setback with an additional foot added to the width of each side yard for each additional story above the second story. The R4 Zone also requires a minimum of a 15-foot rear yard setback with an additional foot added to the width to of the rear yard for each additional story above three stories. Table II-6, provides a summary of the required and proposed setbacks for each building. As summarized in Table II-6, the Proposed Project would be consistent with the yard requirements of the LAMC. The side yards and rear yards are used as a driveway, fire access lane, pedestrian path, bicycle path and landscaping. Therefore, the proposed Project would be consistent with setback requirements for the Project.

**Table II-6**
**Summary of Required and Proposed Building Setbacks**

| Bldg. | Stories | Setback Required | | | Setback Provided | | |
|---|---|---|---|---|---|---|---|
| | | Front | Side | Rear | Front | Side | Rear |
| A | 6 | 0’ | 5’ +4’ = 9’ | 15’ + 3’ = 18’ | 14’ | 34’ | > 350’ |
| B | 5 | 0’ | 5’ +3’ = 8’ | 15’ + 2’ = 17’ | 50’ | 26’ to 37’ | 26’ |
| C | 5 | 0’ | 5’ +3’ = 8’ | 15’ + 2’ = 17’ | > 250’ | 69’ | 26’ |
| D | 5 | 0’ | 5’ +3’ = 8’ | 15’ + 2’ = 17’ | > 250’ | 26’ | 30’ |
| G | 7 | 0’ | 5’+ 4’ = 9’ | 15’ + 4’ = 19’ | 228’ | 10’ 1” | > 100’ |
| *Source: Rios Clemente Hale, September 29, 2016.* | | | | | | | |

# 5. Project Construction and Scheduling

## a) Construction Activities

All construction activities would be performed in accordance with all applicable state and federal laws, and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M., Mondays through Fridays, and between 8:00 A.M. and 6:00 P.M. on Saturdays or any national holiday. No construction activities are permitted on Sundays. The Project will comply with these restrictions.

Due to the Project's location at the terminus of Casitas Avenue, construction activities are not anticipated to require any lane closures on local streets. Site deliveries and the staging of all equipment and materials would be organized on-site in the most efficient manner possible to avoid and minimize any temporary impacts upon the surrounding neighborhood. Construction equipment would be staged on-site for the duration of construction activities. Additionally, all construction workers would be required to park on-site or within a designated off-street parking lot as specified in the Construction Traffic Control/Management Plan.

## b) Construction Schedule

This analysis assumes a construction schedule of approximately 30 months, with final buildout occurring in 2023. Construction activities associated with the proposed Project would be undertaken in six main activities: (1) demolition, (2) site clearing/preparation, (3) excavation/grading, (4) building construction, (5) paving, and (6) architectural coatings/finishing.

The demolition and site clearing phases would include the demolition of approximately 117,000 square feet of the existing building and the removal of the asphalt paved parking lot (3,000 cubic yards of asphalt) on the Project Site. The site clearing phase would include the removal of street trees, walls, fences, and other parking lot related debris. The demolition and site clearing would be completed in approximately two months. It is estimated that approximately 10,800 cubic yards of demolition debris would be hauled from the Project Site during the demolition phase. Pursuant to Section 4.408.1 of the California Green Building Code (CALGreen) and the City of Los Angeles Bureau of Sanitation (LASAN) requirements, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility.

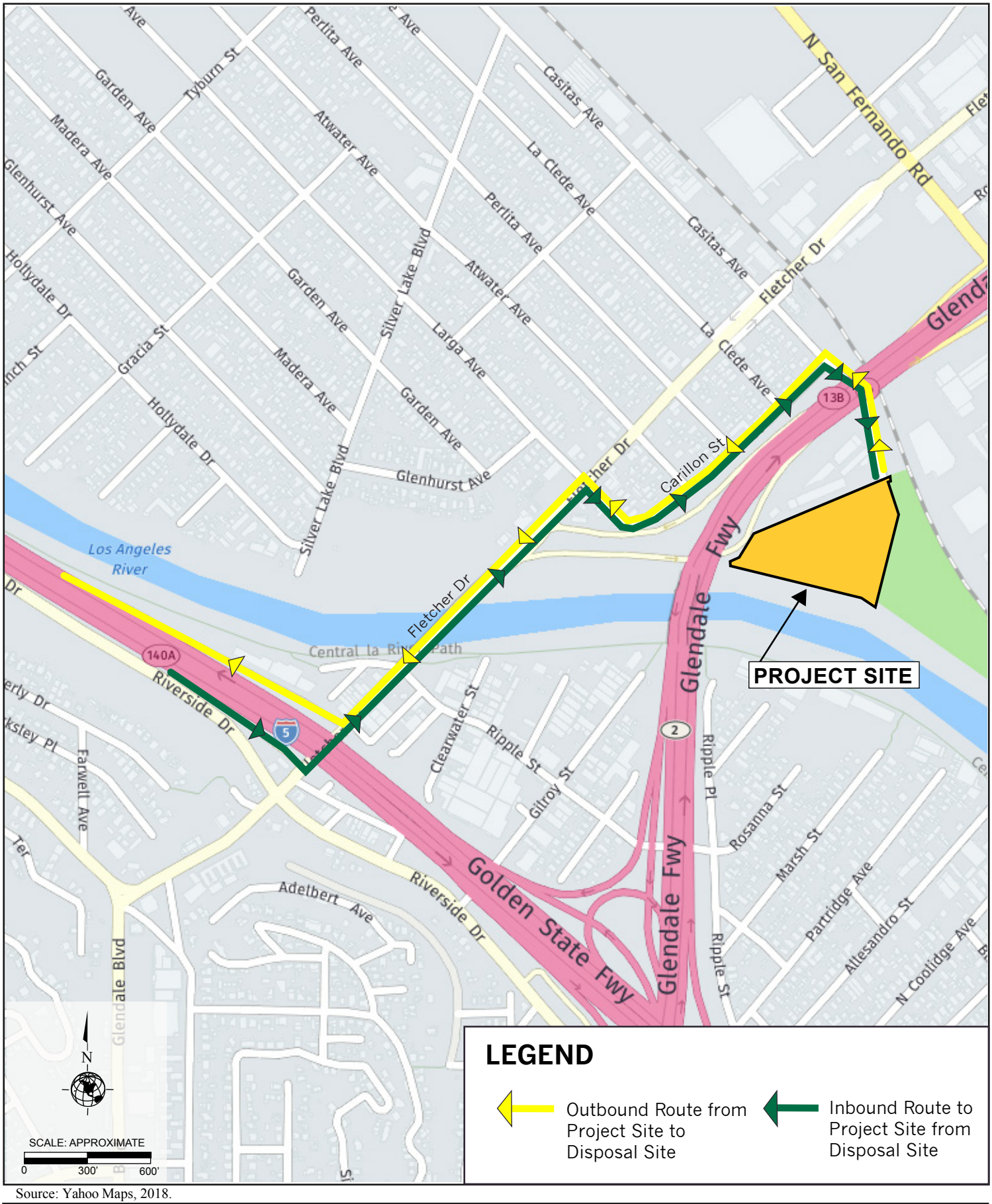
After the completion of demolition and site clearing, the grading/excavation phase for the Project would occur for approximately two months and would involve excavations up to approximately 15 feet for earthwork removal and recompaction. No subterranean parking is proposed as part of the Project, and all proposed uses would be above grade. The Project would require approximately 10,000 cubic yards of soil to be hauled off-site and 10,000 cubic yards of soil to be imported in order to ensure a proper base for the building foundations.[2] As part of the Project, a Construction Traffic Control/Management Plan and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Control/Management Plan and Truck Haul Route Program would be subject to Los Angeles Department of Transportation (LADOT) review and approval. The anticipated haul route to and from the I-5 Freeway is depicted in Figure II-18, Proposed Haul Route on page II-33.

The building construction phase is expected to occur for approximately 20 months. Building construction activities would include pouring the building foundations, structural framing, and installing plumbing, electrical, heating, natural gas, and heating ventilation and air conditioning (HVAC) systems.

The paving phase would involve pouring concrete for sidewalks and driveway access lanes and laying irrigation for landscaping. It is estimated that paving would occur for one month, which includes cementing the fire lanes and bike lanes.

The architectural coatings/finishing phase would include installing window and fascade elements, painting, and installing wayfinding signage. The architectural coatings would occur over the final three months of the construction process.

[2] *To provide additional flexibility during the earthwork and grading phases and the potential for unsuitable fill materials to be encountered during construction, the EIR analyzes 10,000 cy of soil export and 10,000 cy of soil import.*




Source: Yahoo Maps, 2018.

Figure II-18
Proposed Haul Route

# 6. Necessary Approvals

Under CEQA, the public agency that has the principal responsibility for carrying out or approving a project is referred to as the Lead Agency (State CEQA Guidelines Section 15367). For purposes of the 2800 Casitas Avenue Project, formerly the Bow Tie Yard Lofts Project, the City of Los Angeles is the primary governmental agency responsible for approving the proposed Project. As such, the EIR must be certified and the proposed Project must be approved by the City of Los Angeles before the Project can commence. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the proposed Project.

Approvals required for development of the Project may include, but not be limited to, the following:

1) Pursuant to LAMC Section 11.5.6, a **General Plan Amendment** to the Northeast Los Angeles Community Plan to change the land use designation from Heavy Manufacturing to Limited Industrial;

2) Pursuant to LAMC Section 12.32-Q, a Vesting **Zone Change and Height District Change** from [Q]PF-1-CDO-RIO to [Q]CM-1-CDO-RIO;

3) Pursuant to LAMC Section 16.05-C,1(b), **Site Plan Review** for the development of up to 419 residential units and up to 64,000 square feet of commercial uses;

4) Pursuant to California Government Code Section 65915(f)(3) and LAMC Section 12.22-A,25, a **Density Bonus Compliance Review** for the Project providing 11 percent of the total units (excluding density bonus units) as Very Low Income Units to permit a mixed-use development with the following development incentive and waiver:

    a. Density Bonus to allow a 35-percent increase in the permitted density to allow 419 units in lieu of the 310 units otherwise permitted in the CM zone;

    b. One on-menu incentive to allow a maximum 35-percent increase in Floor Area Ratio (FAR); and

    c. One off-menu waiver to use the lot area of the site as the buildable area for calculating floor area;

5) Pursuant to LAMC Section 13.08, **Design Overlay Plan Approval**;

6) Pursuant to LAMC Section 12.24-W,1, a **Conditional Use Permit (CUB)** to

allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption in conjunction with (a) a proposed restaurant with 1,435 square feet of interior space and 838 square feet of exterior space and 104 total seats, inclusive of outdoor seating; and (b) a proposed beer garden with 845 square feet of interior space and 1,951 square feet of exterior space and 105 total seats, inclusive of outdoor seating; and

7) Pursuant to LAMC Section 17.15, a **Vesting Tentative Tract Map** for the subdivision of one lot into one ground lot and 17 airspace lots.

Other approvals may be necessary, including demolition permits, haul route approval, grading, and associated building permits. On-site parking would be provided pursuant to LAMC Section 12.22-A,25(d)1.

Federal, state, and regional agencies that may have jurisdiction over some aspect of the project include, but are not limited to:

- California Regional Water Quality Control Board (RWQCB);
- California State Parks;
- Los Angeles Department of Water and Power (LADWP);
- Caltrans; and the
- South Coast Air Quality Management District (SCAQMD).

# III. Environmental Setting

## 1. Introduction

Section 15125, subdivision (a) of the CEQA Guidelines provides:

> *"An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The descripting of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives."*

The following Section provides a generalized overview of the environmental conditions that exist at the Project Site and the surrounding area at the time the Notice of Preparation (NOP) was published. The NOP for the Bow Tie Yard Lofts Project was published on February 9, 2017. A detailed and more focused description of the environmental and regulatory setting as it pertains to each of the environmental issue areas addressed within the scope of this Draft EIR is provided in each respective chapter within Section IV, Environmental Impact Analysis.

## 2. Project Site

### a) Project Location

The Project Site is located within the boundaries of the Northeast Los Angeles Community Plan area in the City of Los Angeles, approximately four miles north of downtown Los Angeles. The Project Site is located off of Casitas Avenue, which terminates at the northeast corner of the Project Site. The Glendale Freeway (SR-2) is located to the west of the Project Site. The Los Angeles River is located to the south of the Project Site. A railway is located to the northeast of the Project Site.

Primary regional access to the Project Site is provided by the Glendale Freeway (SR-2), which is located to the west and northwest of the Project Site. The Glendale Freeway runs in a north-south direction in the vicinity of the Project Site. Glendale Freeway terminates to the south of the Project Site, where it joins with Glendale Boulevard. To the north of the Project Site, the Glendale Freeway continues into the Angeles National Forest

and provides access to the Pasadena Freeway (I-210). The Glendale Freeway (SR-2) provides access to the Golden State Freeway (I-5), south of the Project Site and access to the greater highway network of the Los Angeles metropolitan region.

Local street access is provided by Casitas Avenue, which terminates at the northeast corner of the Project Site. The City of Los Angeles Mobility Plan 2035 designates Casitas Avenue as a local street. Access to Casitas Avenue is provided by the grid roadway system in the surrounding area to the west of the Project Site and the Glendale Freeway (SR-2).

## b) Existing Land Uses

The Project Site includes one parcel that totals approximately 248,190 square feet of gross lot area (5.7 acres). A summary of the Project Site's property addresses, Assessor's Parcel Numbers ("APN"), and lot area is summarized in Table III-1, Project Site Summary, below.

**Table III-1**
**Project Site Summary**

| Property Address | APNs | Existing Use | Gross Lot Area (Square Feet) |
|---|---|---|---|
| 2750-2800 W. Casitas Avenue | 5442002012 | Light Manufacturing Building (approximately 117,000 square feet, including 87,000 sf manufacturing space, 25,000 sf warehouse, and 5,000 sf production space) | 248,190 |
| | | **TOTAL GROSS LOT AREA** | **248,190** |

*Notes: sf = square feet*
*Sources: City of Los Angeles Department of City Planning, Parcel Profile Reports, Zoning Information and Map Access System (ZIMAS), http://www.zimas.lacity.org, accessed August 2016; and Rios Clementi Hale Studios, September 29, 2016.*

As summarized in Table III-1, the Project Site is currently developed with an 117,000 square-foot light manufacturing building with its associated surface parking lot to the north, east, and west of the existing on-site building. The Project Site is bordered by a perimeter fence and sliding gate at the vehicle entrance. Access onto the Project Site is limited to operational hours. The occupied floor area represents the active uses that were occupied and operational at the time the NOP was prepared. Vehicular access to the Project Site is provided via one primary driveway off of Casitas Avenue that terminates at the northeast corner of the Project Site.

### (1) Views of the Project Site

Views of the Project Site include the light manufacturing/production/warehouse building on-site and associated surface parking lot. As shown in Figure III-1, Photographs of the Project Site, Views 1-6, the primary view of the Project Site from Casitas is characterized by a six-foot high landscaped wall that screens views towards the Project Site. The surface parking lot is located to the north and east of the light manufacturing/ warehouse/film production building. An alley runs along the south side of the building and along the southern property line. Access to the Project Site is limited to one driveway on the northeast side of the Project Site that connects to Casitas Avenue. The perimeter of the Project Site is lined with a chain-link fence along the eastern and southern property lines and a cement wall along the northern and western property lines.

## 3. Surrounding Land Uses

The properties surrounding the Project Site have the General Plan land use designations of Commercial Manufacturing, Open Space, and Public Facilities. The Glendale Freeway is located to the north and west of the Project Site. The Los Angeles River is located to the south of the Project Site. A Metro-owned railway is located to the northeast of the Project Site. These three features limit access to the Project Site area from the surrounding neighborhood, as access to Project Site area is limited to Casitas Avenue. Photographs of the land uses immediately surrounding the Project Site are provided in Figure III-2, Photographs of Surrounding Uses. Detailed descriptions of surrounding land uses are provided below.

North: The Project Site is immediately bordered by a self-storage facility to the north (refer to Figure III-2, View 8 and View 9). This property is zoned [Q]MR1-1-CDO-RIO and has a land use designation of Commercial Manufacturing. Access to the self-storage facility and the Project Site is limited to Casitas Avenue. Figure III-2, Photographs of the Surrounding Land Uses shows the Project Site and the self-storage facility are surrounded by open space and public facilities that characterize the Glendale Freeway, the Los Angeles River, and the railway (See Figure II-2, Views 8, 10, 11 and 12). The Glendale Freeway (SR-2) runs in a north-south direction in the vicinity of the Project Site and is located just northwest of the self-storage facility and the Project Site, where it curves around these properties (See Figure II-2, Aerial Photograph and Photograph Location Map, in Section II, Project Description). The Glendale Freeway is located at a higher elevation than the Project Site and surrounding properties. Commercial and residential land uses are located further north of the Glendale Freeway, as shown in Figure III-2, View 7.

View 1: From the terminus of Casitas Avenue, looking south at the Project Site.

View 2: From the entrance gate to the Project Site, looking southwest at the Project Site.

View 3: From east of the Project Site, looking northwest at the Project Site.

View 4: From east of the Project Site, looking west along the southern end of the Project Site.

View 5: From the west side of the Project Site, looking northeast through the Project Site.

View 6: From the west side of the Project Site, looking northeast through the Project Site and along the northern property line.

Source: Parker Environmental Consultants, August 2016.

Figure III-1
Photographs of the Project Site
Views 1-6

View 7: From Carillon Street, looking southwest along Carillon Street with residential uses and street parking along the west side of the street.

View 8: From the terminus of Casitas Avenue, looking north along Casitas Avenue towards the adjacent self-storage facility and Glendale Freeway (SR-2).

View 9: From the east side of Casitas Avenue, looking southwest at the self-storage facility to the north of the Project Site.

View 10: From east of the Project Site, looking east through the Bowtie Project area and towards the railway and land uses east of the railway.

View 11: From east of the Project Site, looking north through the Bowtie Project area and towards the railway and land uses east of the railway.

View 12: From east of the Project Site, looking west along the Los Angeles River.

Source: Parker Environmental Consultants, August 2016.

Figure III-2
Photographs of the Surrounding Land Uses
Views 7-12

West: An elevated hill with vegetation immediately borders the northwest portions of the Project Site and the adjacent self-storage facility where the Glendale Freeway is located on. Vegetation is located immediately to the west of the Project Site along the property fence between the Project Site and the Glendale Freeway. A northbound on-ramp to the Glendale Freeway is located further west of the vegetation. Commercial and residential land uses are located further west of the Project Site on the other side of the Glendale Freeway. Refer to Figure III-2, Photographs of Surrounding Land Uses, Views 7 through 9.

South: The Los Angeles River, which runs in an east-west direction in the vicinity of the Project Site, immediately borders the Project Site to the south. Industrial uses, residential uses, and a park exist south of the Los Angeles River. A Los Angeles Department of Water and Power (LADWP) paved maintenance road and electricity transmission tower easement runs between the Project Site and the Los Angeles River south of the property fence. This easement is also utilized as a pedestrian walkway and is connected to the residential neighborhood located west of the Project Site. Refer to Figure III-2, Photographs of Surrounding Land Uses, View 12. The properties located along the west bank of the Los Angeles River are improved with industrial and residential uses and the Lewis MacAdams Riverfront Park, which includes Marsh Park. The Los Angeles River Greenway Trail is also located along the west bank of the Los Angeles River.

East: The undeveloped parcel of land located to the immediate east of the Project Site is owned and operated by California State Parks, which was previously a part of the Taylor Yard. This vacant area is currently designated as Public Facilities in the General Plan and is slated for development of a public park with naturalized, passive open space. California State Parks and the Clockshop, an arts organization, work together on the Bowtie Project, which is a collaboration of artwork and performances and currently operates on this vacant space area. A public facilities access road also branches off of Casitas Avenue and continues eastward from the Project Site area into this public facilities area. A railway is also located further east of the Project Site and runs in a northwest-southeast direction in the vicinity of the Project Site. Commercial and institutional land uses are located east of the railroad. Refer to Figure III-2, Photographs of Surrounding Land Uses, View 10 and 11.

### (1) Views of Surrounding Properties

The properties surrounding the Project Site are designated as Commercial Manufacturing, Open Space, and Public Facilities. The Glendale Freeway is located to the north and west of the Project Site. The Los Angeles River is located to the south of the Project Site. Industrial uses, residential uses, and a public park exist south of the Los Angeles River opposite the Project Site. An LADWP paved maintenance road and

electricity transmission tower easement runs between the Project Site and the Los Angeles River, south of the property fence. The Southern Pacific railway is located to the northeast of the Project Site. Aside from views of the Los Angeles River, there are no prominent viewsheds within the Project study area. Due to existing development along Casitas Avenue, there are no existing views of the River from the public right-of-way along Casitas Avenue.

### (2) Adjacent Segment of the Los Angeles River

The L.A. River Channel has multiple entities that have jurisdiction of the river channel. The California Department of Transportation (Caltrans) owns the air rights to the overhead air space above the L.A. River. The City of Los Angeles controls and monitors surface water flowing through the first 32 miles of the L.A. River. Los Angeles County Public Works and the Army Corps of Engineers (ACOE) have jurisdiction over the in-channel right-of-way as well as being responsible for channel structure integrity.

The segment of the L.A. River adjacent to the Project is vegetated with a mix of non-native species, native herb-dominated species strongly adapted to anthropogenic disturbance, and a small amount of riparian vegetation. There are limited areas of native riparian vegetation (black willow and mulefat) present within the riverbed adjacent to an active channel. However, the predominance of the riparian vegetation and the active channel of the river are located on the far side of the riverbed furthest from the Project (ranging from approximately 250 to 275 feet from the proposed Project).

## 4. Northeast Los Angeles Community Plan

The Project Site is located in the Northeast Los Angeles Community Plan Area (CPA). As shown in Figure II-3, Zoning and General Plan Land Use Designations, the Project Site has a land use designation of Heavy Manufacturing and is currently zoned as [Q]PF-1-CDO-RIO. In 2010, the City inadvertently rezoned the Project Site from M2-1 to its current zoning, which is not consistent with the Project Site's land use designation under the Community Plan.[1] The Northeast Los Angeles CPA was greatly influenced by the development of the freeway system, suburbanization, and the decentralization of commercial and industrial land uses that followed WWII. This caused the arrangement of land uses within the CPA to change, and the relationship of the CPA with the rest of the expanding metropolis to change. The Northeast Los Angeles CPA aims to preserve and enhance the character of Northeast Los Angeles by strengthening the viability and

[1] *See Parcel Profile Report and Zoning History in Appendix R to this EIR for a detailed account of the prior zoning actions and correction letter regarding the zoning designation.*

identity of its neighborhoods and communities and improving the quality of life of all its residents.

### a) Atwater Village Neighborhood Council Area and Adjacent Neighborhood Council Areas

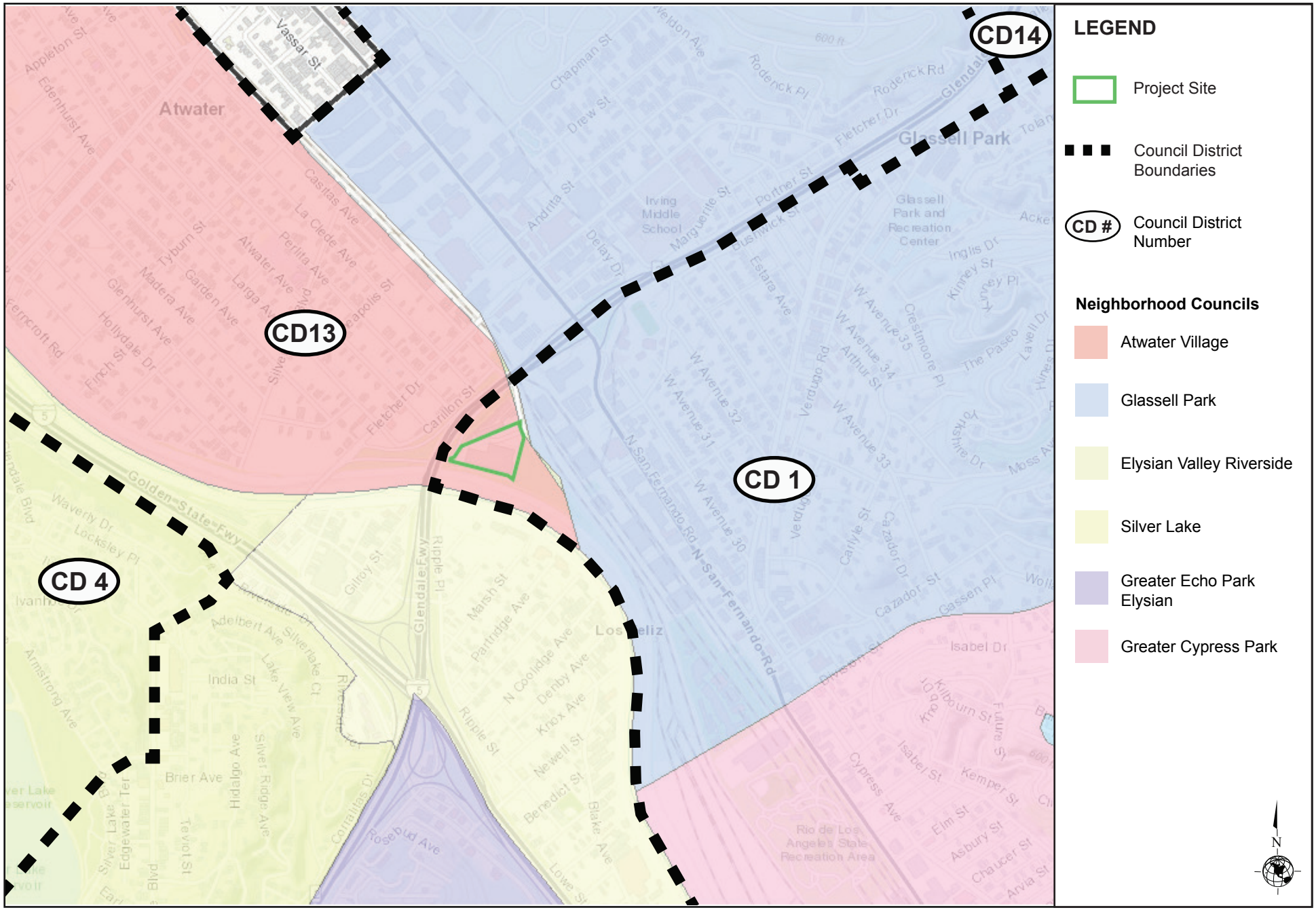
Nine neighborhoods comprise the Northeast Los Angeles CPA, which include Atwater Village, Cypress Park, Eagle Rock, El Sereno, Glassell Park, Highland Park, Lincoln Heights and Montecito Heights, Monterey Hills, and Mount Washington. As shown in Figure III-3, Council District and Neighborhood District Map, the Project Site is located within the Atwater Village Neighborhood Council area of the CPA in South Atwater. Atwater Village is in many respects the most isolated portion of the Northeast Los Angeles CPA area with respect to the rest of the CPA. Atwater Village occupies a narrow strip of level land between two major barriers, the Los Angeles River on the west and the railroad tracks on the east. The Project Site is located to the west of the Glassell Park Neighborhood Council area, and north of the Elysian Valley Riverside Neighborhood Council area.

## 5. Related Projects

Sections 15126 and 15130 of the State CEQA Guidelines require EIRs to consider the significant cumulative environmental effects of a project. “Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts [CEQA Guidelines Section 15130 (b)(1)(A)].

Based on a review of all proposed, recently approved, under construction, or reasonably foreseeable projects that have been identified within proximity to the Project Site, a total of 12 related projects were identified that have the potential to produce a cumulative impact on the local environment, when considered in conjunction with the Proposed Project. These related projects are identified in Table III-2, Related Projects, below. The project location for each related project is identified in Figure III-4, Related Projects Location Map.

In instances when the list-based analytical approach is appropriate for determining cumulative impacts, the potential cumulative impacts associated with these related projects and the Proposed Project were considered as discussed under a Cumulative Impact subheading in each respective environmental impact category in Section IV, Environmental Impact Analysis, of this EIR.




Source: City of Los Angeles, Bureau of Engineering, 2017.

Figure II-3
Council Districts and Neighborhood Districts Map

Bowtie Park Project (Related Project #15)

The 18-acre Bowtie Project Site located immediately south of and adjacent to the Project Site is a former rail yard and switching site which was purchased by California State Parks in 2003 to be developed as a public park and greenway. The Bowtie Project is curated by Clockshop, in close collaboration with California State Parks. The portion of state park adjacent to the Project has been previously graded and the substrate is currently highly compacted due to past industrial uses. As a result, this area is mostly bare, with sparse non-native trees and ruderal vegetation with areas consisting of gravel substrate. This related project is still in the early site planning stages and no specific uses or development has been identified at this time. As such it is addressed at a qualitative level within this EIR and was not included in the Project Traffic Study as the project has not yet been defined.

Taylor Yard Bikeway/Pedestrian Bridge (Related Project #16)

The Taylor Yard Bikeway/Pedestrian Bridge Over the Los Angeles River Project is located approximately 1 mile to the south of the Project Site and is proposed to connect Elysian Valley and Cypress Park across the Los Angeles River. As this bridge is intended to facilitate bikeway/pedestrian traffic and would not affect the local vehicle roadway network it was not included as a related project in the Project Traffic Study.

G2 Parcel – Taylor Yard (Related Project #17)

The City of Los Angeles purchased the Taylor Yard G2 parcel (G2) on March 1, 2017. The nearly 250-acre Taylor Yard complex, of which the G2 is derived, was historically owned by Union Pacific Railroad Company and its predecessors for rail maintenance and fueling. G2 is a Los Angeles River-adjacent, approximately 42-acre property located in the Cypress Park community of Council District 1. It is situated approximately 3,000 feet (0.56 miles) to the south of the Project Site and immediately south of the southern extent of the Future Bow Tie Parcel.

The Taylor Yard River Park Project is Project No. 165 of the City Council-adopted Los Angeles River Revitalization Master Plan, and described in the U.S. Army Corps of Engineers Los Angeles River Ecosystem Restoration Feasibility Study (also known as the ARBOR or “Area with Restoration Benefits and Opportunities for Revitalization” Study), for which the City is serving as local sponsor. G2 is situated in Reach 6 of the ARBOR Study and is adjacent to a soft-bottomed portion of the Los Angeles River. The site is a brownfield and therefore complicated by legacy contamination, but it offers the first opportunity to provide direct access to the Los Angeles River in historically-underserved communities. Taylor Yard River Park is critical to the fulfillment of the ARBOR Study goals to restore ecosystem values in and along the Los Angeles River.

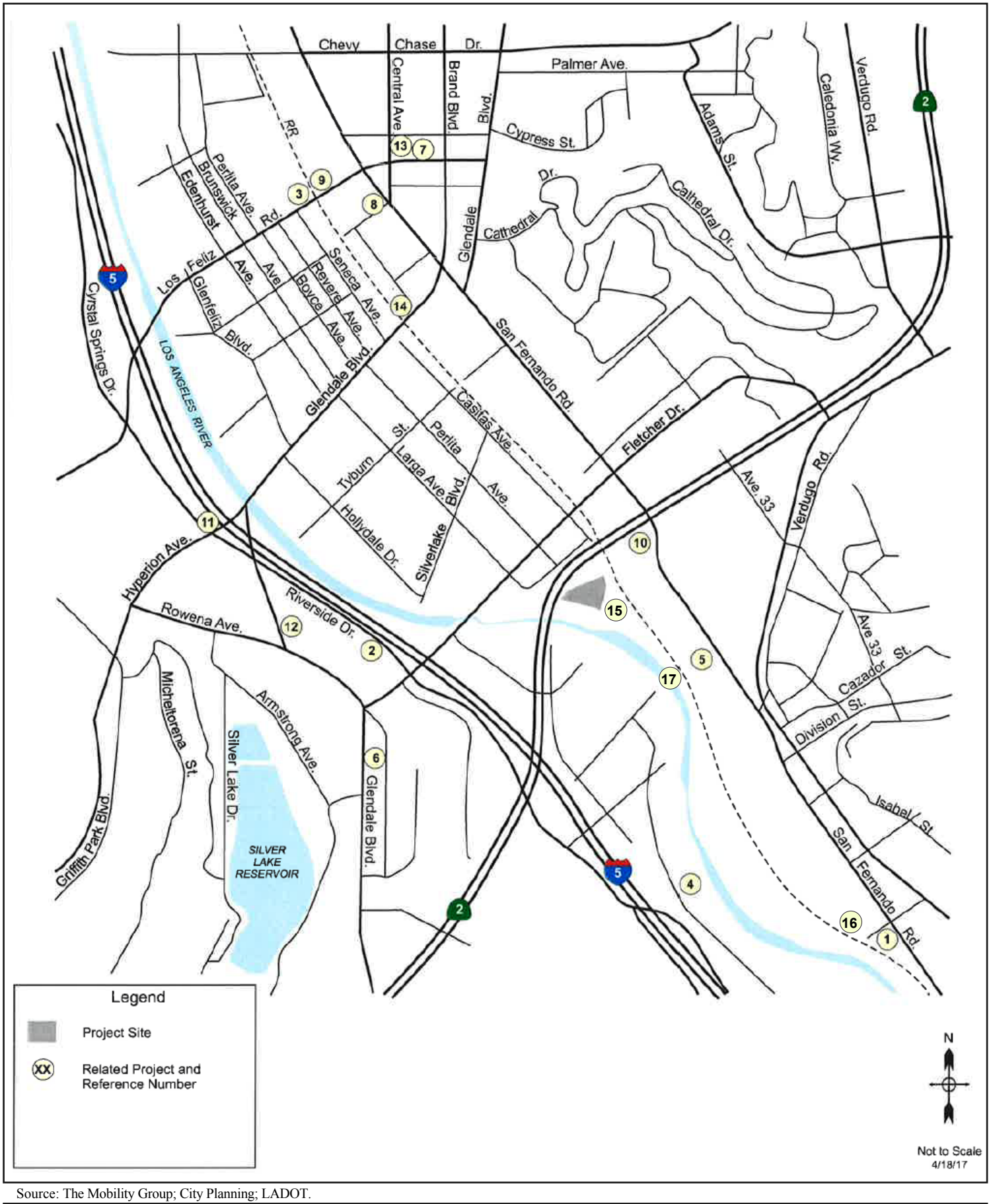
The intended scope of the G2 Project includes a phased remediation and potentially phased development including interim uses which could align with the long term goals to restore ecosystem values in and along this segment of an 11-mile corridor of the river from Griffith Park to Downtown Los Angeles. However, as this project is still in the early site planning stages, no specific uses or development has been identified at this time. Therefore, a limited qualitative description is being provided for informational purposes.

**Table III-2**
**Related Projects List**

| Project Number | Source | Project Name | Location/Address | Project Description | Size | Units |
|---|---|---|---|---|---|---|
| 1 | LADOT | Mixed-Use – Taylor Yard Village | 1555 N. San Fernando Road | Retail | 25,000 | sf |
| 2 | LADOT | 2600 Riverside Dr Condos | 2600 W. Riverside Drive | Condominiums | 120 | du |
| 3 | LADOT | New Life Vision Church | 2861 W. Los Feliz Boulevard | Church | 85,631 | sf |
| 4 | LADOT | Blake Ave Riverfront (Blake / Blimp) | 1901 W. Blake Avenue | Condominiums<br>Retail<br>Restaurant<br>Coffee / Donut Shop (No drive through) | 142<br>4,898<br>3,760<br>1,000 | du<br>sf<br>sf<br>sf |
| 5 | LADOT | Charter School | 2558 N. San Fernando Road | High School<br>Middle School<br>Elementary School | 200<br>150<br>300 | seats<br>seats<br>seats |
| 6 | LADOT | Glendale Apartments | 2468 N. Glendale Boulevard | Apartments<br>Retail | 50<br>559 | du<br>sf |
| 7 | City of Glendale | Medical Office | 129 W. Los Feliz Boulevard | Medical Office<br>Pharmacy | 24,194<br>435 | sf<br>sf |
| 8 | City of Glendale | Multi-Family / Commercial / Studio | 3901-3915 San Fernando Road | Multi-Family<br>Commercial<br>Studio | 142<br>11,600<br>5,000 | du<br>sf<br>sf |
| 9 | City of Glendale | Tropico Apartments | 435 W. Los Feliz Road | Multi-Family | 238 | du |
| 10 | LADOT | 2910 San Fernando | 2910 San Fernando Road | Condominiums | 370 | du |
| 11 | LADOT | 3061 Riverside Dr. Residential Project | 3061 Riverside Drive | Apartments | 84 | du |
| 12 | LADOT | Play Silverlake | 2828 N. Glendale Boulevard | Childcare | 175 | stu |
| 13 | City of Glendale | Medical Office | 1300 S. Central Avenue | Medical Office | 6,782 | sf |
| 14 | City of Glendale | Glendale Beeline Bus | 1749-1761 Gardena Avenue | Bus Maintenance Facility | 25,500 | sf |

| Project Number | Source | Project Name | Location/Address | Project Description | Size | Units |
|---|---|---|---|---|---|---|
| | | Maintenance Facility | | | | |
| 15 | State Parks | Bowtie Park Project | 2780 Casitas Avenue | Future Park [a] | 18 | ac |
| 16 | LABOE[b] | Taylor Yard Bikeway/Ped. Bridge Over the LA River Project | Adj. to Kerr Road and San Fernando Road | Future Bikeway and Pedestrian Route | NA | NA |
| 17 | City of Los Angeles [c] | G2 Parcel Taylor Yard | Taylor Yard | Remediation/habitat restoration/ passive parkland | 42 | acres |

*Notes:*
*du = dwelling unit, sf = square feet, emp = employee, stu = student, ac = acres*
[a] *At the time of the NOP Publication and completion of the Traffic Impact Study, California State Parks has not defined a development proposal for this site. As such, no traffic trips have been assigned to this related project.*
[b] *The Los Angeles Bureau of Engineering, December 2016.*
[c] *City of Los Angeles, http://www.tayloryardg2.com/about/resources.aspx, accessed January 2019.*
*Sources: The Mobility Group, Bow Tie Lofts Project, Draft Traffic Study, May 2017, Los Angeles Department of Transportation, and the Department of City Planning.*




Source: The Mobility Group; City Planning; LADOT.

Figure III-4
Related Project Location Map

# IV. Environmental Impact Analysis

# A. Aesthetics

## 1. Introduction

This section reviews the potential effects of the proposed Project on aesthetics, scenic resources, views and vistas, visual character, and light and glare in the Project Site area. Aesthetics generally refers to scenic resources and the character of what can be seen or overall visual perception of the environment and may include such characteristics as building height and mass, development density and design, building condition (i.e., blight), ambient lighting and illumination, landscaping, and open space. Views and vistas refer to visual access and obstruction of prominent visual features, including both specific visual landmarks and panoramic vistas. Visual character includes the different elements of the urban landscape that include the area's land use density, its mixed-use nature, building heights, lights, streetscapes, and the historic resources within the locale. Light and glare address the effects of nighttime illumination and daytime glare on adjacent land uses.

## 2. Environmental Setting

### a) Regulatory Framework

Several regulatory plans, policies, and guidance documents exist that guide development in a manner that affects the visual and aesthetic characteristics of the Project Site and surrounding area. In addition to the applicable provisions of the Los Angeles Planning and Zoning Code, which regulate setbacks, open space requirements, signage and lighting standards, and landscaping standards, the following planning documents influence the visual character of development on the Project Site and development in the proposed Project's vicinity: the City's General Plan (including the General Plan Framework and the Northeast Los Angeles Community Plan), the River Improvement Overlay (RIO) Ordinance, and the Cypress Park and Glassell Park Community Design Overlay (CDO) guidelines.

#### (1) General Plan

The City of Los Angeles General Plan (General Plan) is a comprehensive, long-range declaration of purposes, policies, and programs to guide future development and growth within the City. The General Plan is a dynamic document consisting of 11 elements, which

include a Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element/Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 Community Plans.[1]

The Citywide General Plan Framework provides several broad goals, objectives, and policies for neighborhood design with the intent that they help create a more livable city for existing and future residents and make the City more attractive for future investors. These goals and policies are stated not in terms of specific design guidelines, but in terms of general neighborhood–wide design policies. These policies include enhancing the livability of all neighborhoods through well-designed buildings, creating safe and secure public spaces, and providing attractive outdoor areas.

*(a) City of Los Angeles General Plan Framework Element*

As discussed in greater detail in Section IV.F, Land Use and Planning, of this Draft EIR, the City of Los Angeles General Plan Framework Element (Framework Element) provides direction regarding the City's vision for future development in the Project vicinity and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies general neighborhood design policies and implementation programs that guide local planning efforts. The Framework Element also states that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes a goal of creating a livable city for existing and future residents with interconnected, diverse neighborhoods. "Urban Form" refers to the general pattern of building heights and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood Design" refers to the physical character of neighborhoods and communities within the City. The Open Space and Conservation Chapter of the Framework Element calls for the use of open space to enhance community and neighborhood character. The policies of this chapter recognize that there are communities where open space and recreational resources are currently in short supply and therefore suggests that pedestrian-oriented streets might serve as important resources for serving the open space and recreational needs of residents.

[1] *City of Los Angeles, Department of City Planning, General Plan Elements, website: www.cityplanning.lacity.org, accessed October 2018.*

*(b) Conservation Element of the City of Los Angeles General Plan*

Section 15, Land Form and Scenic Vistas, of the General Plan's Conservation Element, adopted in September 2001, establishes the objective and policy for the protection of natural and scenic vistas as aesthetic resources. It is the City's policy to encourage development that would protect significant land forms and unique scenic features, such as ridgelines, bluffs, mountains, and other unique natural or geologic features. In addition, the City would also encourage, to the greatest extent practical, the preservation of public views and access to these visual resources. The Project's consistency with Section 15 of the Conservation Element and other applicable objectives and policies of the Conservation Element is provided in below.

*(c) Citywide Design Guidelines*

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City Planning Department staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were adopted by the City Planning Commission in July 2013, are intended as performance goals and not zoning regulations or development standards, and therefore do not supersede regulations in the LAMC. As stated in the Citywide Design Guidelines, although each of the Citywide Design Guidelines should be considered in a project, not all of them will be appropriate in every case, as each project will require a unique approach, and "flexibility is necessary and encouraged to achieve excellent design."[2]

The Citywide Design Guidelines are divided into three sections: (1) residential; (2) commercial; and (3) industrial. Within each section are a number of design principles and measures that address the different elements of site and building design and environmental sensitivity based on land use. Each section of the Citywide Design Guidelines is organized by overarching objectives, followed by a list of specific implementation strategies. In cases where the Citywide Design Guidelines conflict with a provision in a Community Plan Urban Design chapter or a specific plan, the community-specific requirements shall prevail.

[2] *Los Angeles Department of City Planning, Residential Citywide Design Guidelines, Multi-Family Residential & Commercial Mixed-Use Projects, July 2013, p. 5.*

### *(d) City of Los Angeles Walkability Checklist*

The City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability Checklist) is part of a proactive implementation program for the urban design principles contained in the Urban Form and Neighborhood Design Chapter of the Framework Element. City Planning Department staff use the Walkability Checklist in evaluating a project's entitlement applications and in making findings of conformance with the policies and objectives of the General Plan and the local community plan. The Walkability Checklist is also intended to be used by architects, engineers, and community members to create enhanced pedestrian movement, access, comfort, and safety, thereby contributing to improving the walkability of the City. The City Planning Commission adopted the Walkability Checklist in 2007 and directed that it be applied to all projects seeking discretionary approval for new construction. The final Walkability Checklist was completed in November 2008.[3]

### *(e) Northeast Los Angeles Community Plan*

The Project Site is located within the Atwater Community within the Northeast Los Angeles Community Plan (Community Plan) area of the City of Los Angeles. The Community Plan area (CPA) was greatly influenced by the development of the freeway system, suburbanization, and the decentralization of commercial and industrial land uses that followed WWII. This caused the arrangement of land uses within the CPA to change, and the relationship of the CPA with the rest of the expanding metropolis. The Community Plan aims to preserve and enhance the character of Northeast Los Angeles by strengthening the viability and identity of its neighborhoods and communities (such as the Atwater Village Community where the Project Site is located) and improving the quality of life of all its residents.[4]

The General Plan land use designation for the Project Site is Heavy Manufacturing. While a detailed analysis of the Project's consistency with the applicable land use regulations of the Community Plan are more appropriately discussed in Section IV.F. Land Use and Planning, the Project Site is located within the Cypress Park and Glassell Park CDO and the RIO Districts. The Cypress Park and Glassell Park CDO and the RIO District provide specific design regulations governing new development within their respective overlay areas. As such, the following discussion addresses the specific design regulations of the CDO and the RIO District Overlay as they pertain to aesthetics and urban form.

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[3] *City of Los Angeles Department of City Planning, Walkability Checklist Guidance for Entitlement Review, November 2008.*

[4] *City of Los Angeles Department of City Planning, Northeast Los Angeles Community Plan, June 15, 1999.*

*(f) Cypress Park and Glassell Park Community Design Overlay*

The CDO District encompasses the area roughly bounded by the City of Glendale to the north, the Los Angeles River to the west, the Pasadena Freeway to the south, and Mount Washington hillside area and York Boulevard to the east.[5] The CDO, effectuated by Ordinance No. 180,561 in April 2009, provides guidelines and standards for public and private development projects within the District boundaries. The intent of the CDO is to provide guidance and direction in the design of new buildings and the exterior remodeling and restoration of existing homes, buildings and storefronts that contribute to the area's revival as an attractive and vital business district and walkable and desirable residential neighborhood. In addition, the CDO aims to protect the culturally and historically significant resources in the area.

The CDO Design Guidelines and Development Standards exist as a framework for development in the CDO District, and development standards set forth requirements that bring about compliance with portions of the design guidelines. The CDO Design Guidelines and Development Standards address site planning, building design, architectural features, landscaping, signs and mechanical equipment for commercial, residential, and industrial projects. The CDO Design Guidelines and Development Standards state that whenever the provisions of the CDO are in conflict with the provisions of the RIO, those plans shall supersede the CDO. However, projects shall still require review for compliance with the CDO for those provisions not addressed within the RIO. Further, the CDO Design Guidelines and Development Standards state that wherever provisions of the CDO conflict with provisions of the Los Angeles Municipal Code (LAMC) and any ordinance therein, the LAMC shall supersede the CDO unless an ordinance, such as a qualifying condition (e.g., the [Q] condition on the Project Site), has been adopted to support the provision of the CDO.[6]

*(g) River Improvement Overlay*

Effectuated by Ordinance Nos. 183,144 and 183,145 in August 2014, the RIO District enables to City of Los Angeles to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City's boundaries. The RIO District is a proposed special use district that requires new development projects to follow and implement applicable development regulations and design guidelines. The purpose of the RIO District is to support the goals of the Los Angeles River Revitalization Master

[5] *City of Los Angeles Department of City Planning, Cypress Park & Glassell Park Community Design Overlay: Design Guidelines and Development Standards (Ordinance No. 180,561), effective April 6, 2009.*

[6] *City of Los Angeles Department of City Planning, Cypress Park & Glassell Park Community Design Guidelines: Design Guidelines and Development Standards, April 6, 2009.*

Plan (LARRMP); contribute to the environmental and ecological health of the City's watersheds; provide native habitat and support local species; establish a positive interface between the Los Angeles River and adjacent properties; promote pedestrian, bicycle and other multi-modal connections between the river and surrounding neighborhoods; provide an aesthetically pleasing environment; provide safe, convenient access to and along the river, promote river identity; and support the City's stormwater ordinances and programs.[7]

The LARRMP, which was passed in April 2007, focuses on the Los Angeles River and its surrounding communities in an effort to revitalize the Los Angeles River, green neighborhoods, capture community opportunities, and create value. The RIO would support the LARRMP by promoting sustainable environments and providing design guidelines. Currently, the Los Angeles River Design Guidelines are in draft form.[8] Ordinance No. 183,145 (RIO Ordinance) establishes development regulations that address landscaping, screening/fencing, and exterior site lighting. Moreover, the proposed Project is located within the "inner core," which includes properties adjacent to the River. Additional regulations pertaining to landscape buffers, fencing and fence heights, gates, noise, and river access also apply to properties within the inner core. Ordinance No. 183,145 additionally establishes a process for the City Planning Commission to adopt River Design Guidelines.

*(h) Lighting Regulations*

As discussed above, the RIO Ordinance establishes standards for exterior site lighting. The RIO Ordinance states:

1. All site and building-mounted lighting shall be designed such that it produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the site. No more than 5.0 percent of the total initial designed lumens shall be emitted at an angle of 90 degrees or higher from nadir (straight down).

2. All low pressure sodium, high pressure sodium, metal halide, fluorescent, quartz, incandescent greater than 60 watts, mercury vapor, and halogen

[7] *City of Los Angeles, Urban Design Studio, Fact Sheet. http://urbandesignla.com/resources/RiverDesignGuidelines.php, accessed April 2019.*

[8] *The most recent version of the Los Angeles River Design Guidelines is dated July 29, 2015 and is accessible at the following link: http://urbandesignla.com/resources/docs/RiverDesignGuidelines/hi/RiverDesignGuidelines.pdf, accessed April 2019.*

fixtures shall be fully shielded in such a manner as to not exceed the limitations discussed under Item 1.

In addition to these regulations, the proposed Project is subject to the applicable regulations of the LAMC, including the following regulations:

**Chapter 1, Article 2, Sec. 12.21 A 5(k).** All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.

**Chapter 1, Article 7, Sec. 17.08 C.** Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.

The City of Los Angeles Bureau of Street Lighting maintains a list of general street lighting issues which would be applicable to the proposed Project, addressing the need for determination of roadway and sidewalk illumination levels in accordance with Illuminating Engineers Society (IES) standards and adopted City standards; the necessity for equipment testing and approval of the Bureau of Street Lighting; mandatory street tree placement at least 20 feet from existing or proposed streetlights; and the minimization of glare and light impacts on private off-site property.

Building permits must be obtained from the City of Los Angeles Department of Building and Safety (LADBS) for any proposed signs, and electrical permits must be obtained for signs illuminated by electrical lighting. Specific LAMC requirements and restrictions are dependent on signage type, design, construction, materials, and potential for hazard to traffic.

### (2) LAMC Section 91.8104

LAMC Section 91.8104 stipulates provisions for the basic maintenance and repair of existing buildings and premises. As it generally pertains to aesthetics, this section of the LAMC contains specific provisions to ensure every existing building, structure, or portion thereof is maintained in a safe and sanitary condition and good repair and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material.

### (3) California Code of Regulations, Title 24

Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code, consists of regulations to control building standards throughout the State. The following components of Title 24 include standards related to lighting:

*(a) California Building Code and California Electrical Code*

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for pedestrian pathways, circulation ways, and paths of egress.

*(b) California Energy Code*

The California Energy Code (CEC; Title 24, Part 6) provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment. CEC Section 130.2 specifies requirements for outdoor lighting controls and luminaire cutoff requirements. All outdoor luminaires rated above 150 watts shall comply with the backlight, up light, and glare (BUG) ratings in accordance with Illuminating Engineering Society (IES) Technical Memorandum (TM)-15-11, Addendum A, and shall be provided with a minimum of 40 percent dimming capability activated to full on by motion sensor or other automatic control. This requirement does not apply to street lights for the public right-of-way, signs, or building façade lighting.

CEC Section 140.3 sets solar reflectance criteria for non-residential buildings and high rise residential buildings.

CEC Section 140.7 sets forth outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by Lighting Zone, as defined in CEC Section 10-114. Under Section 10-114, all urban areas within California are designated as Lighting Zone 3. Additional allowances are provided for building entrances or exits, outdoor sales frontage, hardscape ornamental lighting, building façade lighting, canopies, outdoor dining, and special security lighting for retail parking and pedestrian hardscape.

CEC Section 130.3 stipulates sign lighting controls with any outdoor sign that is on both day and night must include a minimum 65 percent dimming at night. CEC Section 140.8 sets forth lighting power density restrictions for signs.

*(c) California Green Building Standards Code*

The California Green Building Standards Code (Title 24, Part 11) is commonly referred to as the CALGreen Code. The CALGreen Code stipulates maximum allowable light levels, efficiency requirements for lighting, miscellaneous control requirements, and light trespass requirements for electric lighting and daylighting. Paragraph 5.1106.8 Light Pollution Reduction, specifies that all non-residential outdoor lighting must comply with the following:

- The minimum requirements for Lighting Zones 1–4 as defined in Chapter 10 of the California Administrative Code; and BUG ratings as defined in the IES TM-15-07; and Allowable BUG ratings not exceeding those shown in Table A5.106.8 in Section 5.106.8 of the CALGreen Code; or
- Comply with a local ordinance lawfully enacted pursuant to Section 101.7, whichever is more stringent.

## b) Existing Conditions

### (1) Existing Visual Characteristics and Views

A view refers to direct and unobstructed line-of-sight to an on- or off-site aesthetic resource, which may take the form of panoramic viewpoints from particular vantages. The available viewshed or visible landscape within a given field of view is defined by physical elements that occupy a viewer's line-of-sight from a particular location. Existing views may be obstructed or blocked by modification of the environment (e.g., grading, landscaping, building construction, etc.). Conversely, modifications to the existing environment may create or enhance view opportunities.

Public views are those that can be seen from vantage points which are publicly accessible, such as streets, freeways, parks, and vista points. The adjacent State Route 2 (SR-2 or Glendale Freeway) and public street, Casitas Avenue, are not identified as scenic routes.[9] These views are generally available to a greater number of persons than are private views. Private views are those that are only available from vantage points located on private property. Private views across adjacent land uses are generally not protected unless specifically governed through an adopted General Plan, Specific Plan, or view preservation ordinance.[10] Therefore, private views are not considered to be impacted if an adjacent land use blocks such views, especially if the project is within the zoning and design guidelines designated for the project site.

#### *(a) Views of the Project Site*

The Project Site is located within an urbanized area within the City of Los Angeles. The Project Site is comprised of one parcel, approximately 248,190 square feet in lot area, and is developed with an approximately 117,000-square-foot light manufacturing building and its associated surface parking lot. Figure IV.A-1, Aerial Photograph and Photograph

[9] *City of Los Angeles, Department of City Planning, Mobility Plan 2035: An Element of the General Plan, Citywide General Plan Circulation System Map A5 – Central, East and Cornfield Arroyo Seco Plan Subarea, December 2015, website: http://planning.lacity.org/documents/policy/mobilityplnmemo.PDF, accessed September 2016.*

[10] *Mira Mar Mobile Community v. City of Oceanside (CH Oceanside) (2004) 119 Cal.App.4th 477.*

Sources: Parker Environmental Consultants, August 2016; and Google Earth, Aerial View, February 2016.

Figure IV.A-1
Aerial Photograph and Photograph Location Map

Location Map, shows an aerial view of the Project Site and photograph locations. Figure IV.A-2, Photographs of the Project Site Views 1-4, Figure IV.A-3, Photographs of the Project Site Views 5-8, and Figure IV.A-4, Photographs of the Project Site from the SR-2 Freeway, show views of the Project Site from various vantages in the project vicinity. Views 1 and 2 show views of the Project Site from Casitas Avenue. Views show the light manufacturing building on-site and associated surface parking lot. The surface parking lot is located to the north and east of the light manufacturing building. Views 5 and 7 show an alley that runs along the south side of the building and along the southern property line. Views 9 through 12 depict existing views available from the SR-2 freeway from the west bank of the Los Angeles River, midway across the SR-2 bridge over the Los Angeles River and the SR-2 northbound on-ramp adjacent to the Project Site. Access to the Project Site is limited to one driveway on the northeast side of the Project Site that connects to Casitas Avenue. The perimeter of the Project Site is lined with a chain-link fence along the eastern and southern property lines and a cement wall along the northern and western property lines.

*(b) Views of Surrounding Properties*

The properties surrounding the Project Site are designated as Commercial Manufacturing, Open Space, and Public Facilities. SR-2 is located to the north and west of the Project Site. The Los Angeles River is located to the south of the Project Site. The Southern Pacific railway is located to the northeast of the Project Site. Photographs of the land uses immediately surrounding the Project Site beyond its defined borders are provided in Figure IV.A-5, Photographs of Surrounding Uses Views 13-16, and Figure IV.A-6, Photographs of Surrounding Uses Views 17-20. A detail description of surrounding land uses is provided below:

North: The Project Site is immediately bordered by a self-storage facility to the north. This northerly adjacent property is zoned [Q]MR1-1-CDO-RIO and has a General Plan land use designation of Commercial Manufacturing. Views 11 and 12 in Figure IV.A-5 show the two-story (approximately 25 feet in height) self-storage facility. Access to the self-storage facility is limited to Casitas Avenue. As shown in Figure IV.A-1, the Project Site and the self-storage facility property are surrounded by open space and public facilities that characterize the SR-2 corridor, the Los Angeles River, and the railway. SR-2 runs in a north-south direction in the vicinity of the Project Site and is located just north and west of the self-storage facility and the Project Site. Commercial and residential land uses are located to the west side of SR-2. No scenic views exist looking north from the Project Site.

View 1: From the terminus of Casitas Avenue, looking south at the Project Site.

View 2: From the entrance gate to the Project Site, looking southwest at the Project Site.

View 3: From the east side of Project Site, looking south at the Project Site.

View 4: From east of the Project Site, looking northwest at the Project Site.

Source: Parker Environmental Consultants, August 2016.

Figure IV.A-2
Photographs of the Project Site
Views 1 - 4

View 5: From the east of the Project Site, looking west along the southern portion of the Project Site.

View 6: From the north side of the Project Site, looking southwest through the Project Site and along the northern proeprty line.

View 7: From the west side of Project Site, looking east at the southern portion of the Project Site.

View 8: From the west side of the Project Site, looking northeast through the Project Site and along the northern property line.

Source: Parker Environmental Consultants, August 2016.

Figure IV.A-3
Photographs of the Project Site
Views 5 - 8

View 9: From the SR-2 Freeway over the L.A. River looking east the the Project Site.

View 10: From the SR-2 Freeway over the L.A. River looking northeast at the Project Site.

View 11: From the SR-2 on-ramp looking east at the Project Site.

View 12: From the SR-2 on-ramp looking southeast the Project Site.

Source: City of Los Angeles, Department of City Planning, 2019.

Figure IV.A-4
Photographs of Project Site from the SR-2 Freeway
Views 9-12

View 13: From east of Casitas Avenue, looking southwest along the Carillon Avenue.

View 14: From the west side of Casitas Avenue, looking southeast at the properties and the railway to the east of the Project Site.

View 15: From the terminus of Casitas Avenue, looking north along Casitas Avenue towards the adjacent self-storage facility and Glendale Freeway (SR-2).

View 16: From the east side of Casitas Avenue, looking southwest at the self-storage facility to the north of the Project Site.

Source: Parker Environmental Consultants, August 2016.

Figure IV.A-5
Photographs of Surrounding Land Uses
Views 13 - 16

View 17: From east of the Project Site, looking north through the State Park parcel and towards the railway and land uses east of the railway.

View 18: From east of the Project Site, looking southeast through the State Park parcel and along the Los Angeles River.

View 19: From east of the Project Site, looking southwest along the Los Angeles River towards the Glendale Freeway (SR-2).

View 20: From the west side of Project Site, looking north towards the self-storage facility and to the shurbbery west of the Project Site.

Source: Parker Environmental Consultants, August 2016.

Figure IV.A-6
Photographs of Surrounding Land Uses
Views 17 - 20

West: An on-ramp to SR-2 immediately borders the Project Site to the west. Commercial and residential land uses are located to the west side of SR-2. Shrubbery conceals the view of the on-ramp from the Project Site. Refer to Figure IV.A-3, View 8 and Figure IV.A-6, View 20. No scenic views exist looking west from the Project Site.

South: The Los Angeles River is located to the south of the Project Site and runs adjacent to the Project Site's southern property line. Industrial and residential uses exist south of the Los Angeles River. A maintenance road and electricity transmission easement owned by the Los Angeles Department of Water and Power (LADWP) are located between the Project Site and the Los Angeles River to the south. This road is also utilized by pedestrians and connects to the residential neighborhood located to the west of the Project Site. Additionally, the Los Angeles River Greenway Trail runs along the south side of the Los Angeles River. The Los Angeles River Greenway Trail is a public recreation trail that parallels the Los Angeles River. An elevated view of the Project Site from above the Los Angeles River Greenway Trail at the SR-2 overpass is depicted in Figure IV.A-4, View 9. Industrial, residential uses and the Lewis MacAdams Riverfront Park, which includes Marsh Park, exist south of the Los Angeles River and the Los Angeles River Greenway Trail. Refer to Figure IV.A-6, Views 18 and 19.

East: Previously developed, vacant land zoned for public facilities is located to the east of the Project Site. California State Parks owns this vacant land, which was previously a part of the Taylor Yard, a 242-acre former rail yard site located on the Los Angeles River, just north of Elysian Park and the I-5/Arroyo Seco Parkway intersection. This vacant area is slated for development of a public park. California State Parks and the Clockshop, an arts organization, work together on the Bowtie Project, which is a collaboration of artwork and performances and currently operates on this vacant area. A public facilities road branches off of Casitas Avenue and continues eastward from the Project Site area through the State Park property. The Southern Pacific railway is also located east of the Project Site and runs in a northwest-southeast direction in the vicinity of the Project Site. Commercial and institutional land uses are located east of the railway. Refer to Figure IV.A-5, View 14. No scenic views exist looking east from the Project Site.

Aside from views of the Los Angeles River, there are no prominent viewsheds within the Project study area. Due to development along Casitas Avenue, there are no existing views of the Los Angeles River from the public right-of-way along Casitas Avenue. Views of the surrounding area are depicted in Figures IV.A-5 and IV.A-6.

## (2) Artificial Light and Glare

### *(a) Artificial Light*

The term “artificial light” in this analysis refers to man-made evening and nighttime light. Artificial light sources are generally of two types, including: (1) point sources of light, which include unshielded light sources (e.g., lenses or lamp reflectors); and (2) illuminated surfaces, which may include light reflected off of the ground, walls, or trees. Pursuant to the L.A. CEQA Thresholds Guide (Thresholds Guide), light-sensitive land uses are uses that light has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime vicinity. Residential uses are considered light-sensitive because they are typically occupied during the evening hours and are occupied by persons who have expectations of privacy. Artificial light sources can be potentially invasive and interfere with residential privacy by intruding into an individual’s living environment, disrupting evening views, and potentially changing neighborhood character. Additional light-sensitive land uses may include, but are not limited to, board and care facilities, commercial or institutional uses that require minimal nighttime illumination for proper function, physical comfort, or commerce and natural areas. Light-sensitive uses surrounding the Project Site include the Los Angeles River and the River House (a multi-family residential development that borders the south side of the River across from the Project Site).

Artificial light impacts are of two types: (1) aesthetics and (2) exposure. Light aesthetics refers to a viewer’s general aesthetic perception of light sources and their environment and focuses on the visual changes, which take place as seen by an individual. Light aesthetics are evaluated based on the following criteria:

- Changes in sky glow (the general white-to-orange glow that emanates from large expanses of lit areas, such as cities). Substantial (i.e., highly noticeable) increases in sky glow could impact nighttime aesthetics by reducing the clarity of the night sky;
- Proximity to light sources (i.e., a lit area within close proximity to a certain location would have a greater impact upon that location than a lit area further away); and
- Changes in large areas from unlit to lit conditions.

Light exposure refers to the quantity of light, or light intensity, emitted by light sources and received by an individual.

Existing light sources in the vicinity of the Project Site include the passing of vehicles on the on-ramp to SR-2, SR-2 to the west of the Project Site, intermittent vehicle traffic on Casitas Avenue, and trains traveling intermittently on the railway to the east of the Project

Site. The Project Site is immediately surrounded by commercial, manufacturing, open space, and vacant land. The commercial and manufacturing land uses generally operate during the day and create minimal nighttime lighting. There is little nighttime lighting in the immediate vicinity of the Project Site with the exception of security lighting and street lighting. Multi-family residential development (the River House condominiums located at 2943 N. Glendon Street) exists on the south side of the Los Angeles River across from the Project Site and provides distant light sources from light emanating from residential windows. As such, a relatively low degree of ambient lighting currently exists in the Project area.

*(b) Glare*

Glare is a common phenomenon existing in urbanized areas. Glare is a lighting condition that causes an observer to experience visual discomfort as a result of high brightness. Glare is a common occurrence in urbanized areas that can be caused by either: (1) the reflection of the sun off reflective surfaces during the day (i.e., daytime glare); or (2) the reflection of artificial light sources (i.e., automobile headlights, special events lighting) off reflective surfaces at night (i.e., nighttime glare). Excessive glare restricts visibility and increases the ambient heat reflectivity (i.e., albedo) in a given area.

The generation of substantial amounts of daytime glare is dependent on two factors: (1) the presence of buildings, signs, or thematic elements that include reflective building materials (i.e., glass and metals) which provide the opportunity for sunlight to reflect; and (2) the location of such uses in highly visible areas. "Highly visible areas" include areas where all of the following apply: (1) the glare source is within close proximity to a glare-sensitive use; (2) the glare-sensitive use has a direct and unobstructed line-of-site of the glare source; and (3) the glare source is located north, east, or west of the glare-sensitive use. Due to the latitude of the City of Los Angeles, the sun does not create glare on north-facing façades.

The generation of substantial amounts of nighttime glare is dependent on the same factors as is the generation of daytime glare (i.e., buildings, signs, or thematic elements that include reflective materials and location of such uses in highly visible areas). Lighting may also result in nighttime glare. Nighttime glare can be generated in any direction, so long as the glare sources (e.g., reflective buildings, and glare-sensitive uses), are within close proximity (several hundred feet) to one another. The City has not adopted any policies to address the measurement or occurrence of reflective glare impacts. The determination of significance is generally subjective and relative to existing conditions. Adopted policies regarding contrasting light foot-candles (light intensity), however, can be applicable to bright signage in residential areas. Such policies are generally applicable in areas that are zoned for off-site advertising.

The Project Site is currently developed with a light manufacturing building and its associated surface parking lot. The current building generally results in relatively low levels of daytime glare. Sources of glare on-site are associated with reflection from vehicles parked on-site and the building's windows. Glare is also generated from vehicles passing on SR-2 and Casitas Avenue and vehicles that are parked on surrounding properties.

# 3. Project Impacts

## a) Thresholds of Significance

### (1) State CEQA Guidelines Appendix G

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to aesthetics if it would:

***Threshold (a): Have a substantial adverse effect on a scenic vista; or***

***Threshold (b): Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; or***

***Threshold (c): Substantially degrade the existing visual character or quality of public views of the site and its surroundings. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or***

***Threshold (d): Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The Thresholds Guide identifies the following criteria to evaluate aesthetics:

*(a) Scenic Vistas*

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished;

- The amount of natural open space to be graded or developed;

- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.;
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image; and
- The degree to which the project would contribute to the area's aesthetic value.

*(b) Scenic Resources within a State Scenic Highway*

- Whether the project affects views from a designated scenic highway, corridor, or parkway;
- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

*(c) In urbanized areas, conflict with applicable zoning and other regulations governing scenic quality*

- Applicable guidelines and regulations.

*(d) Light/Glare*

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

# b) Methodology

## (1) Scenic Vistas

The analysis of scenic vistas evaluates the changes to existing views that may result from development of the Project. The purpose of the analysis is to determine if valued scenic resources are visible in the Project area and whether visual access to such resources would be blocked or diminished as a result of the Project. In general, views are closely

tied to topography and distance from a scenic resource. The identification of available views within the Project area was accomplished through field surveys, photographic documentation, and topographic analysis. The analysis is based on the Project's characteristics, and a review of the proposed Project's building elevations and cross sections, as evaluated from a variety of directions relative to the Project Site. To determine whether a potential view impact would occur, a five-step process is used to weigh several considerations, as follows:

- Step 1: Define the view resources that could be affected by Project development.
- Step 2: Identify the potential obstruction of valued view resources as a result of development of the Project Site.
- Step 3: Evaluate whether a potential obstruction would substantially alter the view. The "substantiality" of an alteration in views is somewhat subjective and dependent on many factors. In this case, an obstruction in the view of a particular view resource is considered substantial if it exhibits all of the following traits: (1) the area viewed contains a valued view resource; (2) the obstruction of the resource covers more than an incidental/small portion of the resource; and (3) the obstruction would occur from a public vantage point.
- Step 4: Consider whether the Project includes design features that offset the potential alteration or loss of views of a particular view resource.
- Step 5: Consider whether the view blockage is permanent, as viewed from a scenic vantage point; or whether the blockage would be of limited duration, such as when viewed from a moving vehicle or temporary blockages associated with construction activities.

### (2) Scenic Resources

As described in detail below, the Project Site does not include any scenic resources, nor is the Project Site located adjacent to a scenic highway. As such, no further analysis is required.

### (3) Conflict With Regulations Governing Scenic Quality

The Project Site is located in an urbanized area. As such, in accordance with threshold I,c. of Appendix G of CEQA Guidelines, the analysis discusses whether the proposed Project would conflict with regulations regarding scenic quality. The determination of whether the proposed Project conflicts with any applicable regulations governing scenic quality is based upon a review of the previously identified planning and zoning documents

that pertain to scenic quality. These include the City of Los Angeles General Plan Framework Element and Conservation Element, the Citywide Residential Design Guidelines, the City of Los Angeles Walkability Checklist, the Northeast Community Plan, the Cypress Park and Glassell Park CDO Design Guidelines, the RIO District Design Guidelines, and the applicable provisions of the LAMC.

CEQA Guidelines Section 15125(d) requires that EIRs discuss any inconsistencies with applicable plans. A project is considered consistent with the provisions and general policies of an applicable City or regional plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy.[11] More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

### (4) Light and Glare

The analysis of light and glare identifies the location of off-site light- and glare-sensitive land uses and describes the existing ambient lighting conditions in the Project area. The analysis evaluates the Project's proposed light and glare sources and the extent to which Project lighting may spill off the Project Site onto off-site light-sensitive uses. The analysis also describes the affected street frontages, the direction in which light would be focused, and the extent to which the Project would illuminate off-site sensitive land uses. In addition, the analysis considers the potential for sunlight to reflect off of building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities.

## c) Project Design Features

The following Project Design Features are applicable to the Project.

**Project Design Feature AES-PDF-1:** Temporary construction fencing will be installed around the perimeter of the Project Site prior to demolition work to secure the site and block unsightly views of construction debris and equipment. The Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or

[11] *Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.*

graphic treatment) throughout the construction period. Site maintenance and graffiti removal shall comply with LAMC Sections 91.3306, 91.3307, and 91.8104.15 of the LAMC.

**Project Design Feature AES-PDF-2:** The proposed Project shall include low-level directional lighting at the ground and podium levels of the exterior of the proposed structures to reduce light spillover onto adjacent properties.

**Project Design Feature AES-PDF-3:** The proposed Project's façades and windows shall be constructed of non-reflective materials (e.g., minimize the use of glass with mirror coatings) such that glare impacts on surrounding properties and roadways are minimized. Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

**Project Design Feature AES-PDF-4:** On-site utilities that serve the proposed Project shall be installed underground, as recommended by the Los Angeles Department of Building and Safety and the Los Angeles Department of Water and Power.

**Project Design Feature AES-PDF-5:** Mechanical, electrical, roof-top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), and trash enclosures, will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way.

## d) Project Impacts

***Threshold (a): Would the project have a substantial adverse effect on a scenic vista?***

As discussed in Section VI.D, Effects Not Found to be Significant, and in the Initial Study (Appendix A), there are no available views of the Los Angeles River at the surface level at any point on or through the Project Site as views are blocked by an existing raised earthen berm along the Project Site's western property line. Similarly, views of the mountains to the west through the Project Site are blocked by the existing 117,000-square-foot light manufacturing/warehouse/film production building. The elevated SR-2 blocks views of the mountains to the northeast through the Project Site.

With respect to scenic views from the SR-2 and the Los Angeles River Greenway Trail, the proposed Project would be located in approximately the same building footprint as the existing light manufacturing/warehouse/film production building that is currently on-site. The new mixed-use buildings would be a maximum of 85 feet in height, whereas the existing light manufacturing/warehouse/film production building is approximately 40 feet in height. However, as seen in Figure, IV.A-4, Views 9 through 12, the construction of a taller building in the same general footprint as the existing building would not adversely

impact any scenic view from these vantages as the Project Site is located over 500 feet away and is not the primary or focal viewpoint. Additionally, the proposed structure would occur in the background of the primary Los Angeles River viewshed and would not block any scenic vistas. ***Therefore, the proposed Project would have no impact with respect to scenic vistas, and no further analysis is required.***

***Threshold (b): Would the project substantially damage scenic resources, including, but not limited, to trees, rock outcroppings, and historic buildings within a state scenic highway?***

As discussed in Section VI.D, Effects Not Found to be Significant, and in the Initial Study (Appendix A), there are no scenic resources on the Project Site. In addition, there are no historic resources on the Project Site, and the Project Site is not located within the viewshed of a designated scenic highway.[12] As discussed in Section IV.M, Biological Resources, there are no protected tree species on the Project Site. ***Therefore, the proposed Project would have no impact with respect to Threshold (b). No impacts to scenic resources including, but not limited, to trees, rock outcroppings, and historic buildings within a state scenic highway, would occur, and no further analysis is required.***

***Threshold (c): If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

(1) Impact Analysis

*(a) Construction*

Construction of the proposed Project would alter the existing visual setting and character of the Project Site on a temporary basis throughout the duration of the construction period. During the proposed Project's construction period, the Project Site would undergo considerable changes with respect to the aesthetic character of the Project Site and surrounding area. The existing 117,000-square-foot light manufacturing/warehouse/film production structure would be demolished and replaced with the new construction of a mixed-use project with up to 419 multi-family dwelling units and up to 64,000 square feet of commercial land uses. Construction activities would create construction debris and soil stockpiles, staged building materials and supplies, and construction equipment, all of which could occupy the field of view of persons along the pedestrian paths along the Los Angeles River, passing motorists on SR-2 and Casitas Avenue, and neighboring properties. However, the appearance of the Project Site during construction would be

[12] *City of Los Angeles General Plan, Mobility Plan 2035, Appendix B, Inventory of Designated Scenic Highways and Guidelines.*

typical of construction sites in urban areas. Furthermore, construction would be temporary in nature, and the visual impacts associated with construction activities would cease upon completion of the construction of the Project.

Overall, while construction would alter the visual character of the Project area on a temporary basis, Project construction activities would not substantially alter or degrade the existing visual character and quality of the Project Site and its surroundings or introduce elements that generate substantial long-term contrast with or substantially detract from visual character of the surrounding area for the following reasons: (1) views of Project construction activities would be limited in duration and location; (2) the appearance of the Project Site would be typical of construction sites in urban areas; and (3) construction would occur within an urban setting with a high level of human activity and development. As noted above under Project Design Feature AES PDF-1, as part of the construction process the developer would install a temporary fencing around the perimeter of the Project Site for security purposes and to block views of the Project Site from the pedestrian level. Installation of temporary fencing and compliance with the applicable regulatory measures would further reduce visual impacts caused during the construction of the proposed Project. For example, temporary signs on temporary construction walls shall comply with the construction requirements of LAMC Section 14.4.16 E. Pursuant to LAMC Section 91.6205, the Applicant is also responsible for maintaining the visibility of the required signage and for maintaining a construction barrier free and clear of any unauthorized signs and graffiti. Compliance with these regulatory measures would reduce visual impacts during construction to a less-than-significant level.

*(b) Operation*

*i. General Plan Framework Element*

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project would enhance the built environment and upgrade the quality of development by replacing a large non-descript light manufacturing/warehouse/film production building with a mixed-use development with residential, office and commercial restaurant uses within the Los Angeles River corridor. The Project would encourage pedestrian activity through the Project Site by creating a pedestrian-friendly site plan that affords access along the Los Angeles River frontage and connectivity to the future State Park property to the south. As such, the proposed Project would be consistent with the goal of creating a livable city for existing

and future residents with interconnected, diverse neighborhoods. Further, the Project would also include on-site open space areas within a courtyard setting and landscaping that would activate the outdoor environment for residents and visitors. All utilities on the Project Site would be placed underground.

The proposed Project would also be consistent with Objective 5.9, which encourages proper design and effective use of the built environment to help increase personal safety at all times of the day. As a mixed-use residential, office and restaurant spaces, the Project would facilitate observation and natural surveillance through improved pedestrian friendly common areas, adequate lighting, and would incorporate the use of landscaping as a natural barrier. The proposed site plan provides for good visual connections between residential, commercial, and public environment along the LA River corridor and proposed public park space to the south. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

*ii. Conservation Element*

The proposed Project would result in the redevelopment of an infill site that is currently developed with a 117,000 square foot light manufacturing/warehouse/film production building and surface parking. The proposed new mixed-use buildings would be located within the same general footprint as the existing structure and, as such, would not substantially alter existing views. The proposed Project would be consistent with the Conservation Element's objective to maximize the use of the City's existing open space network and recreation facilities by enhancing those facilities and providing connections to the regional and community open space system. The proposed Project would serve to activate an area along the Los Angeles River corridor with a vibrant mixed-use development with residential, office, and restaurant uses. Additionally, the proposed Project would not conflict with the Conservation Element's objectives related to the protection of important cultural and historic sites, agricultural lands, equine areas, or forests, as no such resources would be impacted by the proposed Project. Therefore, the proposed Project would not conflict with the Conservation Element.

*iii. Citywide Design Guidelines*

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or site-specific development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the six objectives of the Citywide Design Guidelines, as discussed below.

- Objective 1: Consider Neighborhood Context and Linkages in Building and Site Design.

The Project Site is located on an infill lot at the terminus of Casitas Avenue. The Project Site is geographically isolated from neighboring communities to the east and north by the railroad right-of-way and the SR-2. However, the proposed Project is designed to promote connectivity to the Los Angeles River corridor by orienting the commercial restaurant land uses along the west side of the Project Site fronting the Los Angeles River and would provide a linear fire lane and walking path along the southern property line to facilitate pedestrian and bike access. As such, the proposed Project would be consistent with this objective.

- Objective 2: Employ High Quality Architecture to Define the Character of the Commercial Districts.

This objective is not applicable to the proposed Project as the Project Site is not within a commercial district. Though, the proposed Project would be designed to be visually consistent with the surrounding neighborhood as it relates to building siting, architectural design, architectural materials, and landscaping. The proposed Project's modern design is reminiscent of the surrounding area's commercial and industrial land uses. Furthermore, the building setback and landscaped buffer proposed along the southern property line serves as an appropriate transition between the Project Site and the Los Angeles River corridor.

- Objective 3: Augment the Streetscape with Pedestrian Amenities.

This objective is not applicable to the proposed Project as the Project Site is located at the terminus of Casitas Avenue. The lot to the south of the Project Site is currently vacant and there are no commercial land uses for the public to access along the streetscape frontage.

- Objective 4: Minimize the Appearance of Driveways and Parking Areas.

The proposed Project would be consistent with this objective as the Project Site would be accessible via a single driveway on Casitas Avenue. As shown in Figure II-13, Illustrative Renderings, in Section II, Project Description of this EIR, the proposed seven level parking structure would be screened from the public viewpoint along Casitas Avenue as it would be located behind Building A. Additionally, the parking area would be partially screened from the public as the northerly property is improved with a two-story self-storage structure that blocks views onto the Project Site.

- Objective 5: Include Open Space to Create Opportunities for Public Gathering.

As shown in Figure II-5, Ground Floor and Landscape Plan, and Figure II-6, Typical Upper Level Landscape Plan, in Section II, Project Description, the proposed Project incorporates approximately 58,176 square feet of on-site open space and amenity areas that will provide opportunities for residents and victors to gather and recreate on-site. As such, the proposed Project would be consistent with this objective.

- Objective 6: Improve the Streetscape by Reducing Visual Clutter.

The Project Site is visually isolated from neighboring communities to the east and north by the railroad right-of-way and the SR-2. Due to these features, and the Project Site's location at the terminus of Casitas Avenue, views from the street are generally limited and isolated to the visitors and patrons of the self-storage facility to the north. Nevertheless, the proposed Project would improve the visual character of the streetscape by replacing an existing light industrial/warehouse/film production use with an expansive surface parking lot with an attractive mixed use project. The front entrance to the Project Site would be improved with landscaping to improve the aesthetic of the streetscape as viewed from Casitas Avenue. Thus, the proposed Project would be consistent with this objective.

*iv. City of Los Angeles Walkability Checklist*

The proposed Project would incorporate, where applicable, many of the implementation strategies presented in the Walkability Checklist and would implement a number of relevant design elements in order to foster a vibrant and visually appealing pedestrian environment. As stated above, the Project Site is geographically and visually isolated from the surrounding neighborhoods to the north and east by the railroad right-of-way, the SR-2 Freeway and fact that the site is situated at the terminus of Casitas Avenue. As such, many of the streetscape policies that are oriented at activating the streetscape are not applicable as the Project Site has minimal street frontage on Casitas Avenue and is not situated in a traditional residential or commercial neighborhood. Nevertheless, the proposed Project provides pedestrian accessways through the site that would enhance the pedestrian experience and provide connectivity to the Los Angeles River corridor and the proposed State Park land to the south. The Walkability Checklist calls for the use of on-site landscaping to contribute to the environment, add beauty, increase pedestrian comfort, add visual relief to the street, and extend the sense of the public right-of-way. The proposed Project would be consistent with this policy as it would provide landscaped open space areas within a central courtyard, along the perimeter of the site and a central pedestrian walkway connecting Casitas Avenue to the commercial restaurant uses proposed on the southern portion of the Project Site. As shown in Figure II-5, Ground Level Landscape Plan, the proposed Project would complement the pedestrian movement with walkways, a bike path and a plant palette that appropriately transitions to

the Los Angeles River corridor and proposed State Park property to the south. Thus, the proposed Project would be consistent with the applicable policies of the Walkability Checklist.

*v. Height and Massing*

The proposed project is consistent with the allowable building height and building mass (i.e., floor area ratio [FAR]) for the Project Site. The Project Site is located in Height District No. 1, which limits development to an FAR of 1.5:1 but has no restriction on building height. Pursuant to Section 12.22-A,25 of the Municipal Code, Density Bonus Compliance Review, the Project is eligible for a by-right 35 percent Density Bonus by providing 11 percent of the base density under the CM zone (i.e., R3 density) as Very Low Income Units with an On Menu Density Bonus Incentive for a 35 percent increase in FAR and a Waiver of Development Standard to use lot area as buildable area. With approval of the discretionary actions, the proposed Project would be consistent with the allowable density on the Project Site.

*vi. Cypress Park and Glassell Park CDO Design Guidelines*

The proposed Project is not located on an identified commercial street; thus, the CDO Design Guidelines for commercial development are not directly applicable to the proposed Project. Nevertheless, the proposed Project's commercial component would support the intent of the CDO Design Guidelines for commercial uses. The proposed Project would provide pedestrian-oriented commercial uses within the commercial development focused on the ground floor and oriented outward towards Casitas Avenue, pedestrian paths and bike paths on the Project Site, and the paved maintenance road along the Los Angeles River. This paved maintenance road, also utilized by pedestrians, runs between the Project Site and the Los Angeles River and connects to existing residential neighborhoods west and north of SR-2. Commercial uses along the south side of the Project Site would be accessible from the public paths along the Los Angeles River, and these uses would also provide outdoor patio space fronting the Los Angeles River. Commercial signage would comply with the City of Los Angeles Sign Provisions and with the CDO Guidelines and Development Standards. The CDO Design Guidelines provide conditions on the quality of signs, illumination, and mural signs. The CDO Design Guidelines and Development Standards further prohibits off-site signage, billboards, signs advertising off-site activities, pole signs, attention-getting devices, and temporary banners, streamers, and flags that are not affixed to a flagpole. The proposed Project would comply with these standards. Table IV.F-7 in Section IV.F, Land Use and Planning, provides a discussion of the proposed Project's consistency with the Cypress Park and Glassell Park Community Design Overlay Design Guidelines for multi-family residential development.

*vii. RIO Ordinance and Los Angeles River Design Guidelines*

The proposed Project would be consistent with the draft development regulations outlined in the RIO Ordinance (No. 183,145). As indicated in Figures II-5 and II-6 in Section II, Project Description of this EIR, the proposed Project's landscaping palette would provide native trees, plants and shrubs. The proposed Project would be consistent with the general development regulations and development regulations for the Inner Core outlined in the RIO Ordinance. The proposed Project would provide fencing and conceal mechanical equipment and exterior trash enclosures. Further, the proposed Project would activate the publicly accessible maintenance road along the Los Angeles River to the south of the Project Site by providing pedestrian connections from the Project Site to the path and providing commercial uses along the path. Thus, the proposed Project would be consistent with the RIO Ordinance.

The Los Angeles River Design Guidelines provide best practices for designing development projects to increase awareness of, and access to, the Los Angeles River. The Los Angeles River Guidelines supplement the development regulations of the Los Angeles RIO District established by the LAMC, Section 13.17. The Los Angeles River Guidelines represent performance goals and objectives for projects located within the RIO District.[13] As discussed in the Regulatory Setting subsection above, the Los Angeles River Design Guidelines have not been finalized and remain in draft form. Nonetheless, a consistency analysis of the proposed Project as it relates to the applicable goals and objectives of the Guideline is discussed in Section IV.F Land Use and Planning. (See Table IV.F-6, Project Consistency Analysis with Applicable Goals of the Los Angeles River Design Guidelines).

*viii. Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes*

The Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes (Landscaping Guidelines) for the Los Angeles River and Tujunga Wash provides County-approved guidelines and procedures to implement projects that demonstrate BMPs for watershed protection, and acceptable amenities and plant materials for public use between the top of the channel and the public right-of-way (ROW) limits. The Landscaping Guidelines document is divided into two parts: Design Considerations and Planting Guidelines. The Design Considerations outline the goals and approach for revegetation of the public ROW. The Planting Guidelines are specific to the process of planning and planting on the public ROW. The Plant Palette Guidelines provide opportunities for

[13] *City of Los Angeles, Department of City Planning, Los Angeles River Design Guidelines: Best Practices for 'Riverly' Development, Draft, July 29, 2015, page 4.*

distinctive design applications depending on the native palettes chosen on a site-by-site basis.

The Landscaping Guidelines focus on the following objectives:

- Create a River Identity; Provide a Framework for Public Recreation and Non-motorized Transportation;
- Create an Indigenous Native Plant Landscape;
- Implement Watershed Management Best Management Practices (BMPs); and
- Utilize Sustainable Forms of Energy and Materials.

The Landscaping Guidelines are specifically for the public ROW adjacent to the Los Angeles River system. Nonetheless, the proposed Project would be consistent with the applicable design guidelines of the Landscape Guidelines. The proposed Project would contribute to the revitalization of the Cypress Park and Glassell Park Community Design Overlay District and RIO District by providing new "smart-growth" infill development with residential, office, restaurant, and urban farm uses. The proposed Project would replace an existing light manufacturing building with a new mixed-used development that meets current California Green Code (CALGreen) and the City of Los Angeles Green Building Code standards and incorporates sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve the equivalent of a LEED-certified building.

Additionally, the proposed Project would promote and support pedestrian activity along the Los Angeles River by orienting commercial and residential uses (along the southern property line) toward the Los Angeles River, by creating a community environment interior to the Project Site, and by creating new contiguous pedestrian and bicyclist access on the Project Site between the Los Angeles River and Casitas Avenue. Landscaped areas would be planted with a combination of native trees, plants and shrubs, or species defined as Watershed Wise, or species listed in the LARMP Guidelines and Plant Palettes. The Project Site would be designed to manage and capture stormwater runoff to the maximum extent feasible utilizing various LID Ordinance techniques, including but not limited to infiltration, evapotranspiration, capture for use, high-efficiency bio-filtration, retention systems and BMPs. The proposed Project would also comply with water quality standards and wastewater discharge requirements set forth by the SUSMP for Los Angeles County and Cities in Los Angeles County and approved by the LARWQCB.

***In conclusion, the proposed Project would not conflict with the applicable zone regulations governing height and massing, or applicable policies or objectives governing aesthetic or scenic qualities and aesthetic impacts would be less than significant.***

### (2) Mitigation Measures

Impacts related to visual character or quality would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Impacts related to visual character or quality would be less than significant without mitigation.

***Threshold (d): Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

### (1) Impact Analysis

#### *(a) Construction Nighttime Lighting*

Project construction lighting would increase the low-level of existing nighttime lighting at the Project Site. The proposed Project's construction activities would be limited to daytime hours and would not require any nighttime illumination for construction activities. However, it is anticipated that low-level security lighting fixtures would be installed on-site and at the site entrance for security purposes. As noted above, temporary perimeter fencing would be installed during the construction period to effectively block the line of sight from off-site properties (see Project Design Feature AES-PDF-1, above). As such, the perimeter fencing would also be effective in blocking light trespass onto adjacent properties during the construction period. ***Thus, Project construction lighting would not adversely affect day or nighttime views in the area.***

#### *(b) Operational Nighttime Lighting*

Ambient nighttime lighting on the Project Site and in the Project Site vicinity is generated by sources that include streetlights, automobile headlights, on-site security lighting, and indoor and outdoor building lighting. The proposed Project would introduce lighting to the Project Site area due primarily to building illumination emanating through the windows of the proposed ground floor commercial storefronts, residences, security and pedestrian safety lighting fixtures, and light from vehicles entering and exiting the parking garage.

Lighting associated with the proposed commercial and residential uses and the parking garage is not anticipated to substantially impact any surrounding sensitive uses, such as the Los Angeles River and the River House. The proposed Project would be required to comply with the RIO Ordinance, which sets exterior site lighting requirements for development projects within the RIO District. Exterior lighting on-site would be designed to produce a maximum initial luminance value no greater than 0.20 horizontal and vertical foot-candles at the site boundary and no greater than 0.01 horizontal foot candle 15 feet beyond the Project Site. The commercial uses and residential uses that would front the Los Angeles River would, therefore, be required to comply with the RIO Ordinance and, as such, would not adversely impact the Los Angeles River or the River House.

Additionally, the Project Site includes one full access driveway on the northeast corner of the Project Site. The driveway provides access to the proposed parking structure and connects to Casitas Avenue. Vehicles leaving the Project Site would shine headlights towards the railway, which is not a sensitive receptor. Vehicles entering the Project Site would shine headlights towards the parking garage. As such, the proposed Project would not result in vehicles headlights casting light on the Los Angeles River and the River House. In addition, Building G Levels 1 through 6 would not be visible from the south elevation.

As provided above in Project Design Feature AES-PDF-2, exterior lighting on-site would generally include low-level security lighting, residential lighting, architectural building lighting, landscape elements, and Project signage. Commercial signage would comply with the City of Los Angeles Sign Provisions and with the CDO standards. The CDO Design Guidelines provide conditions on the quality of signs, illumination, and mural signs. The commercial office and urban farm uses on-site would generally operate during the day and would create minimal nighttime lighting. The commercial restaurant and beer garden uses located on the southern portion of the Project Site overlooking the Los Angeles River would operate into the evening hours, until 11:00 P.M., or as otherwise specified by the conditional use permit. Nevertheless, all exterior lighting on-site would comply with the exterior lighting standards applicable to development within the RIO District. Interior light emanating from the proposed residential uses and commercial uses would be a relatively low-level indirect source of light and would not adversely impact other properties in the immediate area or the Los Angeles River. To ensure that lighting sources are not directly visible by adjacent properties, the proposed Project's lighting fixtures would be installed and operated in accordance with 99.05.106.8 (Light Pollution Reduction) of the City of Los Angeles Green Building Code (which requires outdoor lighting systems to be designed and installed to comply with the minimum requirements in the California Energy Code, or comply with a local ordinance, whichever is more stringent). Overall, the proposed Project would be expected to slightly increase ambient

lighting in the area since the beer garden is anticipated to operate until the evening hours. ***The proposed Project would not surpass the lighting criteria specified in the LAMC for a significant impact to occur. Impacts related to nighttime lighting would, therefore, be less than significant.***

*(c) Glare*

The Project Site currently produces minimal glare, primarily associated with vehicles parked on the on-site surface parking lot. The proposed Project would introduce five buildings to the Project Site. The structures will be constructed with materials designed to reduce glare, as identified in Project Design Feature AES-PDF-3. The architectural materials of the proposed Project would include a variety of surface materials, including medium grain finish plaster (stucco), concrete fiber board panel siding, standing seam metal siding, aluminum storefront glazing, aluminum frame casement windows, aluminum frame sliding doors, aluminum storefront glazing, roll up sectional garage door, glass, painted steel guardrail, louvers, and design features, and cast-in-place concrete. Interior lighting from within the residential, commercial and greenhouse spaces would be visible from surrounding structures during evening hours but would not cast spillover light or glare onto adjacent properties. As part of Project Design Feature AES-PDF-3, the proposed Project's façades and windows will be constructed of non-reflective materials (e.g., minimize the use of glass with mirror coatings) such that glare impacts on surrounding properties and roadways are minimized. Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted. There would not negligible potential for daytime or nighttime glare, and light and glare associated with the Project would not substantially alter the character of the Project area. Furthermore, the landscaped courtyards and green areas would serve to reduce the buildings' heat gain and reflective glare potential. The Project would result in a less-than-significant impact with respect to generating a source of glare within the Project Site area.

***Based on the above, with compliance with all applicable City regulations and the implementation of Project Design Features, light and glare associated with Project construction and operation would not adversely impact the ambient nighttime levels in the immediate area or the Los Angeles River, and the Project would not create a new source of substantial light or glare that would adversely affect the Project area.***

### (2) Mitigation Measures

Impacts related to light and glare would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Impacts related to light and glare would be less than significant without mitigation.

## 4. Cumulative Impacts

### (1) Impact Analysis

#### *(a) Construction Impacts*

Related projects that are located within a similar view field or along the same roadway as the Project, or within proximity to the Project, have the potential to contribute to cumulative aesthetic impacts including view blockage, visual character, light and glare. Based on a review of the Related Projects identified in Section III, Environmental Setting, Related Project 15 (the State Park property to the south) is the only related project within the viewshed of the Project that would have the potential to result in cumulative aesthetic impacts during construction if construction occurred at the same time as the proposed Project. No construction timeline or specific development plans have been provided by the State Parks for the development of this property. As such, any analysis of cumulative aesthetic construction impacts would be speculative. However, views of the State Park property are limited by the roadway configuration of Casitas Avenue (i.e., Casitas Avenue terminates at the State Park property), the elevated railroad right-of-way- easement to the east, and the Los Angeles River Corridor to the south and west. As noted above, the proposed Project's aesthetic impacts during construction would be less than significant with the installation of perimeter fencing and low-level security lighting. It is anticipated that if construction were to occur on the State Property at the same time as the Proposed Project, aesthetic impacts during construction would be less than significant as neither site would result in a significant obstruction of views within the project area. ***The proposed Project's cumulative aesthetic impacts during construction would, therefore, be considered less than significant.***

#### *(b) Operational Impacts*

Development of the proposed Project, in conjunction with the related projects, would result in an intensification of existing prevailing land uses in the Project Site area. Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to aesthetic impacts, Related Project Nos. 12 (370

multi family dwelling units proposed at 2910 San Fernando Road) and 6 (650-student Charter School proposed at 2588 N. San Fernando Road) are the only related projects within the immediate viewshed that have the potential to alter the aesthetic character of the surrounding neighborhood. However, both of these projects are located east of the railway, which is on an elevated earthen berm that is approximately 12 to 15 feet above grade. As such, the field of view from the pedestrian level is blocked, and the two sites are not within the same viewshed when viewed from the ground level. Other related projects identified in Table III-2 in Section III, Environmental Setting, are located outside the immediate field of view and, thus, would have no potential to result in cumulative aesthetic impacts. Accordingly, due to the relative isolation of the Project Site at the terminus of Casitas Avenue, wedged between the railway to the east, the Los Angeles River to the west, and SR-2 to the west and north, the Project Site is visually isolated from the surrounding areas. Thus, changes to the visual aesthetic environment at the Project Site, such as landscaping, nighttime lighting, and architectural scale and massing would not affect the field of view or local aesthetic character at any of the related project sites. ***The proposed Project's cumulative aesthetic impacts would, therefore, be considered less than significant.***

*(c) Cumulative Visual Character and Quality of the Site*

Development of the related projects is expected to occur in accordance with adopted plans and regulations. Similar to the proposed Project, related projects would be expected to conform to the applicable design guidelines (such as the CDO Design Guidelines), ordinances that guide development (such as the RIO Ordinance), and the associated community plan that applies to each related project site.

With respect to the overall visual quality of the surrounding neighborhood, each of the related projects would be subject to Site Plan Review and other applicable reviews by the City of Los Angeles Department of City Planning for review and approval. It is anticipated that similar to the proposed Project, each related project would be subject to the applicable provisions of the LAMC with respect to building height, setbacks, and allowable floor area, which would ensure that the buildout of the community is consistent with the underlying zoning codes and General Plan land use policies that are in place to preserve the neighborhood's aesthetics and character. The Site Plan Review and other applicable reviews would ensure that each related project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. Moreover, a review of the related projects list indicates that the closest related project to the Project Site is located 700 feet away. As such, there are no immediately adjacent related projects to the Project Site, and related projects would not combine to create a cumulative aesthetic impact, either in terms of blockage of views or architectural compatibility. ***As such, the proposed Project would not result in a***

***cumulatively considerable impact on the visual character or visual quality of the Project area, and cumulative impacts would be considered less than significant.***

*(d) Cumulative Light and Glare Impacts*

With respect to light and glare impacts, the proposed Project, in combination with the related projects, would increase nighttime lighting and daytime glare in the area. Nighttime lighting impacts during construction would be limited to low-level security lighting for site security and safety purposes. As such, cumulative lighting impacts during construction activities would be less than significant. With respect to operational impacts, similar to the proposed Project, however, each related project would be expected to comply with Code-required lighting measures (including lighting measures for development within the RIO District, if applicable) that would reduce light and glare impacts. ***As such, the proposed Project would not make a cumulatively considerable contribution to light or glare, and cumulative impacts would be considered less than significant.***

### (2) Mitigation Measures

Cumulative impacts related to aesthetics including visual character, light and glare would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Cumulative impacts related to aesthetics including visual character, light and glare, would be less than significant without mitigation.

# IV. Environmental Impact Analysis

# B. Air Quality

## 1. Introduction

This section examines the degree to which the proposed Project may result in significant environmental impacts with respect to air quality. Both short-term construction emissions occurring from activities, such as demolition, site grading, and haul truck trips, and long-term effects related to the ongoing operation of the proposed Project are discussed in this section. The analysis contained herein focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. As used in this study, the term "emissions" refers to the actual quantity of pollutant measured in pounds per day (ppd). The term "concentrations" refers to the amount of pollutant material per volumetric unit of air as measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter ($\mu g/m^3$).

The potential for the proposed Project to conflict with or obstruct implementation of the applicable air quality plan, to violate an adopted air quality standard or contribute substantially to an existing or projected air quality violation, to result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is designated to be in non-attainment, to expose sensitive receptors to substantial pollutant concentrations, or to create objectionable odors affecting a substantial number of people is discussed below. Documents and references used in the preparation of this section include, but are not limited to, the air quality modeling worksheets presented in Appendix C (Air Quality Modeling Worksheets) to this Draft EIR, the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook (1993), the 2016 Air Quality Management Plan (AQMP), as amended, the L.A. CEQA Thresholds Guide (2006), as well as federal and state regulations and guidelines.

The Project Site is located within the South Coast Air Basin (Basin). This Basin includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. The regional climate within the Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Basin is primarily influenced by a wide range of emissions sources – such as dense population centers, heavy vehicular traffic, and industry – and meteorology.

## a) Air Pollutants

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples of point sources include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products such as lighter fluid and hair spray. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, racecars, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Both the federal and state governments have established ambient air quality standards for outdoor concentrations of various pollutants in order to protect public health and welfare. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, that have been adopted for them. The national and state standards have been set at levels considered safe to protect public health, including the health of "sensitive" populations, such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

The criteria air pollutants that are most relevant to current air quality planning and regulation in the Basin include ozone ($O_3$), carbon monoxide (CO), nitrogen dioxide ($NO_2$), respirable particulate matter ($PM_{10}$), fine particulate matter ($PM_{2.5}$), sulfur dioxide ($SO_2$), and lead (Pb). In addition, toxic air contaminants (TACs) are of concern in the Basin. The characteristics of each of these pollutants are briefly described below.

- *$O_3$* is a highly reactive and unstable gas that is formed when reactive organic gases (ROGs) and nitrogen oxides ($NO_x$), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. $O_3$ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.

- *CO* is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the

highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike $O_3$, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

- *$PM_{10}$* and *$PM_{2.5}$* consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.

- *$NO_2$* is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of nitrogen oxide ($NO_x$) compounds, $NO_2$ is the most abundant in the atmosphere. As ambient concentrations of $NO_2$ are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of $NO_2$ than those indicated by regional monitors.

- *$SO_2$* is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When $SO_2$ oxidizes in the atmosphere, it forms sulfates ($SO_4$). Collectively, these pollutants are referred to as sulfur oxides ($SO_x$).

- *Pb* occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne Pb in the Basin. The use of leaded gasoline is no longer permitted for on road motor vehicles, so the majority of such combustion emissions are associated with off-road vehicles, such as racecars. However, because leaded gasoline was emitted in large amounts from vehicles when leaded gasoline was used for on-road motor vehicles, Pb is present in many urban soils and can be re-suspended in the air. Other sources of Pb include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and the use of secondary lead smelters.

- *TACs* are air pollutants which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health (Health and Safety Code (HSC) Section 39655a). TACs refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human

health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. TACs are different than "criteria" pollutants in that ambient air quality standards have not been established for them, largely because there are hundreds of air toxics and their effects on health tend to be felt on a local scale rather than on a regional basis.

## b) Health Effects of Criteria Pollutants

The health effects of the criteria pollutants (i.e., $O_3$, CO, $PM_{10}$ and $PM_{2.5}$, $NO_2$, $SO_2$, and Pb) and TACs are described below.[1] In addition, a list of the harmful effects of each criteria pollutant is provided in Table IV.B-1, Summary of Health Effects of Criteria Pollutants.

### (1) Ozone (O3)

Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for $O_3$ effects.

Short-term exposures (lasting for a few hours) to $O_3$ at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated $O_3$ levels are also associated with increased school absences. In recent years, a correlation between elevated ambient $O_3$ levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in high $O_3$ communities.

$O_3$ exposure under exercising conditions is known to increase the severity of the above mentioned observed responses. Animal studies suggest that exposures to a combination of pollutants that include $O_3$ may be more toxic than exposure to $O_3$ alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

[1] *The descriptions of the health effects of the criteria pollutants are taken from Appendix C (Health Effects of Ambient Air Pollutants) of SCAQMD's "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning" document, website: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/appendix-c.pdf?sfvrsn=2, accessed August 2016.*

**Table IV.B-1**
**Summary of Health Effects of Criteria Pollutants**

| Pollutants | Primary Health and Welfare Effects |
|---|---|
| **Ozone ($O_3$)** | • Aggravation of respiratory and cardiovascular diseases<br>• Reduced lung function<br>• Increased cough and chest discomfort |
| **Carbon Monoxide (CO)** | • Aggravation of some heart disease (angina)<br>• Reduced tolerance for exercise<br>• Impairment of mental function<br>• Impairment of fetal development<br>• Death at high levels of exposure |
| **Particulate Matter ($PM_{10}$ and $PM_{2.5}$)** | • Reduced lung function<br>• Aggravation of respiratory and cardio-respiratory diseases<br>• Increases in mortality rate<br>• Reduced lung function growth in children |
| **Nitrogen Dioxide ($NO_2$)** | • Aggravation of respiratory illness |
| **Sulfur Dioxide ($SO_2$)** | • Aggravation of respiratory diseases (asthma, emphysema)<br>• Reduced lung function |
| **Lead (Pb)** | • Behavioral and hearing disabilities in children<br>• Nervous system impairment |

*Source: SCAQMD, Guidance Document for Air Quality Issues in General Plans and Local Planning, 2005.*

### (2) Carbon Monoxide (CO)

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart.

Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.

Reduction in birth weight and impaired neurobehavioral development has been observed in animals chronically exposed to CO resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels. These include pre-term births and heart abnormalities.

### (3) Particulate Matter ($PM_{10}$ and $PM_{2.5}$)

A consistent correlation between elevated ambient particulate matter ($PM_{10}$ and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and lung cancer.

Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show that lung function growth in children is reduced with long-term exposure to particulate matter.

The elderly, people with pre-existing respiratory or cardiovascular disease and children appear to be more susceptible to the effects of $PM_{10}$ and $PM_{2.5}$.

### (4) Nitrogen Dioxide ($NO_2$)

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to $NO_2$ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to $NO_2$ in healthy individuals. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

In animals, exposure to levels of $NO_2$ considerably higher than ambient concentrations results in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of $O_3$ exposure increases when animals are exposed to a combination of $O_3$ and $NO_2$.

### (5) Sulfur Dioxide ($SO_2$)

A few minutes of exposure to low levels of $SO_2$ can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing

difficulties, are observed after acute exposure to $SO_2$. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of $SO_2$.

Animal studies suggest that despite $SO_2$ being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient $SO_2$ levels. In these studies, efforts to separate the effects of $SO_2$ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or whether one pollutant alone is the predominant factor.

#### (6) Sulfates (SOx)

Most of the health effects associated with fine particles and $SO_2$ at ambient levels are also associated with $SO_4$. Thus, both mortality and morbidity effects have been observed with an increase in ambient $SO_4$ concentrations. However, efforts to separate the effects of $SO_4$ from the effects of other pollutants generally have not been successful.

Clinical studies of asthmatics exposed to sulfuric acid suggest that adolescent asthmatics are possibly a subgroup susceptible to acid aerosol exposure. Animal studies suggest that acidic particles such as sulfuric acid aerosol and ammonium bisulfate are more toxic than non-acidic particles like ammonium sulfate.

#### (7) Lead (Pb)

Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence levels. In adults, increased Pb levels are associated with increased blood pressure.

Pb poisoning can cause anemia, lethargy, seizures, and death. It appears that there are no direct effects of Pb on the respiratory system. Pb can be stored in the bone from early-age environmental exposure, and elevated blood Pb levels can occur due to the breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of Pb because of previous environmental Pb exposure of their mothers.

### (8) Toxic Air Contaminants (TACs)

TACs are a broad class of compounds known to cause or contribute to cancer or non-cancer health effects, such as birth defects, genetic damage, and other adverse health effects. As discussed previously, effects from TACs may be both chronic and acute on human health. Acute health effects are attributable to sudden exposure to high quantities of air toxics. These effects include nausea, skin irritation, respiratory illness, and, in some cases, death. Chronic health effects can result from low-dose, long-term exposure from routine releases of air toxics. The effect of major concern for this type of exposure is cancer, which typically requires a period of 10 to 30 years after exposure to develop.

TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Diesel particulate matter is a predominant TAC and accounts for approximately 70 percent of total known cancer risk related to air toxins in California. Based on 2012 estimates of statewide exposure, diesel particulate matter is estimated to increase statewide cancer risk by 520 cancers per million residents exposed over a lifetime.[2] According to the California Air Resources Board (CARB), diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified by the CARB as TACs and are listed as carcinogens either under California's Proposition 65 or under the federal Hazardous Air Pollutants programs. The United States Environmental Protection Agency (USEPA) has adopted Ultra Low Sulfur Diesel (ULSD) fuel standards to reduce diesel particulate matter. As of June 1, 2006, refiners and importers nationwide have been required by the USEPA to ensure that at least 80 percent of the volume of the highway diesel fuel they produce or import would be ULSD-compliant. As of December 10, 2010, only ULSD fuel is available for highway use nationwide. In California, which was an early adopter of ULSD fuel and engine technologies, 100 percent of the diesel fuel sold – downstream from refineries, up to and including fuel terminals that store diesel fuel – has been ULSD fuel since July 15, 2006. Since September 1, 2006, all diesel fuel offered for sale at retail outlets in California has been ULSD fuel.

[2] *California Environmental Protection Agency, Air Resources Board, Overview: Diesel Exhaust and Health, website: https://www.arb.ca.gov/research/diesel/diesel-health.htm, accessed: June 2017.*

# 2. Environmental Setting

## a) Regulatory Framework

Air quality in the United States is governed by the federal Clean Air Act (CAA). In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA).

Air quality within the Basin is addressed through the efforts of various federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality within the Basin are discussed below.

### (1) Federal

The United States Environmental Protection Agency (USEPA) is responsible for setting and enforcing the federal ambient air quality standards for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The USEPA also has jurisdiction over emissions sources outside state waters (outer continental shelf) and establishes various emissions standards for vehicles sold in states other than California.

The USEPA administers the CAA. The CAA was first established in 1963 to control air pollution and expand research in monitoring, and control techniques. Major amendments were added in 1970, 1977, and 1990. The 1970 amendment allowed for federal and state regulations to limit emissions stationary and mobile sources and established major regulatory programs, including the National Ambient Air Quality Standards (NAAQS), State Implementation Plans, New Source Performance Standards, and National Emissions Standards for Hazardous Air Pollutants (NESHAP). The 1977 amendment expanded these provisions, which included requirements for areas in attainment and non-attainment to NAAQS and established a permit review process to ensure attainment and maintenance of NAAQS. The 1990 amendments further expanded the authority and responsibility of the CAA, which included new programs and expanded existing programs governing acid rain, toxic air pollutants, other NAAQS standards, and $O_3$ protection.[3] Title I (provisions on non-attainment areas) and Title II (provisions on mobile sources) of the CAA would be most applicable to the proposed Project. Refer to Table IV.B-3, below, which indicates pollutants and areas of attainment and non-attainment.

[3] *United States Environmental Protection Agency, Evolution of the Clean Air Act, website: https://www.epa.gov/clean-air-act-overview/evolution-clean-air-act, accessed: June 2017.*

As part of its enforcement responsibilities, the USEPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP). The SIP is a plan for each state which identifies how that state will attain and/or maintain the primary and secondary NAAQS set forth in Section 109 of the CAA. These plans are developed through a public process, formally adopted by the state, and submitted by the Governor's designee to the USEPA. The CAA requires the USEPA to review each plan and any plan revisions and to approve the plan or plan revisions if consistent with the CAA.

### (2) State

The CCAA was signed into law in 1988 and requires the California Air Resources Board (CARB) to adopt and maintain air quality standards (i.e., California Ambient Air Quality Standards (CAAQS)). All areas of the state are required to meet the CAAQS. Refer to Table IV.B-3 below, which indicates pollutants and areas of attainment and non-attainment.

The CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, the CARB conducts research, sets CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. The CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hair spray, aerosol paints, and lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. In some cases, the state standards are more restrictive than the federal standards established under the CAA.

#### *(a) Toxic Air Contaminant Identification and Control Program (AB 1807)*

In 1983, the California Legislature adopted the Toxic Air Contaminant Identification and Control Program (AB 1807), which established a two-step process of risk identification and risk management to address the potential health effects from air toxic substances and protect the public health of Californians. In the first step (risk identification), the CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified as a TAC in California. CARB has identified over 200 compounds as toxic air contaminants through a combination of the state process and USEPA Hazardous Air Pollutants into the California list.[4] In the second step (risk management), the CARB reviews the emission sources of an identified TAC to determine if any regulatory action is necessary to reduce the risk. The analysis includes a review of

[4] *ARB/CAPCOA Risk Management Guidance for Stationary Sources of Air Toxics, July 23, 2015.*

controls already in place, the available technologies and associated costs for reducing emissions, and the associated risk. As part of this process, CARB develops proposals to manage those potential risks with statewide emission control regulations called Airborne Toxic Control Measures (ATCMs). ATCMs decrease public exposure through process changes, best available control devices, and/or product reformulation in consideration of cost and health risk.

*(b) Off-Road Diesel Emissions*

Off-road diesel vehicles, which include construction equipment, are also regulated by the CARB for both in-use (existing) and new engines. Four sets of standards implemented by the CARB for new off-road diesel engines, known as Tiers. Tier 1 standards began in 1996. Tiers 2 and 3 were adopted in 2000 and were more stringent than the Tier 1 standards. Tier 2 and Tier 3 standards were completely phased in by 2006 and 2008, respectively. Tier 4 standards were adopted in 2004 and were phased in over the period from 2008-2015. Tier 4 emission standards will reduce particulate matter and $NO_X$ emissions of off-road equipment to 90 percent below current levels.

Since off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. On July 26, 2007, the CARB approved the "In-Use Off-Road Diesel Fueled Fleets Regulation" to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation became effective on June 15, 2008, and sets an anti-idling limit of five minutes for all off-road vehicles 25 horsepower and up. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October 2016, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines, and started enforcing beginning July 1, 2014. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year, or has completed the Best Available Control Technology (BACT) requirements. Large fleets have compliance deadlines each year from 2014 through 2023, medium fleets each year from 2017 through 2023, and small fleets each year from 2019 through 2028.

Reducing diesel particulate emissions is one of CARB's highest priorities and has set a long-term goal to reduce diesel particulate emissions by 85 percent by 2020. To further address TACs, CARB published the Air Quality and Land Use Handbook in April 2005, which discusses land use and planning strategies to protect sensitive receptors (such as children, pregnant women, the elderly, and those with existing health problems) from TAC

emissions. This handbook serves as a general guide for local municipalities and agencies and is voluntary.[5]

### (3) Regional

#### *(a) Southern California Association of Governments (SCAG)*

The Southern California Association of Governments (SCAG) is a council of governments for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG is a regional planning agency and forum for regional issues relating to transportation, the economy and community development, and the environment. Although SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality.

On April 7, 2016, the Regional Council of SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and High Quality of Life (2016-2040 RTP/SCS). The 2016-2040 RTP/SCS is an update to the 2012-2035 RTP/SCS that further integrates land use and transportation in certain areas so that the region as a whole can grow smartly and sustainably. Between 2015 and 2040, the region is anticipated to experience increases in population, households, and jobs. The 2016-2040 RTP/SCS includes land use strategies, based on local general plans, as well as input from local governments, to achieve the Assembly Bill (AB) 32 state-mandated reductions in GHG emissions through decreases in regional per capita vehicle miles traveled (VMT). As part of the 2016-2040 RTP/SCS, transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand.

Within the RTP, the SCS demonstrates the region's ability to attain and exceed the GHG emission reduction targets set forth by the CARB. The SCS outlines the region's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the

[5] *CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.*

proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. SCAG's SCS provides specific strategies for successful implementation. These strategies include supporting projects that encourage diverse job opportunities for a variety of skills and education, recreation and culture and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads, and highways, including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors, and supporting alternative fueled vehicles.

*(b) South Coast Air Quality Management District (SCAQMD)*

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with SCAG, county transportation commissions and local governments, and cooperates actively with state and federal government agencies. The SCAQMD develops air quality related rules and regulations, establishes permitting requirements, inspects emissions sources, and provides regulatory enforcement through such measures as educational programs or fines, when necessary.

*(i) Air Quality Management Plan (AQMP)*

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and state ambient air quality standards (CAA and CCAA discussed above). SCAQMD has responded to this requirement by preparing a series of AQMPs. The 2016 AQMP was adopted by the Governing Board of the SCAQMD on March 3, 2017. The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy.

The 2016 AQMP is composed of stationary and mobile source emission reduction strategies from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, furthering deployment of cleaner technologies, mobile source strategies and reductions from federal sources. These strategies are implemented

in partnership with the CARB and the USEPA. In addition, SCAG recently approved their 2016 RTP/SCS that include transportation programs, measures, and strategies generally designed to reduce VMT, which are contained within baseline emissions inventory in the 2016 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and SIP for the Basin, are based on SCAG's 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). Some of the control measures achieve emission reductions by continuing existing regulatory requirements and programs and extensions of those programs, while some control measures are not regulatory in form, but instead focus on incentives, outreach, and education to bring about emission reductions through voluntary participation and behavioral changes needed to complement regulations. In order to meet current standards, the 2016 AQMP builds upon past successes with new regulatory commitments for additional emissions reductions to the same extent as past AQMPs.

The future air quality levels projected in the 2016 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by SCAG's 2016 RTP/SCS. The 2016 AQMP also assumes that general development projects will include feasible strategies (i.e., mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations, which are designed to address air quality impacts and pollution control measures. The 2016 AQMP incorporates new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling. General development projects would be affected in the form of any applicable rules and regulations – if any – that are adopted as a result of the 2016 AQMP. While economic growth for the region is desirable, it presents a challenge to air quality improvement efforts since the projected growth could offset the impressive progress made in reducing volatile organic compounds (VOC), NOx, and $PM_{2.5}$ emissions through adopted regulations. Meeting the USEPA's current and more stringent future air quality standards will require the continuation of emission reduction efforts from all levels of government.

In addition to the AQMP, the SCAQMD has prepared the *CEQA Air Quality Handbook* (1993) to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects and plans proposed in the Basin. The AQMD is in the process of developing an *"Air Quality Analysis Guidance Handbook"* to replace the CEQA Air Quality Handbook approved by the AQMD Governing Board in 1993.

*(ii) Rules and Regulations*

SCAQMD Rule 403 (Fugitive Dust)

The purpose of SCAQMD Rule 403 (Fugitive Dust) is to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (man-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. The provisions of Rule 403 shall apply to any activity of man-made condition capable of generation fugitive dust. Rule 403 applies to the construction activities of the proposed Project, especially the grading/excavation phase.

SCAQMD Rule 1113 (Architectural Coatings)

Architectural coatings are any coatings applied to stationary structures or their appurtenances, or to fields and lawns. SCAQMD Rule 1113 (Architectural Coatings) is applicable to any person who supplies, sells, markets, offers for sale, or manufactures any architectural coating that is intended to be field applied within the District to stationary structures or their appurtenances, and to fields and lawns; as well as any person who applies, stores at a worksite, or solicits the application of any architectural coating within the District. The purpose of Rule 1113 is to limit the VOC content of architectural coatings used in the District. During the architectural coatings phase, the proposed Project shall not add to such coating any colorant that contains VOC in excess of the corresponding applicable VOC limit specified in Rule 1113.

SCAQMD Rule 1108 (Cutback Asphalt)

Cutback asphalt is a liquid petroleum product produced by fluxing an asphaltic base with suitable distillate and is classed as medium or slow curing grade. The provisions of SCAQMD Rule 1108 (Cutback Asphalt) state that a person shall not sell or offer for sale for use in the SCAQMD, or use any cutback asphalt containing more than 0.5 percent by volume organic compounds which evaporate at 260 degrees Celsius (500 degrees Fahrenheit) or lower as determined by ASTM Method D402 or other test method as approved by the Executive Officer. This rule applies to the paving phase of the proposed Project.

SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations)

SCAQMD Rule 1138 applies to owners and operators of commercial cooking operations, preparing food for human consumption. Rule 1138 requirements currently apply to chain-driven charbroilers used to cook meat. All other commercial restaurant cooking equipment including, but not limited to, under-fired charbroilers, may be subject to future rule provision. Rule 1138 applies to the proposed Project's restaurant uses.

## (4) Local

### *(a) City of Los Angeles General Plan*

Local jurisdictions, such as the City of Los Angeles (City), have the authority and responsibility to reduce air pollution through their police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City is also responsible for implementation of the transportation control measures in the AQMP, such as bus turnouts, energy-efficient streetlights, and synchronized traffic signals. The City approved a comprehensive update to the long-term growth strategy in its General Plan. The Framework Element sets policy direction for the City's 35 Community Plan areas, in which detailed land use plans are described, and 12 citywide Elements (e.g., Mobility Plan 2035 and Housing). The Framework Element supports land use and transportation policies and patterns that will assist the region in meeting air quality goals, for example, by encouraging the location of residential and commercial uses near transit centers and continuing the City's "centers" development concept.

The Air Quality Element of the City's General Plan was adopted on November 24, 1992 and sets forth the goals, objectives and policies that guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges that numerous efforts are underway at the regional, county, and City levels addressing clean air concerns and that coordination of these various efforts and the involvement of the area's residents are crucial to the achievement of state and federal air quality standards. The Air Quality Element also acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and clean air goals. Mutually reinforcing strategies need to be developed to reduce the use of single occupant vehicles, vehicle trips, and vehicle miles traveled.

The Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;

- Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City utilizes the *CEQA Air Quality Handbook* as its guidance document for the environmental review of plans and development proposals within its jurisdiction.

*(b) Zoning Information (ZI) No. 2427*

ZI No. 2427 requires that all new projects and expansions of existing developments involving sensitive uses within 1,000 feet of a freeway be notified of public health implications of freeway-adjacent projects. Sensitive receptors typically include residences, schools, playgrounds and childcare centers, long-term health care facilities, rehabilitation centers, adult day care/convalescent centers, hospitals, and retirement homes.

## b) Existing Conditions

### (1) Existing Regional Air Quality

Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The Basin has low mixing heights and light winds, which help to accumulate air pollutants. The most current average daily emissions inventory for the entire Basin and the Los Angeles County portion of the Basin is summarized in Table IV.B-2, 2012 Estimated Average Daily Regional Emissions. As shown, exhaust emissions from mobile sources generate the majority of ROG, CO, $NO_x$, and $SO_x$ in the Basin and the Los Angeles County portion of the Basin. Area-wide sources generate the most airborne particulates (i.e., $PM_{10}$ and $PM_{2.5}$) in both the Basin and Los Angeles County.

Measurements of ambient concentrations of the criteria pollutants are used by the USEPA and CARB to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and state standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in "attainment." If the pollutant exceeds the standard, the area is classified as a "non-attainment" area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated "unclassified."

**Table IV.B-2**
**2012 Estimated Annual Average Emissions**

| Emissions Source | Emissions in Tons per Day | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
| **South Coast Air Basin** | | | | | | |
| Stationary (Point) Sources | 104.3 | 48.5 | 55.2 | 10.1 | 20.8 | 13.6 |
| Area-wide Sources | 122.4 | 21.8 | 102.2 | 1.0 | 96.1 | 32.4 |
| Mobile Sources | 239.8 | 441.8 | 2,114.4 | 6.6 | 36.7 | 22.4 |
| Natural (non-anthropogenic) Sources | 164.5 | 4.4 | 301.1 | 2.3 | 30.1 | 25.5 |
| Total Emissions | 630.9 | 516.5 | 2,572.9 | 20.0 | 183.7 | 94.0 |
| **Los Angeles County - South Coast Air Basin** | | | | | | |
| Stationary (Point) Sources | 68.27 | 40.88 | 42.21 | 9.26 | 22.74 | 12.05 |
| Area-wide Sources | 75.30 | 13.34 | 47.46 | 0.47 | 55.64 | 18.34 |
| Mobile Sources | 143.73 | 300.79 | 1,316.89 | 6.5 | 22.87 | 14.26 |
| Total Emissions | 287.29 | 355.0 | 1,406.57 | 16.22 | 101.25 | 44.66 |

*Sources: California Air Resources Board, Almanac Emission Projection Data (published in 2013), website: https://www.arb.ca.gov/app/emsinv/2013/emseic1_query.php?F_DIV=0&F_YR=2012&F_SEASON=A&SP=2013&F_AREA=AB&F_AB=SC&F_DD=Y, accessed September 2016.*

The USEPA and the CARB use different standards for determining whether the Basin is in attainment. Federal and state standards are summarized in Table IV.B-3, Ambient Air Quality Standards. The attainment status for the Los Angeles County portion of the Basin with regard to the NAAQS and CAAQS are also shown in Table IV.B-3. The CCAA designates air basins as either in attainment or non-attainment for each state air quality standard. The Basin is designated as a state and federal non-attainment area for $O_3$ and $PM_{2.5}$. In addition, the Basin is designated as a state non-attainment area for $PM_{10}$, and designated non-attainment for lead in the Los Angeles County portion of the Basin.

**Table IV.B-3**
**Ambient Air Quality Standards**

| Air Pollutant | Averaging Time | CAAQS | | NAAQS | |
|---|---|---|---|---|---|
| | | State Standard | Attainment Status | Federal Standard | Attainment Status |
| $O_3$ | 1 Hour | 0.09 ppm | Non-attainment | -- | Non-attainment |
| | 8 Hour | 0.07 ppm | | 0.070 ppm [a] | |
| CO | 1 Hour | 20.0 ppm | Attainment | 35.0 ppm | Attainment |
| | 8 Hour | 9.0 ppm | | 9.0 ppm | |
| $NO_2$ | 1 Hour | 0.18 ppm | Attainment | 0.10 ppm | Attainment |
| | Annual | 0.030 ppm | | 0.053 ppm | |
| $SO_2$ [b] | 1 Hour | 0.25 ppm | Attainment | 0.075 ppm | Attainment |
| | 24 Hour | 0.04 ppm | | 0.14 ppm (for certain areas) | |
| Pb | 30 Day | 1.5 µg/m$^3$ | Attainment | -- | Non-attainment |
| | Calendar Quarter Year | -- | | 1.5 µg/m$^3$ | |
| | Rolling 3-Month Average | -- | | 0.15 µg/m$^3$ | |
| $PM_{10}$ | 24 Hour | 50 µg/m$^3$ | Non-attainment | 150 µg/m$^3$ | Attainment |
| | Annual | 20 µg/m$^3$ | | -- | |
| $PM_{2.5}$ | 24 Hour | -- | Non-attainment | 35 µg/m$^3$ | Non-attainment |
| | Annual | 12 µg/m$^3$ | | 12 µg/m$^3$ [c] | |

*Notes:*

[a] *On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.75 to 0.70 ppm.*

[b] *As of June 2010, a new 1-hour $SO_2$ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99$^{th}$ percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 $SO_2$ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.*

[c] *The national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m$^3$ to 12 µg/m$^3$ effective December 14, 2012.*

*Sources: CARB, Ambient Air Quality Standards, May 4, 2016, website: http://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed September 2016, CARB: State Area Designation Maps, current as of December 2015 (state and national), website: http://www.arb.ca.gov/desig/adm/adm.htm, accessed September 2016.*

### (2) Existing Local Air Quality

The SCAQMD divides the Basin into 38 source receptor areas (SRAs) in which 38 monitoring stations operate to monitor the various concentrations of air pollutants in the region. As shown in Figure IV.B-1, SCAQMD Air Basin and Source Receptor Areas, the Project Site is located within SRA 1, which covers the Central Los Angeles area. SCAQMD Station No. 087 collects ambient air quality data for SRA 1. This station is

located at 1630 North Main Street in Los Angeles and is located approximately 5 miles southeast of the Project Site. This station currently monitors emission levels of $O_3$, CO, $NO_2$, $SO_2$, $PM_{10}$ and $PM_{2.5}$. Table IV.B-4, Summary of Ambient Air Quality in the Project Vicinity, identifies the national and state ambient air quality standards for the relevant air pollutants, along with the ambient pollutant concentrations that were measured at the SCAQMD Station No. 087 from 2013 to 2016.[6]

According to the air quality data shown in Table IV.B-4, the state one-hour ozone standard was exceeded three days in 2014, two days in 2015, and two days in 2016. The national eight-hour ozone standard was exceeded two days in 2014, six days in 2015, and four days in 2016. The state eight-hour ozone standard was exceeded two days in 2014, six days in 2015, and four days in 2016. The federal 24-hour $PM_{10}$ standard has not been exceeded from 2013 through 2016, while the state 24-hour $PM_{10}$ standard was exceeded one day in 2013, three days in 2014, 26 days in 2015, and 18 days in 2016. In addition, the state annual average standard for $PM_{10}$ was exceeded each year from 2013 to 2016. The national 24-hour $PM_{2.5}$ standard was exceeded for one day in 2013, six days in 2014, seven days in 2015, and two days in 2016. The national and state annual average standards for $PM_{2.5}$ were exceeded in 2014 and 2015. Furthermore, neither national nor state standards for $SO_2$, CO, Lead (Pb) or $NO_2$ have been exceeded from 2013 to 2016.

*(a) Existing TACs*

The SCAQMD released the draft final report of the fourth round of its Basin-wide Multiple Air Toxics Exposure Study (MATES IV) in May 2015. MATES IV estimated the cancer risk from TAC emissions throughout the Basin by conducting a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize health risks in the Basin. MATES IV focused on carcinogenic risk from TACs and did not estimate other health effects from particulate exposures.[7] Based on average measurements at ten fixed monitoring sites, the study estimated 70-year lifetime carcinogenic risk from TACs in the Basin to be approximately 320 to 480 parts per million at individual monitoring sites. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represented approximately 90 percent of the cancer risk with the remaining 10 percent attributing to toxics emitted from stationary sources including industrial

[6] *Ambient air quality concentrations for 2017 have not been released yet.*

[7] *Mortality and other health effects form particulate exposure were conducted as part of the 2016 Air Quality Management Plan.*

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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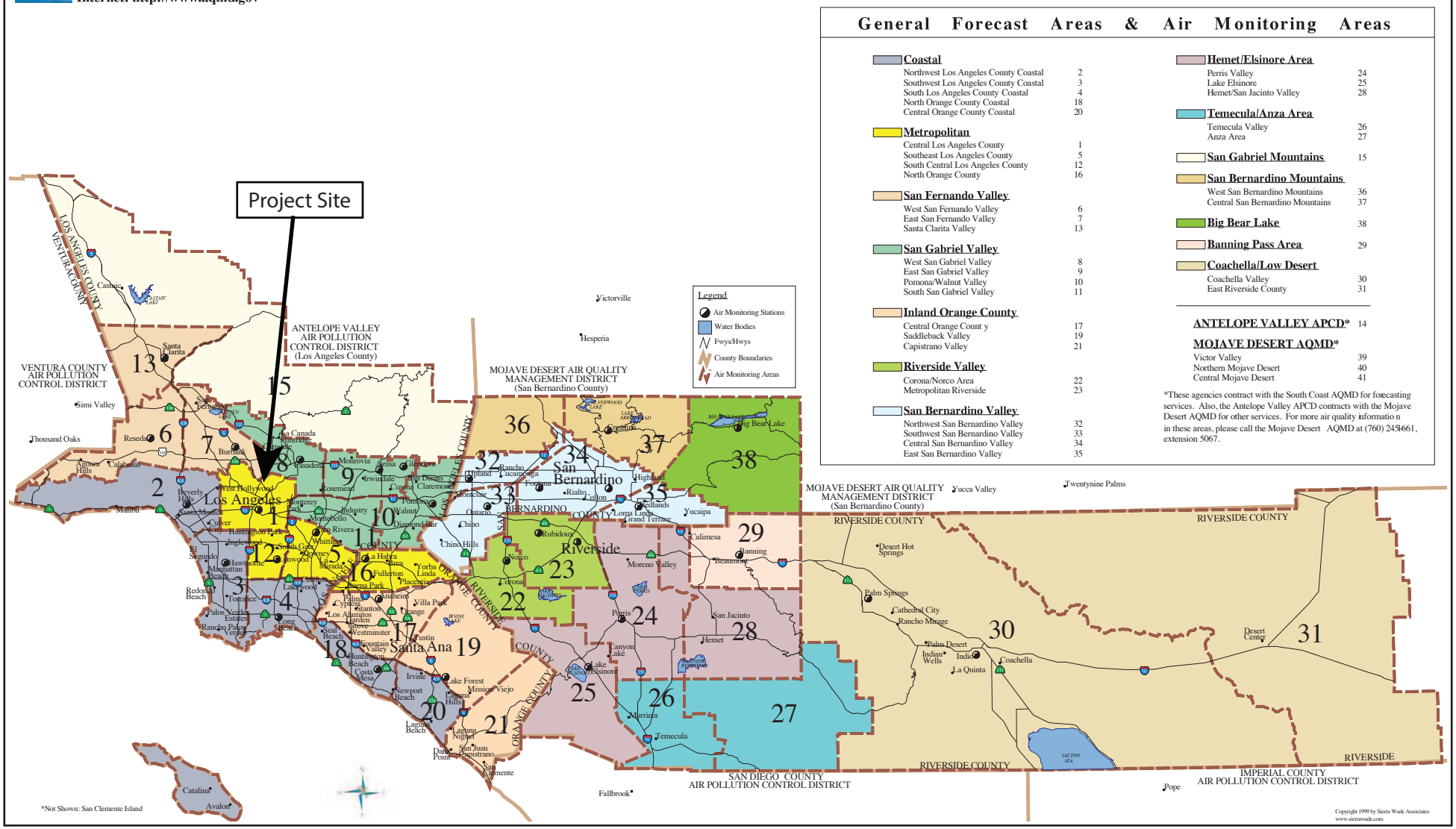



Source: South Coast Air Quality Management District, 1999.

Figure IV.B-1
SCAQMD Air Basin and Source Receptor Areas

## Table IV.B-4
## Summary of Ambient Air Quality in the Project Vicinity

| Air Pollutants Monitored Within SRA 1 Central Los Angeles Area | Year | | | |
|---|---|---|---|---|
| | 2013 | 2014 | 2015 | 2016 |
| **$O_3$** | | | | |
| Maximum 1-hour concentration measured | 0.081 ppm | 0.113 ppm | 0.104 ppm | 0.103 ppm |
| Number of days exceeding national 0.124 ppm 1-hour standard | 0 | 0 | 0 | 0 |
| Number of days exceeding State 0.09 ppm 1-hour standard | 0 | 3 | 2 | 2 |
| Maximum 8-hour concentration measured | 0.069 ppm | 0.094 ppm | 0.074 ppm | 0.078 ppm |
| Number of days exceeding national 0.070 ppm 8-hour standard | 0 | 2 | 6 | 4 |
| Number of days exceeding State 0.07 ppm 8-hour standard | 0 | 7 | 6 | 4 |
| **CO** [a] | | | | |
| Maximum 1-hour concentration measured | -- | 3.0 ppm | 3.2 ppm | 1.9 ppm |
| Maximum 8-hour concentration measured | 2.0 ppm | 2.0 ppm | 1.8 ppm | 1.4 ppm |
| **$NO_2$** | | | | |
| Maximum 1-hour concentration measured | 90.3 ppb | 82.1 ppb | 79.1 ppb | 64.7 ppb |
| Annual average | 21.8 ppb | 22.2 ppb | 22.2 ppb | 20.8 ppb |
| Does measured annual average exceed national 53.4 ppb annual average standard? | No | No | No | No |
| Does measured annual average exceed State 30 ppb annual average standard? | No | No | No | No |
| **$PM_{10}$** | | | | |
| Maximum 24-hour concentration measured | 57 µg/m$^3$ | 66 µg/m$^3$ | 88 µg/m$^3$ | µg/m$^3$ |
| Number of days exceeding national 150 µg/m$^3$ 24-hour standard | 0 | 0 | 0 | 0 |
| Number of days exceeding State 50 µg/m$^3$ 24-hour standard | 1 | 3 | 26 | 18 |
| Annual Average Concentration (Annual Arithmetic Mean (AAM)) | 29.5 µg/m$^3$ | 30.6 µg/m$^3$ | 33.1 µg/m$^3$ | 32.4 µg/m$^3$ |
| Does measured AAM exceed State 20 µg/m$^3$ AAM standard? | Yes | Yes | Yes | Yes |
| **$PM_{2.5}$** | | | | |
| Maximum 24-hour concentration measured | 43.1 µg/m$^3$ | 59.9 µg/m$^3$ | 56.4 µg/m$^3$ | 44.4 µg/m$^3$ |
| Number of days exceeding national 35.0 µg/m$^3$ 24-hour standard | 1 | 6 | 7 | 2 |
| Annual Arithmetic Mean (AAM) | 11.95 µg/m$^3$ | 12.36 µg/m$^3$ | 12.38 µg/m$^3$ | 11.83 µg/m$^3$ |
| Does measured AAM exceed national 12 µg/m$^3$ AAM standard? | No | Yes | Yes | No |
| Does measured AAM exceed State 12 µg/m$^3$ AAM standard? | No | Yes | Yes | No |
| **$SO_2$** [b] | | | | |
| Maximum 1-hour concentration measured | 6.3 ppb | 5.4 ppb | 12.6 ppb | 13.4 ppb |
| 99$^{th}$ Percentile Concentration (1 hour) | 5.2 ppb | 4.4 ppb | 6.3 ppb | 2.5 ppb |
| **Pb** | | | | |
| Maximum monthly average concentration measured | 0.013 µg/m$^3$ | 0.013 µg/m$^3$ | 0.013 µg/m$^3$ | 0.016 µg/m$^3$ |
| Maximum 3-month rolling averages | 0.011 µg/m$^3$ | 0.01 µg/m$^3$ | 0.01 µg/m$^3$ | 0.01 µg/m$^3$ |

*Note: ppm = parts by volume per million molecules of air*
*ppb = parts per billion per billion molecules of air*
*µg/m$^3$=micrograms per cubic meter*

[a] *The federal 8-hour standard (8-hour average CO > 9 ppm) and state 8-hour standard (8-hour average CO > 9.0 ppm) were not exceeded. The federal and state 1-hour standards (35 ppm and 20 ppm) were not exceeded either.*

[b] *The federal SO2 1-hour standard is 75 ppb (0.075 ppm). The state standards are 1-hour average SO2 > 0.25 ppm (250 ppb) and 24-hour average SO2 > 0.04 ppm (40 ppb).Niether the State nor federal standards were exceeded.*

*Source: SCAQMD, Historical Data by Year, website: http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year, accessed July 2018.*

operations such as refineries and metal processing facilities. Approximately 68 percent of the overall cancer risk in the Basin was attributed to diesel particulate emissions. The population-weighted risk in MATES IV shows a 57 percent reduction in modeled air toxics risk compared to the risks in MATES III period (2005).

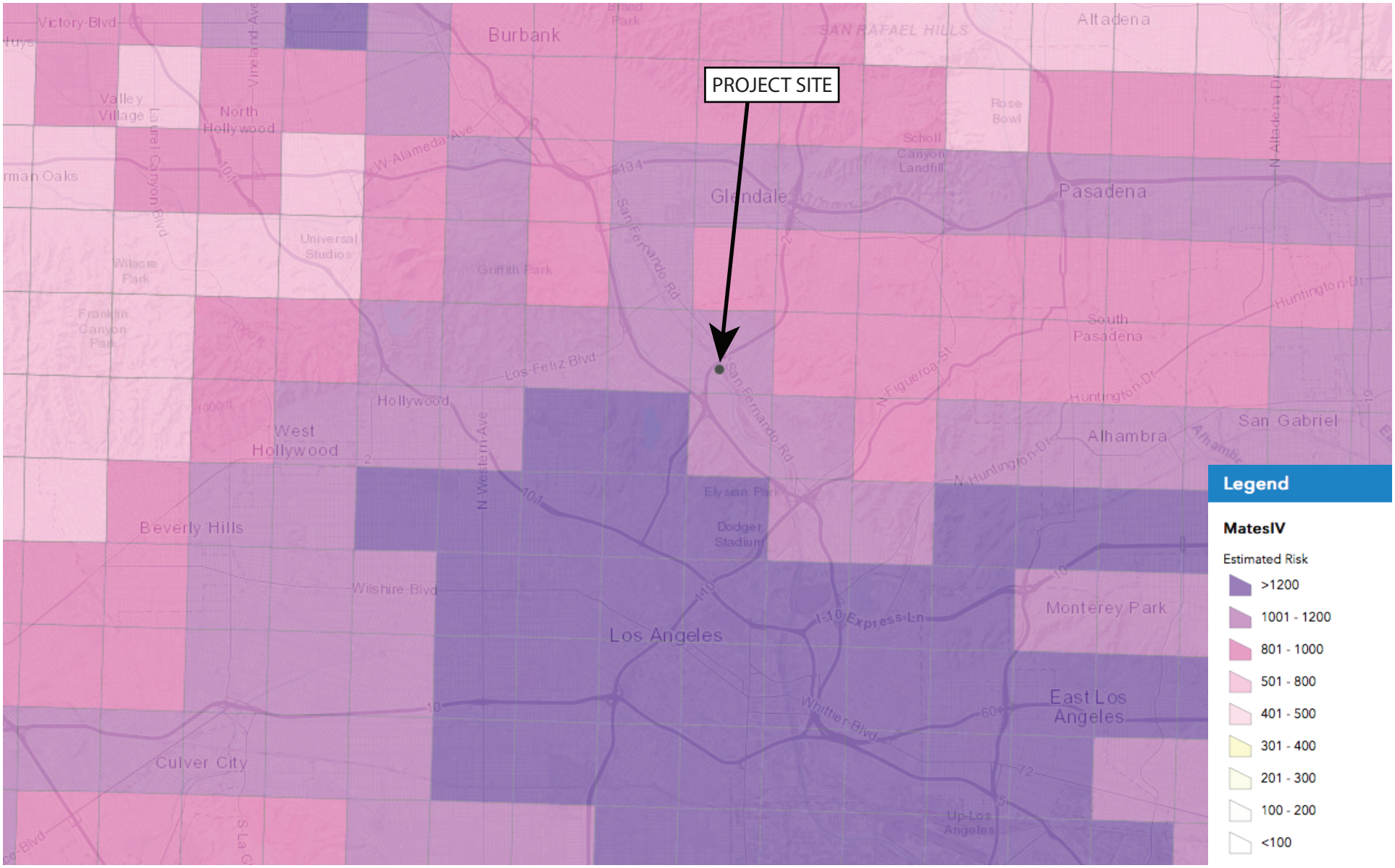
As part of MATES IV, the SCAQMD prepared an interactive map that shows estimates of cancer risks in the Basin from ambient levels of TACs based on the modeling effort to provide insight into relative risks. The map reports estimated cancer risks for discrete two-kilometer-by-two-kilometer grid cells. The cancer risk estimates reported there should not be interpreted as actual rates of disease in the exposed population, but rather as estimates of potential risk, based on a number of conservative assumptions. In general, MATES IV indicates that the highest cancer risks from TACs are found near shipping ports, goods movement sources, and near freeways and other transportation corridors.[8] The Central portion of Los Angeles falls in an estimated range of greater than 1,200 risks per one million. The Project Site falls in an estimated range of 1,001-1,200 risks per one million. See Figure IV.B-2, MATES IV Total Cancer Risk for the Project Site, below. Compared to previous studies of air toxics in the Basin, the MATES IV study found decreasing air toxics exposure from the analysis done in the MATES III time period. While there has been substantial improvement in air quality regarding air toxics emissions and exposures, the risks are still unacceptably high, especially near sources of toxic emissions such as ports and transportation corridors.

*(b) Existing Air Pollutant Sources in Local Vicinity*

The general area surrounding the Project Site is characterized by urban development consisting of industrial, residential, office, educational, and open space. The Project Site is bound by the Los Angeles River to the south, open space and a railway to the east, SR-2 to the west, and a storage facility to the north.

Motor vehicles are the primary source of pollutants in the Project Site vicinity. Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed "CO hotspots." Chapter 5 of the SCAQMD's *CEQA Air Quality Handbook* identifies CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots. The SCAQMD defines

[8] *MATES IV focuses on the carcinogenic risk from exposure to air toxics, and does not estimate mortality or other health effects from particulate exposures. Source: http://www.aqmd.gov/home/library/air-quality-data-studies/health-studies/mates-iv, accessed November 2015.*




Source: SCAQMD, MATES IV Carcinogenic Risk Interactive Map, accessed July 2018.

Figure IV.B-2
MATES IV Total Cancer Risk for Project Site

typical sensitive receptors as residences, schools, playgrounds, childcare centers, athletic facilities, hospitals, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. As shown in Table IV.B-3, the Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. As shown previously in Table IV.B-4, CO levels in the Project area are substantially below the federal and state standards. The maximum CO levels during the past four years shown in Table IV.B-4 are 3.2 ppm (one-hour average) and 2.0 ppm (eight-hour average), compared to the thresholds of 20 ppm (one-hour average) and 9.0 (eight-hour average).

### (2) Existing Project Site Emissions

The Project Site is currently developed with a light industrial facility with its associated surface parking lot. Air pollutant emissions are generated at the Project Site by stationary sources, such as space and water heating, architectural coatings (paint), consumer products and mobile vehicle traffic traveling to and from the Project Site. The average daily emissions generated by the existing uses at the Project Site have been estimated utilizing the California Emissions Estimator Model (CalEEMod) *Version 2016.3.2* recommended by the SCAQMD. As shown in Table IV.B-5, Existing Daily Operational Emissions from the Project Site, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site.

**Table IV.B-5**
**Existing Daily Operational Emissions from the Project Site**

| Emissions Source | Emissions in Pounds per Day | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
| **Summertime (Smog Season) Emissions** | | | | | | |
| Area Source | 2.61 | <0.01 | 0.01 | 0.00 | <0.01 | <0.01 |
| Energy | 0.06 | 0.57 | 0.48 | <0.01 | 0.04 | 0.04 |
| Mobile (Vehicles) | 1.35 | 6.63 | 20.18 | 0.06 | 4.22 | 1.18 |
| ***Total Emissions*** | ***4.02*** | ***7.20*** | ***20.67*** | ***0.06*** | ***4.26*** | ***1.22*** |
| **Wintertime (Non-Smog Season) Emissions** | | | | | | |
| Area Source | 2.61 | <0.01 | 0.01 | 0.00 | <0.01 | <0.01 |
| Energy | 0.06 | 0.57 | 0.48 | <0.01 | 0.04 | 0.04 |
| Mobile (Vehicles) | 1.30 | 6.85 | 18.78 | 0.05 | 4.22 | 1.18 |
| ***Total Emissions*** | ***3.97*** | ***7.42*** | ***19.27*** | ***0.05*** | ***4.26*** | ***1.22*** |

*Calculation data are provided in Appendix C to this Draft EIR.*
*Source: Parker Environmental Consultants, 2017.*

# 3. Project Impacts

## a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact on air quality if it would:

***Threshold (a): Conflict with or obstruct implementation of the applicable air quality plan;***

***Threshold (b): Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;***

***Threshold (c): Expose sensitive receptors to substantial pollutant concentrations; or***

***Threshold (d): Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.***

To assist in answering the Appendix G Threshold questions above and the thresholds provided by AQMD, this analysis utilizes factors and considerations identified below from the 2006 L.A. CEQA Thresholds Guide, as appropriate:

*Construction Emissions*

- Construction emissions exceed the SCAQMD thresholds shown in Table IV.B-6 below.

*Operational Emissions*

- Operational emissions exceed the SCAQMD thresholds shown in Table IV.B-6 below;
- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
    - The Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or

- The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.[9]

- The project creates an objectionable odor at the nearest sensitive receptor.

Furthermore, as set forth in the Thresholds Guide, the determination of significance of a project with respect to toxic air contaminants shall be made on a case-by-case basis, considering the following factors:

(a) The regulatory framework for the toxic material(s) and process(es) involved;

(b) The proximity of the toxic air contaminants to sensitive receptors;

(c) The quantity, volume, and toxicity of the contaminants expected to be emitted;

(d) The likelihood and potential level of exposure; and

(e) The degree to which project design will reduce the risk of exposure.

Additionally, the SCAQMD has adopted criteria for consistency with regional plans and the regional AQMP in its CEQA Air Quality Handbook. Specifically, the indicators of consistency are: 1) whether the project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations; and 2) whether the project would exceed the assumptions utilized in preparing the AQMP.

*(a) Violation of Standards or Substantial Contribution to Air Quality Violations*

As the agency principally responsible for comprehensive air pollution control in the Basin, the SCAQMD recommends that projects should be evaluated in terms of air pollution control thresholds established by the SCAQMD and published in the CEQA *Air Quality Handbook*. These thresholds were developed by the SCAQMD to provide quantifiable levels to which projects can be compared. The most current significance thresholds, shown in Table IV.B-6, SCAQMD Air Quality Significance Thresholds, are used in this analysis.

[9] *This threshold is not listed in Table IV.B-6 but instead comes from page B.2-5 of the City of Los Angeles LA City Thresholds Guide (2006).*

**Table IV.B-6**
**SCAQMD Air Quality Significance Thresholds**

| Mass Daily Thresholds | | |
|---|---|---|
| **Pollutant** | **Construction** | **Operation** |
| NOx | 100 pounds/day | 55 pounds/day |
| VOC | 75 pounds/day | 55 pounds/day |
| $PM_{10}$ | 150 pounds/day | 150 pounds/day |
| $PM_{2.5}$ | 55 pounds/day | 55 pounds/day |
| $SO_x$ | 150 pounds/day | 150 pounds/day |
| CO | 550 pounds/day | 550 pounds/day |
| Pb | 3 pounds/day | 3 pounds/day |
| **Toxic Air Contaminants and Odor Thresholds** | | |
| TACs (including carcinogens and non-carcinogens) | Maximum Incremental Cancer Risk ≥ 10 in 1 million<br>Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million)<br>Hazard Index ≥ 1.0 (project increment) | |
| Odor | Project creates an odor nuisance pursuant to SCAQMD Rule 402 | |
| **Ambient Air Quality for Criteria Pollutants [a]** | | |
| $NO_2$<br><br>1-hour average<br>annual arithmetic mean | SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:<br>0.18 ppm (state)<br>0.03 ppm (state) and 0.534 ppm (federal) | |
| $PM_{10}$<br>24-hour average<br>annual average | 10.4 µg/m$^3$ (construction)[b] & 2.5 µg/m$^3$ (operation)<br>1.0 µg/m$^3$ | |
| $PM_{2.5}$<br>24-hour average | 10.4 µg/m$^3$ (construction)[b] & 2.5 µg/m$^3$ (operation) | |
| $SO_2$<br>1-hour average<br>24-hour average | 0.25 ppm (state) & 0.075 ppm federal – (99$^{th}$ percentile)<br>0.04 µg/m$^3$ (state) | |
| Sulfate<br>24-hour average | 25 µg/m$^3$ (state) | |
| CO<br><br>1-hour average<br>8-hour average | SCAQMD is in attainment; project is significant if it causes or Contributes to an exceedance of the following attainment standards:<br>20 ppm (state) and 35 ppm (federal)<br>9.0 ppm (state/federal) | |
| Lead<br>30-day Average<br>Rolling 3-Month Average | <br>1.5 µg/m$^3$ (state)<br>0.15 µg/m$^3$ (federal) | |

*Notes: ppm = parts per million by volume; µg/m$^3$ = micrograms per cubic meter*

[a] *Ambient air quality thresholds for criteria pollutants based on SCQMD Rule 1303, Table A-2 unless otherwise stated.*

[b] *Ambient air quality threshold based on SCAQMD Rule 403.*

*Source: SCAQMD Air Quality Significance Thresholds, website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, Revision March 2015.*

*(b) Cumulatively Considerable Net Increase of Criteria Pollutants*

The SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[10] The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

*(c) Exposure of Sensitive Receptors to Substantial Pollutant Concentrations*

The SCAQMD currently recommends that impacts to sensitive receptors be considered significant when a project generates localized pollutant concentrations of $NO_2$, CO, $PM_{10}$, or $PM_{2.5}$ at sensitive receptors near a project site that exceeds the localized pollutant concentration thresholds listed above, or when a project's traffic causes CO concentrations at sensitive receptors located near congested intersections to exceed the national or state ambient air quality standards. The roadway CO thresholds would also apply to the contribution of emissions associated with cumulative development.

*(d) Exposure to Objectionable Odors*

A significant impact may occur if objectionable odors occur that would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

## b) Methodology

This analysis focuses on the nature and magnitude of the change in the air quality environment due to the development of the proposed Project. Construction activities would generate air pollutant emissions at the Project Site and on roadways resulting from construction-related traffic. Air pollutant emissions associated with the proposed Project would also result from Project operations and from Project-related traffic volumes. The long-term operation of the Project also has the potential to generate air quality emissions, primarily in the form of day-to-day activities, such as residential uses and motor vehicle

[10] *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.*

emissions from residents, visitors, and employees driving to and from the Project Site. The net increase in Project Site emissions generated by these activities and other secondary sources have been quantitatively estimated and compared to thresholds of significance recommended by the SCAQMD (see Project Impacts subheading, below).

### (1) Construction Emissions

#### *(a) Regional Emissions*

The regional construction emissions associated with the proposed Project were calculated using CalEEMod *Version 2016.3.2*. CalEEMod was developed in collaboration with the air districts of California as a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects.

Construction activities associated with demolition, site preparation, grading, and building construction would generate pollutant emissions. Specifically, these construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. These construction emissions were compared to the thresholds established by the SCAQMD as shown in Table IV.B-6, SCAQMD Air Quality Significance Thresholds. It was assumed that all of the construction equipment used would be diesel-powered.

#### *(b) Localized Emissions*

In addition to the SCAQMD's regional significance thresholds, the SCAQMD has established localized significance criteria in the form of ambient air quality standards for criteria pollutants (see Table IV.B-3). To minimize the need for detailed air quality modeling to assess localized impacts, SCAQMD developed mass-based localized significance thresholds (LSTs) that are the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[11] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: $NO_x$, CO, $PM_{10}$, and $PM_{2.5}$. While the proposed Project would involve surface grading on a Project Site that encompasses approximately 5.7 acres, grading activities would not involve grading on more than 5

[11] *SCAQMD, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

acres per day. Additionally, the proposed Project does not propose any subterranean levels and does not anticipate excavating to levels deep below grade. Thus, the LSTs for a 5-acre site were applied in this analysis. The localized thresholds for all phases of the proposed Project are based on a receptor distance of 25 meters in SCAQMD's SRA 1 for a project site of 5 acres.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each SRA. In terms of $NO_x$ emissions, the two principal forms of $NO_x$ are nitric oxide (NO) and $NO_2$, with the vast majority (95 percent) of the $NO_x$ emissions being comprised of NO. However, because adverse health effects are associated with $NO_2$, the analysis of localized air quality impacts associated with $NO_x$ emissions is focused on $NO_2$ levels. NO is converted to $NO_2$ by several processes, the two most important of which are (1) the reaction of NO with $O_3$, and (2) the photochemical reaction of NO with hydrocarbons. When modeling $NO_2$ emissions from combustion sources, the SCAQMD assumes that the conversion of NO to $NO_2$ is complete at a distance of 5,000 meters from the source.

For $PM_{10}$ LSTs, the thresholds were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For $PM_{2.5}$ LSTs, the thresholds were derived based on a general ratio of $PM_{2.5}$ to $PM_{10}$ for both fugitive dust and combustion emissions. As described in more detail below, the resulting on-site construction emissions generated for each construction phase were analyzed against the applicable LST for each phase.

For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. Thus, according to the SCAQMD, the LSTs for $PM_{10}$ and $PM_{2.5}$, which are based on a 24-hour averaging period, would be appropriate to evaluate the localized air quality impacts of a project on nearby sensitive receptors. Figure IV.B-3, Air Quality Sensitive Receptors, show the locations of nearby sensitive receptors that may be affected by the proposed Project during the construction phase. The sensitive receptors surrounding the Project area include the Los Feliz Charter School for the Arts, the River Lofts multi-family residential properties south of the Los Angeles River (located at 2943 Gleneden Street), and the residential neighborhoods west of the Project Site along Carillon Street. Additionally, the former Taylor Yard G2 parcel and Bow Tie Park property are anticipated to be developed with public park land uses in the future.

Source: Google Earth, Aerial View, February 2016.

Figure IV.B-3
Air Quality Sensitive Receptors

## (2) Operational Emissions

### *(a) Regional Emissions*

Operational emissions associated with the proposed Project were calculated using CalEEMod *Version 2016.3.2* and the information provided in the traffic study prepared for the proposed Project. Operational emissions associated with the Project would be comprised of mobile source emissions and area source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with operation of the proposed Project. Area source emissions are generated by natural gas consumption for space and water heating, and landscape maintenance equipment. To determine if a regional air quality impact would occur, the increase in emissions is compared with the SCAQMD's recommended regional thresholds for operational emissions as shown in Table IV.B-6.

### *(b) Localized Emissions*

#### *(i) On-Site Emissions*

Localized impacts from Project operations include calculation of on-site emissions (e.g., combustion from natural gas usage) using SCAQMD's recommended CalEEMod program and evaluation of these emissions consistent with the SCAQMD's LST methodology.

#### *(ii) Off-Site Emissions*

Potential localized CO concentrations from induced traffic at nearby intersections are also addressed, consistent with the methodologies and assumptions used in the consistency analysis provided in the 2003 AQMP. The analysis prepared for CO attainment in the Air Basin in the SCAQMD's 2003 AQMP can be used to assist in evaluating the potential for CO exceedances in the Air Basin. CO attainment was thoroughly analyzed as part of the 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[12] As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

The analysis prepared for CO attainment in the Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Air Basin. CO attainment

[12] *SCAQMD, Federal Attainment Plan for Carbon Monoxide,1992.*

was thoroughly analyzed as part of the 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[13] In the 2003 AQMP, the SCAQMD conducted CO modeling for the four worst-case intersections in the Basin, including the intersections of Wilshire Boulevard and Veteran Avenue, Sunset Boulevard and Highland Avenue, La Cienega Boulevard and Century Boulevard, and Long Beach Boulevard and Imperial Highway. The SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.[14] This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The emission data provided in Table 4-10 of Appendix V of the 2003 AQMP demonstrated that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.[15] When added to the existing background CO concentrations, the worst-case CO levels in the Basin would be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average), which is well under the SCAQMD's thresholds of significance of 20 ppm (one-hour average), and 9.0 ppm (eight-hour average), respectively. Based on the ratio of the one-hour CO standard (20.0 ppm) and the modeled worse-case emission value (4.6 ppm) the CO threshold of significance would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. Thus, if a study intersection impacted by a project is below 400,000 vehicles a day, it can reasonably be concluded that the project would not generate a significant CO hotspot impact and no further analysis is warranted. If a study intersection impacted by the project exceeds 400,000 vehicles per day, further CO hotspot analysis using California LINE Source Dispersion Model, version 4 (CALINE4) is recommended.

### (3) Toxic Air Contaminants (Construction and Operation)

Potential impacts from TACs were analyzed qualitatively to determine whether a more detailed analysis was necessary (i.e., Health Risk Assessment). Impacts from TAC emissions during construction were evaluated based on the length of construction and the amount of diesel particulate matter emissions. The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. Impacts from TAC emissions from operation were based on the type of land uses and activities proposed by the Project. Land uses that involve the use, storage, or processing of carcinogenic or non-carcinogenic TACs include truck stops and warehouse distribution facilities.

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13 *SCAQMD, 2003 Air Quality Management Plan, 2003.*
14 *Ibid.*
15 *Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).*

## c) Project Design Features

The proposed Project would incorporate sustainability features that are aimed at reducing GHG emissions, which are further discussed in Section IV.D Greenhouse Gas Emissions and Section IV.O, Energy. Although those features focus on reducing GHG emissions and increasing the Project's overall energy efficiency, these sustainability features would also serve to reduce air criteria air pollutant emissions. In addition to the project design features (PDFs) provided in these sections, the following air quality-related project design features are proposed:

**Project Design Feature AQ-PDF-1** No wood burning or natural gas fireplaces shall be provided in the residential units.

## d) Analysis of Project Impacts

***Threshold (a): Would the Project conflict with or obstruct implementation of the applicable air quality plan?***

### (1) Consistency with the 2016 AQMP

This analysis evaluates the two criteria for consistency with regional plans and the regional AQMP adopted by the SCAQMD:

1) Would the Project increase the frequency or severity of existing air quality violations, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMD?

2) Would the Project exceed the assumptions utilized in preparing the AQMP?

    a. Is the Project consistent with the population and employment growth projections on which the AQMP forecasted emission levels are based?

    b. Does the Project include AQ mitigation measures?

    c. To what extent is Project development consistent with the AQMP land use policies?

#### *(a) First Criterion*

With respect to the first criterion, area air quality planning, including the AQMP, assumes that there will be emissions from new growth but that such emissions would not impede the attainment and would actually contribute to the attainment of applicable air quality standards within the Basin if the Project's emissions are below the SCAQMD's regional

thresholds of significance. ***As discussed in more detail below, the Project would not result in construction or operational air quality emissions that exceed the SCAQMD thresholds of significance at the Project level.***

Additionally, the Project's construction-related emissions would be temporary in nature, lasting only for the duration of the construction period and would not have a long-term impact on the region's ability to meet state and federal air quality standards. Furthermore, the proposed Project would be required to comply with applicable SCAQMD rules and regulations for new or modified sources. For example, the Project must comply with SCAQMD Rule 403 for the control of fugitive dust during construction. According to the SCAQMD, the application of water to disturbed areas two times a day has a control efficiency of 55 percent. ***By meeting SCAQMD rules and regulations, Project construction activities would be consistent with the goals and objectives of the AQMP to improve air quality in the Basin.***

With respect to Project operation, the proposed Project would not introduce substantial stationary sources of emissions. CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. ***As discussed in greater detail below, because intersections in the Project vicinity do not experience extremely high traffic volumes (i.e., 400,000 vehicles per day), CO hotspot emissions would be below the applicable thresholds of significance. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.***

An analysis of potential localized operational impacts from on-site activities was conducted. As shown in Table IV.B-11 on page IV.B-50 in the analysis below, localized $NO_2$ as $NO_X$, CO, $PM_{10}$, and $PM_{2.5}$ operational impacts would be less than significant. ***Thus, the proposed Project would not have the potential to increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.***

*(b) Second Criterion*

With respect to the second criterion for determining consistency, a project is consistent, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. The projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends, implementation of regional mitigation measures and incorporating regional planning strategies fro accommodating growth. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the

evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) Project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

The regional growth projections in the 2016 AQMP are the same growth projections identified in the 2016-2040 RTP/SCS. As noted in Section H, Population, Housing, and Employment, based on the estimated growth rate projections calculated from SCAG's 2016 RTP/SCS, it is estimated that the City's population would increase to 4,145,604 persons in 2023; approximately 190,975 additional persons compared to the estimated population in 2016. The 1,090 new residents anticipated to be generated by the proposed Project would result in a negligible increase in the City's population growth and is within SCAG's population growth projections for the City of Los Angeles. When added to the current 2017 population estimate of 3,949,776 persons, the proposed Project's additional 1,127 residents would still be within the total citywide population forecasted for the year 2023. Therefore, the proposed Project's population growth is accounted for in the citywide and regional population projections. ***As discussed in Section IV.H, Population, Housing, and Employment, the proposed Project is consistent with the population and housing projections of the 2016-2040 RTP/SCS for the Los Angeles subregion and would not jeopardize attainment of the air quality conditions projected in the AQMP.***

- Does the project implement feasible air quality mitigation measures?

The proposed Project would comply with any required regulatory compliance measures and control measures enforced by the SCAQMD. For example, as discussed under subsection (ii) Rules and Regulations, of the Regulatory Framework Section above, the proposed Project would be subject to SCAQMD Rule 403 (Fugitive Dust), SCAQMD Rule 1113 (Architectural Coatings), and SCAQMD Rule 1108 (Cutback Asphalt), during construction, and SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations) during project operations. ***The proposed Project would adhere to regulatory compliance measures, which would be consistent with the goals of the 2016 AQMP. The proposed Project does not require any air quality mitigation measures.***

- To what extent is project development consistent with the land use policies set forth in the AQMP?

With respect to land use policies, the proposed Project would serve to implement a number of land use policies and strategies listed in the RTP/SCS and the AQMP. Specifically, the Final 2016-2040 RTP/SCS and 2016 AQMP identifiy the following land use strategies for addressing regional growth:

- Focus new growth around Tranist/High Quality Transit Areas (HQTAs);
- Plan for growth around livable corridors;
- Provide more options for short trips/neighborhood mobility areas;
- Support zero emission vehicles and expand electric vehicle charging stations;
- Support local sustainability planning;
- Protect natural and farm lands;
- Balance growth distribution between 500-foot buffer areas and HQTAs.

The proposed Project would provide a variety of land uses, including multi-family residential, office space, restaurant space, and an urban farm in close proximity to transit, which would help reduce vehicle miles traveled by promoting transit and internal capture trips. The mixed-use nature of the proposed Project would allow for residents of the project and adjacent neighborhoods to access restaurants on-site via the internal pedestrian corrirors without driving. While the Project Site is not within a designated HQTA, the Project Site is within walking distance to public transit. The closest bus stop to the Project Site is Metro Bus Route 603, located approximately 0.3 miles northwest of the Project Site at Fletcher Drive and La Clede Avenue. Metro Bus Route 603 provides service between the Grand/Los Angeles Trade and Technical College (LATTC) Metro Station in the City of Los Angeles and the City of Glendale. Additionally, the proposed Project would include sustainability features that are further discussed in Section IV.D Greenhouse Gas Emissions. The proposed Project would comply with the L.A. Green Code's mandate to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), reduce the overall use of potable water by 20 percent, meet the applicable provisions of the California Energy Code, and comply with the construction and demolition solid waste handling and diversion requirements for construction and operation. Pursuant to the LA Green Building Code at least five (5)% percent of the total code-required parking spaces provided shall be electric vehicle charging stations capable of supporting EVSE. In addition to meeting the minimum code requirements, the proposed urban farm would utilize ecologically sustainable methods in a 100-percent renewable solar energy-powered, climate-controlled urban greenhouse (see GHG-PDF-1 in Section

IV.D, Greenhouse Gas Emissions). ***As such, the proposed Project would support the land use policies set forth in the AQMP and would be consistent with the second criterion for evaluating consistency with the AQMP.***

### (2) Consistency with General Plan Air Quality Element

Local jurisdictions, including the City, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions.

The City's Air Quality Element sets forth the goals, objectives, and policies that guide the City in the implementation of its air quality improvement programs and strategies. A detailed analysis of the consistency of the Project with relevant policies in the City's General Plan Air Quality Element is presented in Table IV.B-7, Project Consistency with Applicable Policies of the General Plan Air Quality Element

As shown in Table IV.B-7, the proposed Project would be consistent with the applicable goals, objectives, and policies set forth in the City's General Plan Air Quality Element.[16] Therefore, impacts related to consistency with the applicable air quality policies in the General Plan would be less than significant. The Project would promote the City of Los Angeles General Plan Air Quality Element goals, objectives, and policies, as provided above under the regulatory framework. Specifically, the Project includes 476 bicycle parking spaces (including 427 long-term spaces and 49 short-term spaces. As such, the Project would provide opportunities for the use of alternative modes of transportation, including access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle miles traveled. In addition, Project residents would have the opportunity to work in the offices on-site and walk to restaurant uses on-site and in the vicinity, which would also reduce trips and VMT. The Project would also include access for pedestrians and bicyclists from Casitas Avenue through the Project Site to the commercial uses oriented towards the LA River and would provide a direct access connection to the future State Park that would be safe and easily accessible.

Based on the above, the Project is consistent with applicable policies of the City of Los Angeles Air Quality Element. As discussed above, the Project would implement project features that would reduce vehicular trips, reduce vehicle miles traveled, and encourage use of alternative modes of transportation.

[16] *While the City's General Plan Air Quality Element has additional policies that are not listed in Table IV.B-7, many policies are directly applicable to the City operations rather than individual development projects in the private sector.*

Refer to Section IV.F, Land Use and Planning, of this Draft EIR, for a consistency analysis of the City's General Plan. As concluded therein, the Project would serve to implement applicable land use policies of the City of Los Angeles pertaining to air quality. Specifically, development of the Project would include implementation of certain features that would serve to reduce vehicular trips, reduce VMT, and encourage use of alternative modes of transportation.

**Table IV.B-7**
**Project Consistency with Applicable Policies of the General Plan Air Quality Element**

| Policy | Consistency Analysis |
|---|---|
| **Policy 1.3.1:** Minimize particulate emissions from construction sites. | **Consistent.** Construction activities associated with the Project would be required to comply with SCAQMD Rule 403—Fugitive Dust, which requires appropriate dust control measures to be implemented during each phase of development. Consequently, particulate emissions at the Project Site during construction of the proposed Project would be minimized. Therefore, the proposed Project would be consistent with this policy. |
| **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic. | **Consistent.** The proposed Project would not utilize any unpaved roads for access. During the earthwork phases of construction, the site would be watered to suppress dust emissions as required through SCAQMD Rule 403. Therefore, the proposed Project would be consistent with this policy. |
| **Policy 3.2.1:** Manage traffic congestion during peak hours. | **Consistent.** The proposed Project's operational peak hour traffic impacts were concluded to be significant and unavoidable after mitigation for two study intersections. The proposed Project would not involve restriping traffic lanes and/or adding traffic lanes to modify intersection lane configurations, and potential changes to signal timing and phasing. Furthermore, the Project's temporary construction impacts would be reduced to less than significant with the implementation of a Construction Traffic Control/Management Plan and other applicable PDFs (see TRANS-PDF-1 through TRANS-PDF-4 and Mitigation Measures TRANS-MM-1 through TRANS-MM-2). Therefore, the proposed Project would be consistent with this policy. |
| **Policy 4.2.2:** Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments. | **Consistent.** The proposed Project would include a mix of residential and commercial uses located in the Northeast Los Angeles community within the City of Los Angeles. The proposed Project would have accessibility to mass transit, jobs, and shopping centers along Fletcher Drive. Additionally, due to the variety of mixed uses proposed by the Project, residents would have access to restaurant, office, and the urban farm, which would provide job opportunities for the future |

**Table IV.B-7**
**Project Consistency with Applicable Policies of the General Plan Air Quality Element**

| | |
|---|---|
| | residents of the proposed Project. Therefore, the proposed Project would be consistent with this policy. |
| **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles. | **Consistent.** The design of the proposed Project would encourage patrons to walk and bike to and from the Project Site. The Los Angeles River Greenway Trail, located on the west side of the L.A. River is accessible via Fletcher Drive. Additionally, the proposed Project would provide connectivity between Casitas Avenue and a pedestrian/bike path through the Project Site and along the Project Site's southern boundary along the LADWP easement and L.A. River. This pedestrian/bike path would provide the opportunity to connect to future bike paths to the State Park property and along the LA River corridor should any bike paths be provided in the future. In addition, through the implementation of the LA Green Building Code, the proposed Project would be required to provide the necessary infrastructure for electric vehicle charging stations, on-site bicycle parking, a bicycle repair kiosk, and shower stations to promote the use of bicycle transportation as an alternative to the vehicle. (See LAMC Section 99.04.106.4.2) Pursuant to the LA Green Building Code at least five (5)% percent of the total code-required parking spaces provided shall be electric vehicle charging stations capable of supporting EVSE. Additionally, Mitigation Measure TRANS-MM-1 requires the applicant to implement the conditions of approval as specified by the Department of Transportation, which includes implementation of a Transportation Demand Management Program (TDM). Thus, the proposed Project would be consistent with this policy. |
| **Policy 4.2.5:** Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects. | **Consistent.** The proposed Project includes a mixed-use residential and commercial development. The proposed Project would include neighborhood-serving commercial retail and restaurant uses that would serve Project residents and the Project vicinity, thereby reducing VMT that would otherwise be generated to travel to similar commercial and restaurant uses elsewhere in the community. In addition, the proposed Project would also include on-site bicycle parking. Therefore, the proposed Project would be consistent with this policy. |
| **Policy 5.1.2: E**ffect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations. | **Consistent.** As discussed in more detail in Section IV.D, Greenhouse Gas Emissions, of this EIR, the implementation of the PDFs, together with the requirements established by the LA Green Building Code (see Section IV.D, Greenhouse Gas |

**Table IV.B-7**
**Project Consistency with Applicable Policies of the General Plan Air Quality Element**

| | |
|---|---|
| | Emissions), would reduce energy consumption for the Project. The proposed Project would be required to exceed the Title 24 2016 Standards, which includes stringent Building Energy Efficiency Standards as mandated by the LA Green Building Code. Therefore, the proposed Project would be consistent with this policy. |
| **Policy 5.1.4:** Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling. | **Consistent.** As stated above, compliance with the LA Green Building Code would reduce energy consumption for the proposed Project. Under the City's Solid Waste Integrated Resources Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030.[17] Pursuant to the LAMC and LA Green Building Code, the Applicant would be required to provide adequate storage areas for the collection and storage of recyclable waste materials. Therefore, the proposed Project would be consistent with this policy. |
| *Source: Policies applicable to the Project were derived from the City's General Plan Air Quality Element, Adopted November 1992; Project consistency analysis by Parker Environmental Consultants, 2017.* | |

***In summary, the proposed Project would be consistent with applicable regional plans pertaining to air quality, including the City of Los Angeles Air Quality Element and the AQMP. Impacts associated with plan consistency would be less than significant.***

### (3) Mitigation Measures

Impacts related to plan consistency would be less than significant. Therefore, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Impacts related to plan consistency would be less than significant without mitigation.

***Threshold (b): Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***

[17] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

### (1) Regional Construction Impacts

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 30 months, with final buildout occurring in 2023. Construction activities associated with the proposed Project would be undertaken in six main activities: (1) demolition; (2) site clearance/preparation; (3) grading/excavation; (4) building construction; (5) paving; and (6) architectural coatings/finishing. The building construction phase includes the construction of the proposed buildings, connection of utilities to the buildings, installation of irrigation systems for landscaping, and landscaping the Project Site.

The demolition and site clearance phases would include the demolition of approximately 117,000 gross square feet of the existing building and the removal of the asphalt paved parking lot (3,000 cubic yards asphalt) on the Project Site. In addition, the site clearance phase would include the removal of street trees, walls, fences, and other parking lot related debris. The demolition and site clearance would be completed in approximately two months.

After the completion of demolition and site clearance, the grading/excavation phase for the proposed Project would occur for approximately two months and would involve the cut and fill of land to ensure the proper base and slope for the building foundations. The proposed Project would require approximately 10,000 cubic yards of soil to be hauled off-site in order to ensure a proper base for the building foundations. To provide additional flexibility during the earthwork and grading phases and the potential for unsuitable fill materials to be encountered during construction, the emissions from construction haul trucks were conservatively based on 10,000 cubic yards of soil export and 10,000 cubic yards of soil import. Haul trips would occur outside of the peak hours and during the permissible hauling hours. In accordance with Section 2485 in Title 13 of the California Code of Regulations (CCR), the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. Additionally, in accordance with Section 93115 in Title 17 of the CCR, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

The building construction phase consists of above grade structures and is expected to occur for approximately 20 months. Upon completion of the structures, paving, architectural coating, and finishing would occur. It is estimated that the paving phase would occur for two months and would include pouring cement for the fire lanes and bike lanes. The architectural coatings would occur over the final four months of Project construction. The proposed Project would comply with SCAQMD Rule 1113, limiting the VOC content of architectural coatings.

All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities as discussed in the Regulatory Framework Section above. As provided in Section 41.40 of the LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday. No construction activities are permitted on Sundays or any national holiday. The proposed Project would comply with these restrictions.

*Haul Route*

For purposes of analyzing the construction-related impacts, it is anticipated that site clearance would involve approximately 10,000 cubic yards of soil and 3,000 cy of asphalt export. Additionally, 10,000 cy of soil would be imported to the Project Site. All truck staging would occur on-site. The proposed haul route traveling to and from I-5 would utilize Casitas Avenue, which is a designated Local Street; Carillon Street, which is designated as a Local Street; and Fletcher Drive, which is a designated Avenue II roadway. The haul routes specified above may be modified in compliance with City policies, provided LADOT and/or Bureau of Street Services approves any such modification.

The analysis of regional daily construction emissions has been prepared utilizing the CalEEMod computer model recommended by the SCAQMD. Table IV.B-8, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on the peak construction day for each of the construction phases, although construction time frames and day-to-day construction activities may vary.

As required by SCAQMD Rule 403 (Fugitive Dust), the calculations of $PM_{10}$ and $PM_{2.5}$ presented in Table IV.B-8 assume that appropriate dust control measures would be implemented as part of the proposed Project during each phase of development. Rule 403 control requirements include, but are not limited to, the following:

- All unpaved demolition and construction areas would be wetted at least twice daily during excavation and construction, and temporary dust covers would be used to reduce dust emissions. Wetting could reduce fugitive dust by as much as 50 percent;
- The construction area would be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind;

**Table IV.B-8**
**Estimated Peak Daily Construction Emissions**

| Emission Source | Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | SO2 | $PM_{10}$ | $PM_{2.5}$ |
| **Demolition** | | | | | | |
| On-Site Fugitive Dust | -- | -- | -- | -- | 2.36 | 0.36 |
| On-Site Off-Road (Diesel Equipment) | 3.31 | 33.20 | 21.75 | 0.04 | 1.66 | 1.54 |
| Off Site (Hauling, Vendor, Worker) | 0.28 | 7.37 | 0.55 | 0.02 | 0.68 | 0.20 |
| ***Total Emissions*** | ***3.59*** | ***40.57*** | ***23.30*** | ***0.06*** | ***4.70*** | ***2.10*** |
| **Site Clearance/Preparation** | | | | | | |
| On-Site Fugitive Dust | -- | -- | -- | -- | 8.25 | 4.48 |
| On-Site Off-Road (Diesel Equipment) | 4.74 | 48.13 | 28.47 | 0.05 | 2.51 | 2.33 |
| Off Site (Hauling, Vendor, Worker) | 0.23 | 4.16 | 1.72 | 0.01 | 0.54 | 0.16 |
| ***Total Emissions*** | ***4.97*** | ***52.29*** | ***30.19*** | ***0.06*** | ***11.30*** | ***6.97*** |
| **Grading/Excavation** | | | | | | |
| On-Site Fugitive Dust | -- | -- | -- | -- | 2.77 | 1.50 |
| On-Site Off-Road (Diesel Equipment) | 2.43 | 26.39 | 16.05 | 0.03 | 1.27 | 1.17 |
| Off Site (Hauling, Vendor, Worker) | 0.63 | 19.72 | 4.75 | 0.06 | 1.54 | 0.47 |
| ***Total Emissions*** | ***3.06*** | ***46.11*** | ***20.80*** | ***0.09*** | ***5.58*** | ***2.90*** |
| **Building Construction** | | | | | | |
| On-Site Off-Road (Diesel Equipment) | 3.29 | 28.21 | 26.89 | 0.04 | 1.65 | 1.58 |
| Off Site (Hauling, Vendor, Worker) | 2.56 | 12.18 | 19.33 | 0.07 | 5.75 | 1.60 |
| ***Total Emissions*** | ***5.85*** | ***40.39*** | ***46.22*** | ***0.11*** | ***7.40*** | ***3.18*** |
| **Paving** | | | | | | |
| On-Site Off-Road (Diesel Equipment) | 1.10 | 11.12 | 14.58 | 0.02 | 0.57 | 0.52 |
| Off Site (Hauling, Vendor, Worker) | 0.07 | 0.04 | 0.47 | <0.01 | 0.17 | 0.05 |
| ***Total Emissions*** | ***1.17*** | ***11.16*** | ***15.05*** | ***0.02*** | ***0.74*** | ***0.57*** |
| **Architectural Coatings/Finishing** | | | | | | |
| On-Site Architectural Coating | 33.37 | -- | -- | -- | 0.00 | 0.00 |
| On-Site Off-Road (Diesel Equipment) | 1.30 | 9.57 | 13.07 | 0.02 | 0.51 | 0.51 |
| Off Site (Hauling, Vendor, Worker) | 0.39 | 0.24 | 2.81 | <0.01 | 1.01 | 0.27 |
| ***Total Emissions*** | ***35.06*** | ***9.81*** | ***15.88*** | ***0.02*** | ***1.52*** | ***0.78*** |
| **SCAQMD Thresholds** | **75** | **100** | **550** | **150** | **150** | **55** |
| **Significant Impact?** | **No** | **No** | **No** | **No** | **No** | **No** |

*Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. Calculation sheets are provided in Appendix C to this EIR.*
*Parker Environmental Consultants, 2018.*

- A wheel washing system would be utilized to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site;
- All clearing, earth moving, or excavation activities would be discontinued during periods of high winds (i.e., greater than 15 miles per hour (mph)), so as to prevent excessive amounts of dust;
- All dirt/soil loads would be secured by trimming, watering or other appropriate means to prevent spillage and dust;

- All dirt/soil materials transported off-site would be either sufficiently watered or securely covered to prevent excessive amount of dust;
- General contractors would maintain and operate construction equipment so as to minimize exhaust emissions;
- Trucks having no current hauling activity would not idle but be turned off:
- Maintain effective cover over materilas; and
- Stabilize sloping surfaces using soil binders until vegetation or ground cover can effectively stabilize slopes.

As shown in Table IV.B-8, the peak daily emissions generated during the construction phases of the proposed Project would not exceed the regional emission thresholds recommended by the SCAQMD. ***Therefore, the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and regional air quality impacts associated with Project-related construction emissions would be less than significant.***

### (2) Localized Construction Impacts

The daily on-site construction emissions generated by the proposed Project are analyzed against the SCAQMD's localized significance thresholds to determine whether the emissions would cause or contribute to adverse localized air quality resulting in impacts to sensitive receptors. The area surrounding the Project Site is mostly populated with existing educational and residential sensitive receptors and one proposed park as a future sensitive receptor. The closest existing sensitive receptor (the Los Feliz Charter School of the Arts) is approximately 230 feet (or approximately 70 meters) to the northeast of the Project Site. The future parkland proposed on the property immediately south of the Project Site would constitute as a future sensitive receptor and is addressed as such in this analysis. The calculations of daily on-site construction emissions assume that appropriate dust control measures would be implemented as part of the proposed Project during each phase of development, as specified by SCAQMD Rule 403 (Fugitive Dust). Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas.

The more conservative receptor distance provided in the SCAQMD's Mass Rate LST Look-up Tables is within 82 feet (25 meters). Although the nearest existing sensitive receptor is located approximately 230 feet (70 meters) from the Project Site, the threshold

for receptors within 82 feet (25 meters) was applied for the proposed Project's localized emissions on sensitive receptors for a conservative analysis to reflect the future parkland proposed on the property to the south. Although the Project Site is approximately 5.7 acres, the construction area would be limited to no more than 5 acres per day. Therefore, the localized significance threshold for a 5-acre site was applied for the proposed Project. As shown in Table IV.B-9, Localized On-Site Peak Daily Construction Emissions, on-site emissions generated by the proposed Project would not exceed the established SCAQMD localized significance thresholds. ***Therefore, the localized air quality impacts resulting from construction emissions associated with the proposed Project would be less than significant.***

**Table IV.B-9**
**Localized On-Site Peak Daily Construction Emissions**

| Construction Phase [a] | Total On-site Emissions (Pounds per Day) | | | |
|---|---|---|---|---|
| | $NO_x$ [b] | CO | $PM_{10}$ | $PM_{2.5}$ |
| Demolition | 33.20 | 21.75 | 1.66 | 1.54 |
| Site Clearance/Preparation | 48.13 | 28.47 | 10.76 | 6.81 |
| Grading/Excavation | 26.39 | 16.05 | 4.06 | 2.67 |
| Building Construction | 28.21 | 26.89 | 1.65 | 1.58 |
| Paving | 11.12 | 14.58 | 0.57 | 0.52 |
| Architectural Coatings/Finishing | 9.57 | 13.07 | 0.51 | 0.51 |
| **SCAQMD Localized Thresholds** | **161** | **1,861** | **16** | **8** |
| ***Potentially Significant Impact?*** | ***No*** | ***No*** | ***No*** | ***No*** |

*[a] The localized thresholds for all phases are based on a receptor distance of 25 meters in SCAQMD's SRA 1 for a Project Site of 5 acres.*
*[b] The localized thresholds listed for $NO_x$ in this table takes into consideration the gradual conversion of $NO_x$ to $NO_2$. The analysis of localized air quality impacts associated with $NO_x$ emissions is focused on $NO_2$ levels as they are associated with adverse health effects.*
*Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix C to this EIR.*

### (3) Regional Operational Impacts

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Site after occupancy. As stated previously, emissions would be generated by motor vehicles traveling to and from the Project Site, energy use, architectural coatings, (paint re-application once every ten years) consumer products, and the operation of landscape maintenance equipment. The analysis of daily operational emissions from the proposed Project has been prepared utilizing CalEEMod. The results of these calculations and associated SCAQMD thresholds are presented in Table IV.B-10, proposed Project Estimated Daily Operational Emissions. As shown in Table IV.B-10, the operational emissions associated with the proposed Project would not

**Table IV.B-10**
**Proposed Project Estimated Daily Operational Emissions**

| Emissions Source | Emissions in Pounds per Day | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
| **Summertime (Smog Season) Emissions** | | | | | | |
| Area Source | 10.79 | 0.40 | 34.65 | <0.01 | 0.19 | 0.19 |
| Energy | 0.16 | 1.40 | 0.70 | <0.01 | 0.11 | 0.11 |
| Mobile (Vehicles) | 4.74 | 20.71 | 63.64 | 0.25 | 21.46 | 5.86 |
| Stationary (Emergency Generators) | 3.28 | 14.68 | 8.37 | 0.01 | 0.48 | 0.48 |
| ***Total Project Emissions*** | ***18.97*** | ***37.19*** | ***107.36*** | ***0.26*** | ***22.24*** | ***18.97*** |
| *Less Existing Project Site Emissions* | *-4.02* | *-7.20* | *-20.67* | *-0.06* | *-4.26* | *-1.22* |
| **Net Project Emissions** | **14.95** | **29.99** | **86.69** | **0.20** | **17.98** | **14.95** |
| **SCAQMD Thresholds** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potentially Significant Impact?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Wintertime (Non-Smog Season) Emissions** | | | | | | |
| Area Source | 10.79 | 0.40 | 34.65 | <0.01 | 0.19 | 0.19 |
| Energy | 0.16 | 1.40 | 0.69 | <0.01 | 0.11 | 0.11 |
| Mobile (Vehicle) Sources | 4.49 | 21.01 | 58.32 | 0.24 | 21.46 | 5.86 |
| Stationary (Emergency Generators) | 3.28 | 14.68 | 8.37 | 0.12 | 0.48 | 0.48 |
| **Total Project Emissions** | ***18.72*** | ***37.49*** | ***102.03*** | ***0.36*** | ***22.24*** | ***18.72*** |
| *Less Existing Project Site Emissions* | *-3.97* | *-7.42* | *-19.27* | *-0.05* | *-4.26* | *-1.22* |
| **Net Project Emissions** | **14.75** | **30.07** | **82.76** | **0.31** | **17.98** | **14.75** |
| **SCAQMD Thresholds** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potentially Significant Impact?** | **No** | **No** | **No** | **No** | **No** | **No** |

*Note: Calculation worksheets are provided in Appendix C to this Draft EIR.*
*Source: Parker Environmental Consultants, 2018.*

exceed the established SCAQMD threshold levels during the summertime (smog season) and wintertime (non-smog season).

Additionally, the proposed Project would meet the energy efficiency requirements of the LA Green Building Code. Specifically, the proposed Project would be designed to exceed 2016 Title 24 Standards, reduce potable water consumption through the use of low-flow water fixtures, and provide ENERGY STAR labeled residential grade equipment and appliances in all new residential units. New on-site facility $NO_X$ emissions would be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources, such as boilers and water heaters) as required by SCAQMD Regulation XIII, New Source Review. ***Therefore, impacts associated with regional operational emissions from the proposed Project would be less than significant.***

## (4) Localized Operational Air Quality Impacts

### *(a) Localized On-Site Operational Emissions*

Localized operational emissions from natural gas, architectural coatings, and consumer products would increase the amount of localized air pollution on the Project Site. Operation of the proposed Project would replace the existing light industrial, warehousing, and production uses on-site. As such, the proposed Project would not introduce new sources of localized emissions to the area. Table IV.B-11, below, shows the net amount of on-site emissions from the operation of the proposed Project. As shown, the proposed Project's on-site localized emissions would not exceed any of the localized thresholds for a site of 5 acres. ***Therefore, localized on-site operational emissions would be less than significant.***

**Table IV.B-11**
**Localized On-Site Peak Daily Operational Emissions**

| Emissions Source [a, b] | Total On-site Emissions (Pounds per Day) | | | |
|---|---|---|---|---|
| | $NO_x$ | CO | $PM_{10}$ | $PM_{2.5}$ |
| Area | 0.40 | 34.66 | 0.19 | 0.19 |
| Energy | 4.00 | 2.88 | 0.31 | 0.31 |
| ***Total On-Site Emissions:*** | ***4.40*** | ***37.54*** | ***0.50*** | ***0.50*** |
| *Less Existing Emissions:* | *-0.57* | *-0.49* | *-0.04* | *-0.04* |
| **NET On-Site Emissions:** | **3.83** | **37.05** | **0.46** | **0.46** |
| **SCAQMD Localized Thresholds** | **161** | **1,861** | **4** | **2** |
| ***Potentially Significant Impact?*** | ***No*** | ***No*** | ***No*** | ***No*** |

*[a] The localized thresholds for all sources are based on a receptor distance of 25 meters in SCAQMD's SRA 1 for a Project Site of 5 acres.*

*[b] Emissions from area and energy sources were analyzed, since mobile sources are off-site localized emissions. Area and energy emissions are the same for winter and summer months. Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix C to this EIR.*

### *(b) Localized Mobile Source Emissions*

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of CO. However, as specified in the methodology subsection above, if a project intersection affected by the Project does not exceed 400,000 vehicles per day, then it can reasonably be concluded that the localized CO emissions would not exceed the SCAQMD's thresholds of significance without any further analysis. At buildout of the Project, the highest average daily volume at an intersection would be approximately 49,940 at the intersection of

Fletcher Drive and Riverside Drive[18], which is significantly below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP. ***Based on a comparative assessment of the traffic volumes at each of the 12 study intersections, improved ambient CO concentrations, and cleaner vehicle emissions, localized operational emissions would be less than significant.***

***In conclusion, the proposed Project's regional and localized construction and operational emissions would not exceed the established SCAQMD thresholds as shown in Table IV.B-8 through Table IV.B-11, above. As such, impacts would be less than significant.***

### (5) Mitigation Measures

Impacts related to the violation of any air quality standard would be less than significant. Therefore, no mitigation measures would be required.

### (6) Level of Significance After Mitigation

Impacts related to the violation of any air quality standard would be less than significant without mitigation.

***Threshold (c): Would the project expose sensitive receptors to substantial pollutant concentrations?***

### (1) Local Air Quality Impacts

As discussed above, the daily on-site construction and operational emissions generated by the proposed Project were analyzed against the SCAQMD's localized significance thresholds to determine whether the emissions would cause or contribute to adverse localized air quality resulting in impacts to sensitive receptors. The area surrounding the Project Site is mostly populated with existing educational and residential sensitive receptors and one proposed park as a future sensitive receptor. The closest existing sensitive receptor (the Los Feliz Charter School of the Arts) is approximately 230 feet (or approximately 70 meters) to the northeast of the Project Site. The future parkland proposed on the property immediately south of the Project Site would constitute as a future sensitive receptor and is addressed as such in this analysis. As shown in Tables IV.B-9 and IV.B-10, above, the proposed Project would not exceed the established SCAQMD localized significance thresholds for either construction or operational

[18] *The highest average ADT was estimated based on highest peak hour trips identified in the Traffic Impact Study under the "Future With Project Scenario" (See Appendix J, Traffic Impact Study, prepared by the Mobility Group, May 2017.)*

emissions. ***Therefore, the localized air quality impacts resulting from construction emissions associated with the proposed Project would be less than significant.***

### (2) Toxic Air Contaminants Impacts

The proposed Project consists of a mixed-use development containing multi-family residential units and commercial uses that would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic TACs. Additionally, as noted in CAPCOA's *Health Risk Assessments for Proposed Land Use Projects* (2009), the SCAQMD recommends that Health Risk Assessments (HRAs) be conducted for substantial sources of diesel particulate matter for developments that include truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units,[19] which does not apply to the proposed Project. As such, no significant toxic airborne emissions would result from the operation of the proposed Project**.**

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 30 months, the proposed Project would not result in a long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. ***Because there is such a short-term exposure period (30 out of 840 months), construction TAC emissions would result in a less-than-significant impact. Therefore, impacts associated with the generation and/or release of TACs would be less than significant.***

With respect to ZI. No. 2427 and the proposed Project's potential to expose future residents to freeway emissions, a Project-specific HRA was prepared to quantify the localized health risks associated with freeway emissions.[20] As further discussed in Section IV.F, Land Use and Planning, the HRA assesses the carcinogenic and non-carcinogenic risks attributable to exposure to poor ambient air quality emissions in proximity to SR-2, and concluded that carcinogenic and non-carcinogenic hazards were predicted to be within acceptable limits. As required by ZI. No. 2427 and the LAMC, the Project will include air filtration systems with filters meeting or exceeding the ASHRAE 52.2 Minimum Efficiency Reporting Value (MERV) of 13 pursuant to LAMC Section

[19] *CAPCOA Planning Managers, Health Risk Assessments for Proposed Land Use Projects, July 2009.*
[20] *The Freeway Adjacent Health Risk Assessment is provided in Appendix M to the Draft EIR.*

99.04.504.6 for new ventilated buildings within 1,000 feet of a freeway (Ordinance 184245). As such, the Project would be consistent with ZI No. 2427 and the LAMC. For a more detailed discussion on the proposed Project's consistency with ZI. 2427, See Section IV.F, Land Use and Planning.

***In conclusion, on-site localized emissions from the proposed Project's construction and operation would not exceed the established SCAQMD localized thresholds. Therefore, localized construction and operational related air quality impacts would be considered less than significant. Additionally, potential air toxic impacts to sensitive receptors from Project TAC emissions would also be less than significant.***

### (3) Mitigation Measures

Impacts related to the exposure of sensitive receptors to substantial pollutant concentrations would be less than significant. Therefore, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Impacts related to the exposure of sensitive receptors to substantial pollutant concentrations would be less than significant without mitigation.

***Threshold (d): Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

The proposed Project does not include any of the uses identified by the SCAQMD as being associated with odors, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding. In addition, SCAQMD BACT Guidelines would limit potential objectionable odor impacts during the proposed Project's long-term operations phase.

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents, as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD rules, no construction activities or materials that would create a significant level of objectionable odors are proposed.

The proposed Project would not create objectionable odors affecting a substantial number of people during construction or long-term operation. The proposed Project's residential uses would not generate a source of odors. Odors from garbage chutes and enclosed

refuse containers would be controlled through standard best management practices and ongoing building maintenance procedures. While restaurant-related uses have the potential to generate odors from cooking and disposal of organic waste, restaurant operators would be subject to SCAQMD Rule 1138, which requires the installation of odor-reducing equipment. ***Therefore, a less-than-significant impact would occur with respect to the creation of objectionable odors.***

***In conclusion, the proposed Project's adherence to SCAQMD Rule 1138 and SCAQMD BACT Guidelines would limit potential objectionable odor impacts during the proposed Project's long-term operation. Therefore, impacts associated with operational odors from the proposed Project would be less than significant.***

## e) Cumulative Impacts

***Threshold (c): Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including release in emissions which exceed quantitative thresholds for ozone precursors);***

### (1) AQMP Consistency

Cumulative development can affect implementation of the AQMP. The AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the AQMP would not be obstructed by such growth, and cumulative impacts would be less than significant. Since the proposed Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. As discussed in Section IV.H, Population, Housing, and Employment, of this Draft EIR, the population and housing growth generated by the proposed Project and related projects would be within SCAG's growth projections. In addition, each related project would be required to show consistency with the AQMP. ***Thus, cumulative impacts related to conformance with the AQMP would be less than significant.***

### (2) Construction Impacts

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As shown in Table IV.B-8 above, construction-related daily emissions at the Project Site would not exceed SCAQMD's regional significance thresholds. Thus, the proposed Project's contribution to cumulative construction-related regional emissions would not be cumulatively considerable and, therefore, would be less than significant. Construction of the proposed Project also would have a less-than-significant impact with regard to localized emissions. ***Therefore, the Project's contribution to cumulative air quality impacts due to localized emissions would also not be cumulatively considerable and, therefore, would be less than significant.***

With respect to TACs, the greatest potential for TAC emissions resulting from the development of related projects would involve diesel particulate emissions associated with heavy equipment during construction. Construction activities are temporary and short-term events; thus, construction activities resulting from the development of each related project would not result in a long-term substantial source of TAC emissions. Moreover, it is not meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations. ***As such, given the short-term nature of these activities, cumulative TAC emission impacts during construction would be less than significant.***

With respect to odor impacts, potential sources that may emit odors during construction activities resulting from the development of each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of VOCs from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD rules, it is anticipated that construction activities and materials used in the construction of the proposed Project and related projects would not combine to create objectionable odors. ***Thus, cumulative odor impacts would be less than significant.***

### (3) Operational Impacts

With respect to operational emissions, the SCAQMD has indicated that if an individual project results in air emissions of criteria pollutants (CO, ROG, $NO_x$, $SO_x$, $PM_{10}$, and $PM_{2.5}$) that exceed the SCAQMD recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the region is in non-attainment under an applicable federal or state ambient air quality standard. As discussed previously, the operational emissions

associated with the proposed Project would not exceed the established SCAQMD threshold levels during the summertime (smog season) and wintertime (non-smog season). ***Therefore, the cumulative impact of the proposed Project for operational emissions would be considered less than significant.***

As discussed previously, the Basin has been in attainment for CO emissions since 2003. In the 2003 AQMP, the SCAQMD demonstrated that CO hotspot emissions at four of the highest traveled intersections in the Basin were below the thresholds of significance. Thus, since the Basin has remained in attainment status since 2003, and the volume of traffic at the 12 study intersections is below the 100,000 trips per day, it is reasonable to conclude that cumulative localized CO impacts would be less than significant without further analysis.

With respect to TAC emissions, neither the proposed Project nor any of the related projects (which are largely residential, retail/commercial, and light industrial uses), would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects (which are primarily residential, retail and office uses) would not result in a cumulative impact requiring further evaluation. Pursuant to California Assembly Bill 1807, which directs the CARB to identify substances as TAC and adopt airborne toxic control measures (ATCMs) to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. ***In addition, the proposed Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines and, thus, would not contribute to a cumulative impact.***

According to the SCAQMD's CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Based on a review of the related projects (which are primarily residential, retail, and office uses), none of these related projects would be associated with odor complaints. Neither the Project nor any of the related projects have a high potential to generate odor impacts. Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations) to implement BACT requirements to limit potential objectionable odor impacts to a less-than-significant level. Thus, potential

odor impacts from related projects are anticipated to be less than significant. ***The proposed Project would not result in odor impacts and, thus, would not have a cumulative impact.***

***In conclusion, cumulative construction and operational impacts would result in a less than significant impact.***

### (4) Mitigation Measures

Cumulative construction and operational impacts would result in a less-than-significant impact. As such, no mitigation measures are required.

### (5) Level of Significance after Mitigation

Cumulative construction and operational impacts would be less than significant without mitigation.

# Environmental Impact Analysis

# C. Geology and Soils

## 1. Introduction

The information and analysis in this section is based primarily on the following report, which is included as Appendix D to this Draft EIR:

- City of Los Angeles Department of Building and Safety, Soils Report Approval Letter, VTT 74366//Southern Pacific Classification Yard Tract (M P 147-22/26), 2750 – 2800 W. Casitas Ave., April 7, 2017 (Appendix D.1).
- Preliminary Geotechnical Report for Proposed Bow Tie Yard Lofts and adjacent Parking Structure, Vesting Tentative Tract 74366, 2750 to 2800 West Casitas Avenue, Los Angeles, California, (Geotechnical Investigation), prepared by LGC Geotechnical, Inc., dated January 16, 2017 (Appendix D.2).
- Natural History Museum of Los Angeles County, Paleontological Resources for the Proposed Bow Tie Yard Lofts Project, in the City of Los Angeles, Los Angeles County, February 21, 2017 (Appendix D.3).

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) Alquist-Priolo Earthquake Fault Zoning Act

California's Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code § 2621 et seq.), originally enacted in 1972 as the Alquist-Priolo Special Studies Zone Act and renamed in 1994, is intended to reduce the risk of life and property from surface fault rupture during earthquakes. The Alquist-Priolo Act prohibits the location of most types of structures intended for human occupancy across the traces of active faults and strictly regulates construction in the corridors along active faults (Earthquake Fault Zone). It also defines criteria for identifying active faults, giving legal weight to terms such as "active," and establishes a process for reviewing building proposals in and adjacent to Earthquake Fault Zones. Under the Alquist-Priolo Act, fault zones are defined, and construction along or across them is strictly regulated if they are "sufficiently active" and "well-defined." A

fault is considered sufficiently active if one or more of its segments or strands shows evidence of surface displacement during Holocene time (defined for the purposes of the Act as within the last 11,000 years). A fault is considered well-defined if its trace can be clearly identified by a trained geologist at the ground surface or in the shallow subsurface, using standard professional techniques, criteria, and judgment.

### (2) Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (Public Resources Code [PRC] Sections 2690-2699.6) is intended to reduce the damage resulting from earthquakes. While the Alquist-Priolo Act addresses surface fault rupture, the Seismic Hazards Mapping Act addresses other earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. Its provisions are similar in concept to those of the Alquist-Priolo Act; the State is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards; and cities and counties are required to regulate development within mapped Seismic Hazard Zones.

Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Specifically, cities and counties are prohibited from issuing development permits for sites in Seismic Hazard Zones until appropriate site-specific geologic or geotechnical investigations have been carried out, and measures to reduce potential damage have been incorporated into the development plans.

### (3) California Building Standards Code

The State of California's minimum standards for structural design and construction are provided in the California Building Standards Code (CBSC) (California Code of Regulations Title 24). The CBSC is based on the International Building Code (IBC), which was developed by the International Code Council (ICC) and first published in 1997. The IBC is used widely throughout the United States (generally adopted on a state-by-state or district-by-district basis) and has been modified for California conditions with numerous, more detailed or more stringent regulations. The CBSC requires that "classification of the soil at each building site will be determined when required by the building official" and that "the classification will be based on observation and any necessary test of the materials disclosed by borings or excavations." In addition, the CBSC states that "the soil classification and design-bearing capacity will be shown in the building plans, unless the foundation conforms to specified requirements." The CBSC provides standards for various aspects of construction, including but not limited to: excavation, grading, and earthwork construction; fills and embankments; expansive soils; foundation investigations; and liquefaction potential and soil strength loss. The 2016

edition of the CBSC, which became effective on January 1, 2017, incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. In accordance with California law, the proposed Project would be required to comply with all provisions of the CBSC.

### (4) City of Los Angeles General Plan Safety Element

The City's Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster, and initial recovery from a natural disaster. The Safety Element outlines the historic evolution in Los Angeles of local, state, and federal roles, particularly relative to mitigation of and response to natural disasters.

The Safety Element emphasizes seismic safety issues because seismic events present the most widespread threat of devastation to life and property. The City adopted a series of ordinances, which required retrofitting of certain existing structures and for new construction, as well as for the evaluation of structures by a structural engineer during the construction process. The Northridge earthquake underscored the need for thorough, on-going building inspections to assure construction of buildings according to City of Los Angeles Building Code.

PRC Code Section 2699 requires that a safety element "take into account" available seismic hazard maps prepared by the State Geologist pursuant to the Alquist-Priolo Earthquake Fault Zoning Act of 1972, subsequently amended (PRC Sections 2621-2630, originally known as the Alquist-Priolo Special Studies Zones Act) and the Seismic Hazard Mapping Act of 1990, subsequently amended (PRC Sections 2690-2699.6 and 3720-3725). The Hazard Mapping Act requires the State Geologist to map areas subject to amplified ground shaking (or conditions which have potential for amplified ground shaking), liquefaction, and landslide hazard areas.

### (5) Los Angeles Building Code

Earthwork activities, including grading, are governed by the Los Angeles Building Code, which is contained in Los Angeles Municipal Code (LAMC), Chapter IX, Article 1. Specifically, Section 91.7006.7 includes requirements regarding import and export of material; Section 91.7010 includes regulations pertaining to excavations; Section 91.7011 includes requirements for fill materials; Section 91.7013 includes regulations pertaining to erosion control and drainage devices; Section 91.7014 includes general construction requirements as well as requirements regarding flood and mudflow protection; and Section 91.7016 includes regulations for areas that are subject to slides and unstable soils. Additionally, Section 91.1803 includes specific requirements addressing seismic

design, grading, foundation design, geologic investigations and reports, soil and rock testing, and groundwater. As noted above, the Los Angeles Building Code incorporates by reference the California Building Code, with City amendments for additional requirements. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code.

#### (6) Paleontological Resources

PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, California Penal Code Section 622.5 sets the penalties for the unlawful damage or removal of paleontological resources. State regulations mandate protection of paleontological resources on public lands, and CEQA requires evaluation of impacts to paleontological sites. Paleontological resources are also subject to certain state regulations for historical resources.

## b) Existing Conditions

### (1) Subsurface Geology at the Project Site

#### *(a) Background*

The Project Site currently consists of an existing two-story 117,000-square-foot light industrial/production/warehouse building and associated parking. The current building was constructed in 1999.

Based on a review of prior Geotechnical Investigation reports conducted for previous development on the Project Site, earthwork removals within the existing building footprint area ranged from approximately 12 feet to 23 feet below grade. [1] Soil removals were also documented for the retaining wall along the northern property line. The compaction report was subsequently approved as primary structural fill by the City of Los Angeles Department of Building and Safety, with the approximate limits of the previously placed primary structural fill shown in Figure IV.C-1, Geotechnical Map. The City of Los Angeles approvals and the compaction report for the existing warehouse building are provided in Appendix F of the Geotechnical Investigation (See Appendix D to this Draft EIR).

[1] *Duco Engineering, Inc., Report of Compaction Tests, Proposed Industrial Building N/W portion of Lot 1 (ARB-3) Tract (MP 147-22/26) Southern Pacific Classification Yard, 2800 Casitas Avenue, Los Angeles, CA Job No. 98-67, January 8, 1999. (see Appendix F to the Geotechnical Investigation provided in Appendix D to this Draft EIR).*

*(b) Subsurface Exploration and Conditions*

Based on a subsurface evaluation performed by LGC Geotechnical, site soils are generally dense to very dense sands and interbedded with occasional very stiff fine-grained (i.e., silts and/or clays) layers of varying thicknesses.[2] The site contains previously placed documented compacted fill and undocumented compacted fill of varying thicknesses over Quaternary alluvial fan deposits to the maximum explored depth.[3] The locations of the Geotechnical Investigation borings and cross sectional lines, and subsurface materials are shown in Figure IV.C-1, Geotechnical Map. The cross sectional exhibits are shown in Figure IV.C-2, Cross Sections A-A' through D-D'. For details on the stratigraphy at the exploration locations, refer to the boring logs provided in Appendix B of the Geotechnical Investigation (Appendix D of this Draft EIR).

### (2) Groundwater

Groundwater was encountered during the site explorations and borings at depths ranging from approximately 37 feet to 41 feet below existing grade. Historic high groundwater is estimated to be about 25 feet below existing grade[4], as illustrated in Figure IV.C-3, Groundwater Contour Map. It should be noted that higher localized and seasonal perched groundwater conditions may accumulate below the surface. In general, groundwater conditions below any given site may vary over time depending on numerous factors, including seasonal rainfall.

### (3) Seismicity and Existing Seismic Hazards

Seismic hazards include ground surface fault rupture, ground motion, liquefaction, settlement, lateral spreading, and seismically-induced slope instabilities. Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region include ground lurching and shallow ground rupture, soil liquefaction, and dynamic settlement. These secondary effects of seismic shaking are a possibility throughout the Southern California region and are dependent on the distance between the site and causative fault and the on-site geology. The nearby major active faults that could produce these secondary effects include the Puente Hills Fault,

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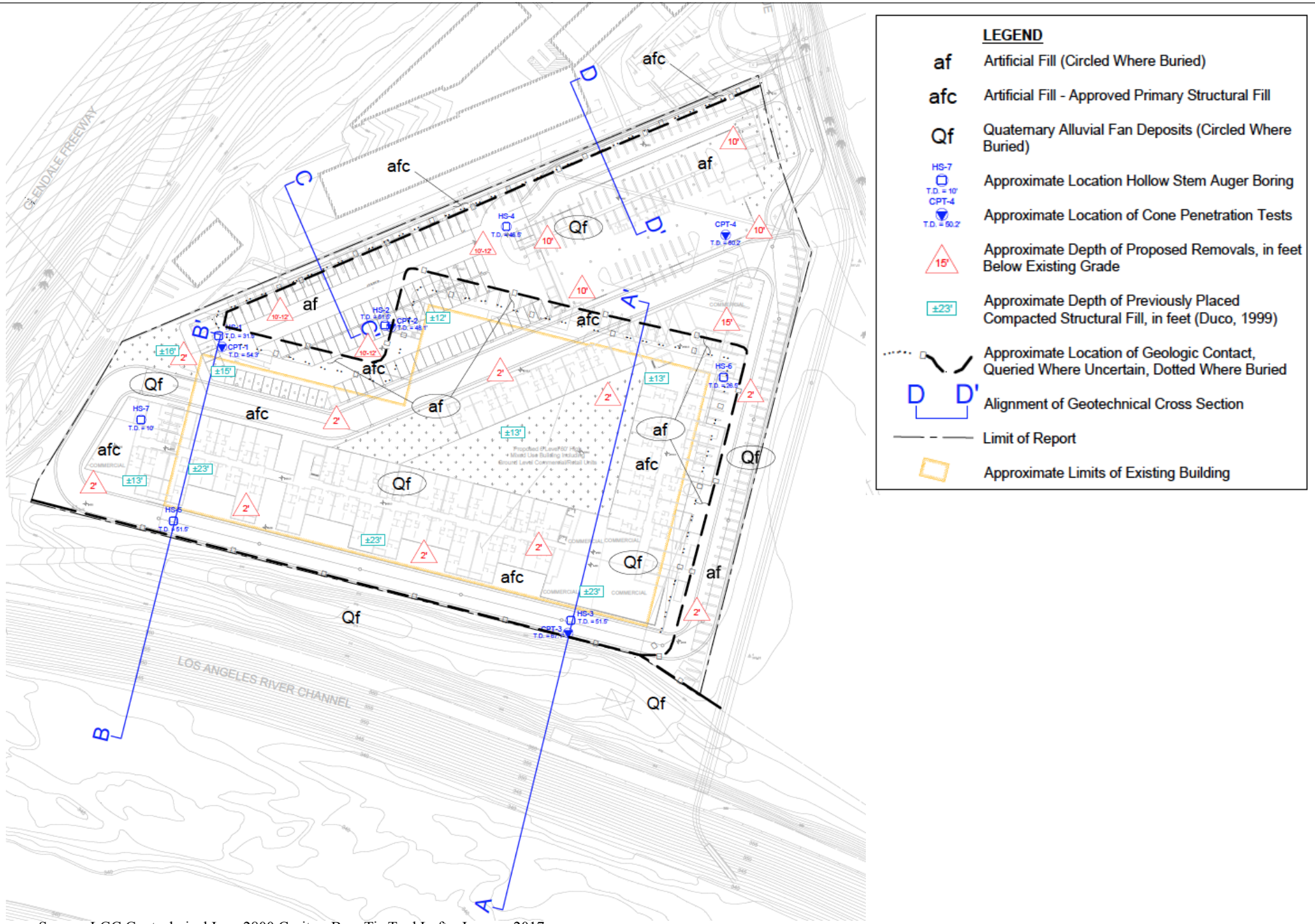
2 *Preliminary Geotechnical Report for Proposed Bow Tie Yard Lofts and adjacent Parking Structure, Vesting Tentative Tract 74366, 2750 to 2800 West Casitas Avenue, Los Angeles, California, ("Geotechnical Investigation"), prepared by LGC Geotechnical, Inc., dated January 16, 2017 (Appendix D.1).*

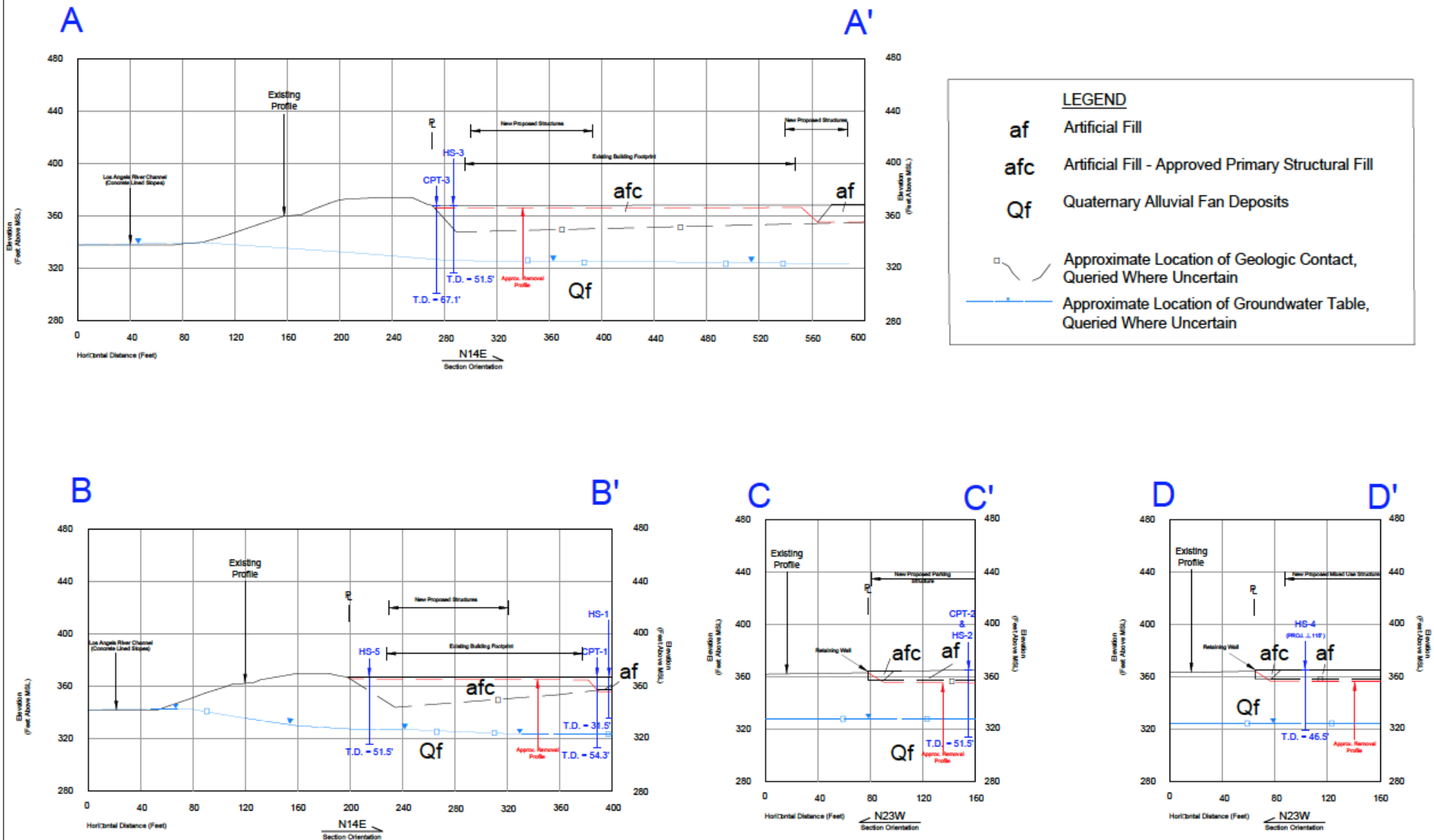
3 *Ibid.*

4 *State of California, Department of Conservation, Division of Mines and Geology 1998.*




Source: LGC Geotechnical Inc., 2800 Casitas, Bow Tie Tard Lofts, January 2017.

**Figure IV.C-1**
**Geotechnical Map**




Source: LGC Geotechnical Inc., 2800 Casitas, Bow Tie Tard Lofts, January 2017.

**Figure IV.C-2**
**Cross Sections A-A' through D-D'**

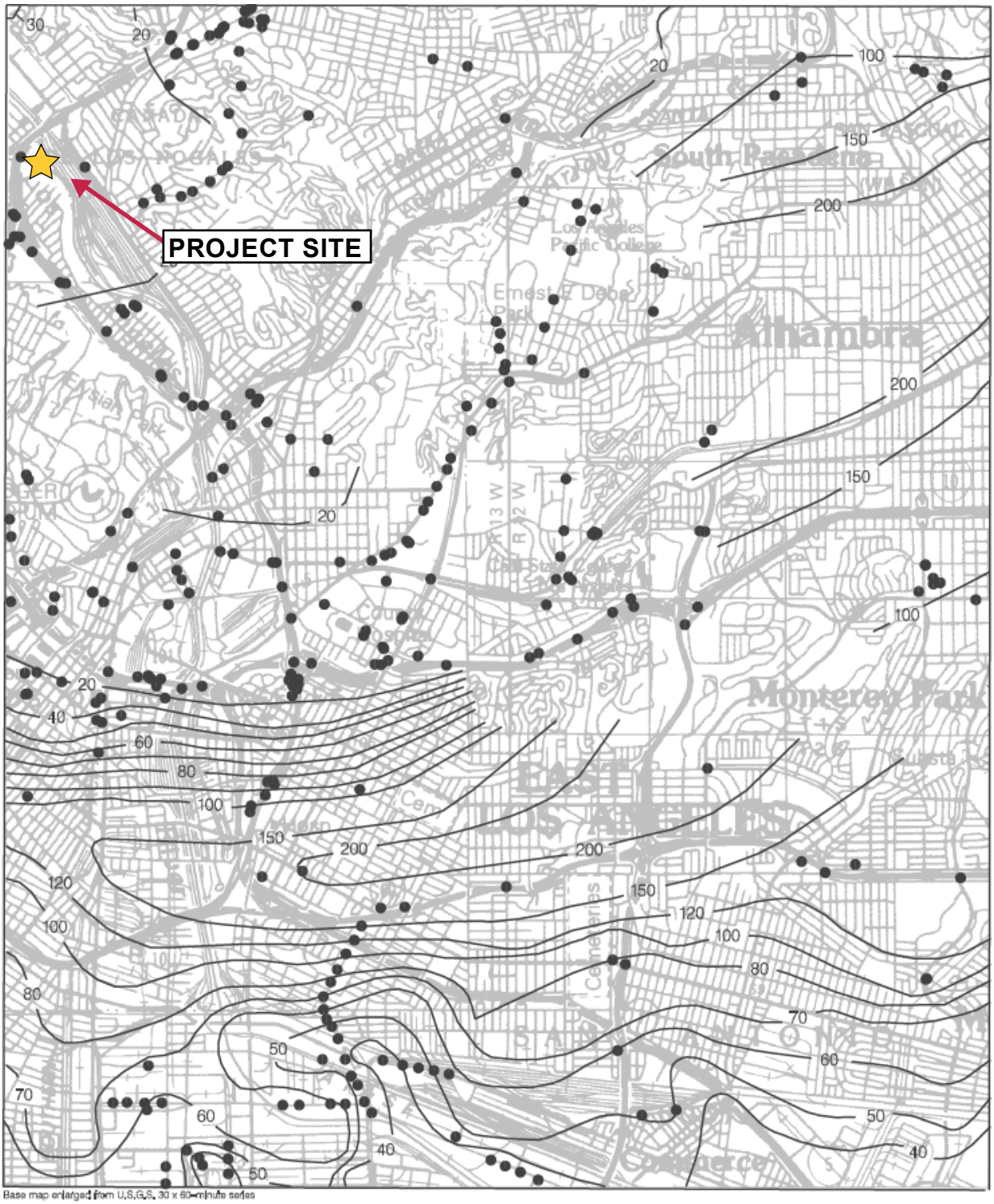



Plate 1.2 Historically Highest Ground Water Contours and Borehole Log Data Locations, Los Angeles Quadrangle.

● Borehole Site

30 Depth to ground water in feet

ONE MILE
SCALE

Source: State of California, Department of Conservation, Division of Mines and Geology, 1998.

Figure IV.C-3
Groundwater Contour Map

Hollywood Fault, Raymond Fault, Elysian Park Fault (Upper) and San Andreas Faults, among others. A discussion of these secondary effects is provided in the following sections.

*(a) Fault Rupture*

The Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone[5] or a fault rupture study zone identified in the Safety Element of the City of Los Angeles General Plan published in 1996.[6] No known active faults are known to cross the Project Site. A fault is considered "active" if evidence of surface rupture in Holocene time (the last approximately 11,000 years) is present. The nearby major active faults that could produce these secondary effects include the Puente Hills Fault, Hollywood Fault, Raymond Fault, Elysian Park Fault (Upper) and San Andreas Faults, among others.

*(b) Ground Shaking*

The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The closest active fault is the Hollywood Fault, located approximately 0.5 mile from the Project Site. In general, ground shaking is greatest near the epicenter, increases with increasing magnitude, and decreases with increasing distance. However, ground shaking measured at a given site is influenced by a number of criteria, including depth of the epicenter, proximity to the projected or actual fault rupture, fault mechanism, duration of shaking, local geologic structure, source direction of the earthquake, underlying earth material, and topography.

*(c) Liquefaction and Dynamic Settlement*

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. Liquefaction occurs when three general conditions coexist: 1) shallow groundwater; 2) low density non-cohesive (granular) soils; and 3) high-intensity ground motion. Studies indicate that saturated, loose to medium dense, near surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low

[5] *California Geologic Survey, Earthquake Zones of Required Investigation, Los Angeles Quadrangle, released March 25, 1999, revised June 15, 2017, website: http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/LOS_ANGELES_EZRIM.pdf, accessed July 2018.*

[6] *City of Los Angeles, Department of City Planning, Safety Element, adopted November 26, 1996, website: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed July 2018.*

to negligible liquefaction potential.[7] In general, cohesive soils are not considered susceptible to liquefaction. Effects of liquefaction on level ground include settlement, lateral spreading, sand boils, and bearing capacity failures below structures. Dynamic settlement of dry loose sands can occur as the sand particles tend to settle and densify as a result of a seismic event.

As shown in Figure IV.C-4, Seismic Hazard Zones Map of Los Angeles Quadrangle, below, the Project Site is located within a State of California Seismic Hazard Zone for liquefaction potential.[8] As such, a liquefaction analysis was performed as part of the field exploration conducted for the Project. Due to the dense to very dense nature of soils encountered during the field exploration at the Project Site, the on-site soils are not considered susceptible to liquefaction.

*(d) Lateral Spreading*

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. Due to the dense to very dense nature of soils encountered during the field exploration at the Project Site, on-site soils are not considered susceptible to liquefaction and lateral spreading.

*(e) Landslides and Slope Instabilities*

Landsliding may be triggered by earthquakes, rainstorms, or construction-related activities (e.g., improper grading, structural design, landscaping, etc.). The Project Site is located within a highly urbanized area within the City of Los Angeles. The elevation of the Project Site is approximately 365 feet above mean sea level, and the topography is relatively flat.[9] The Project Site is not located within a Seismic Hazard Zone for

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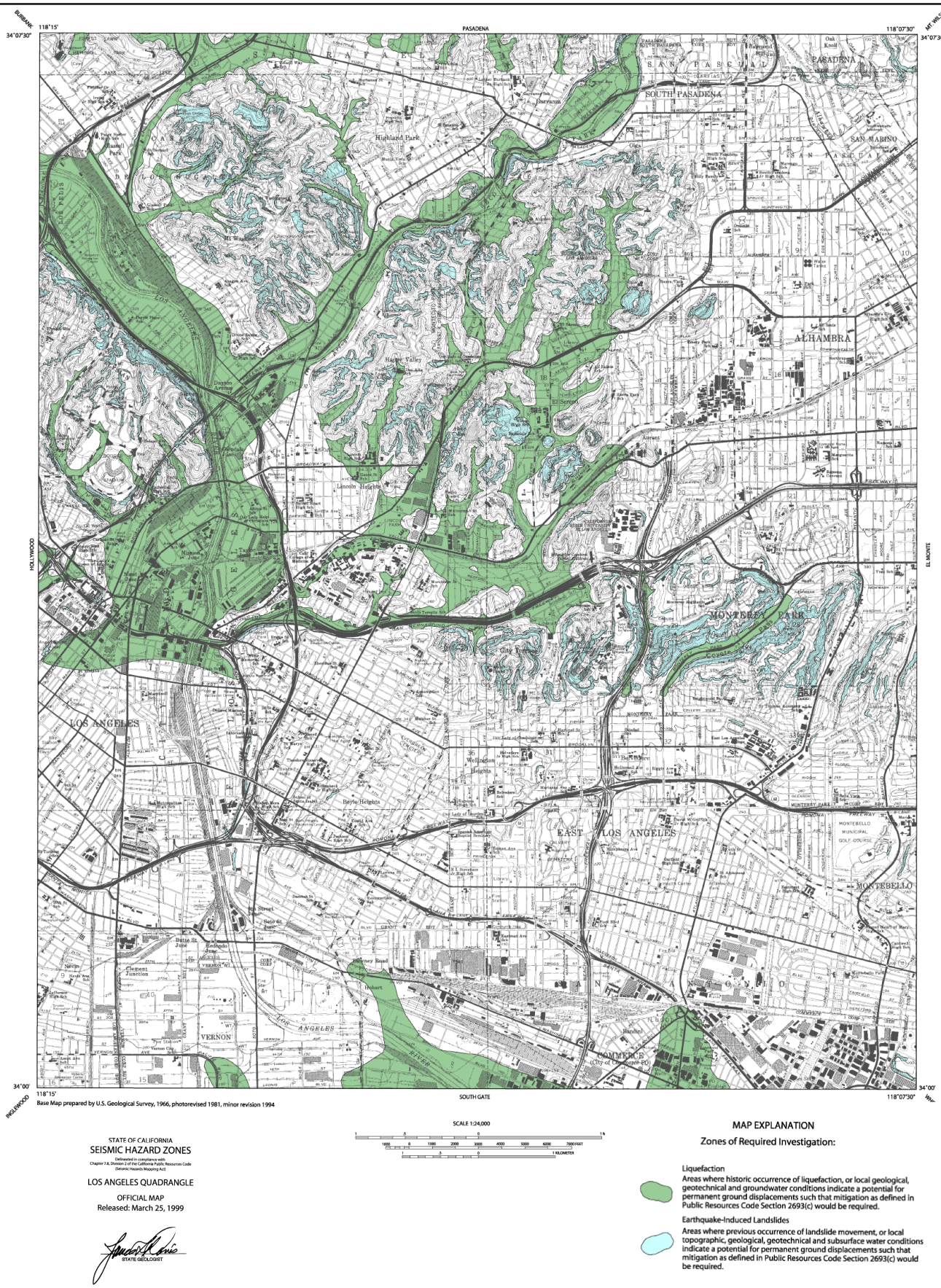
[7] *Bray, J.D., and Sancio, R. B., 2006, Assessment of liquefaction susceptibility of fine-grained soils, Journal of Geotechnical and Geoenvironmental Engineering, ASCE, pp. 1165-1177, dated September 2006.*

[8] *California Geologic Survey, Earthquake Zones of Required Investigation, Los Angeles Quadrangle, released March 25, 1999, revised June 15, 2017, website: http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/LOS_ANGELES_EZRIM.pdf, accessed July 2018.*

[9] *Leighton and Associates, Inc., Phase I Environmental Site Assessment, 2750 and 2800 Casitas Avenue, Los Angeles, California, May 31, 2016. (Appendix F1 of this Draft EIR)*




Source: State of California, Department of Conservation, Division of Mines and Geology, March 25, 1999.

Figure IV.C-4
Seismic Hazards Zones Map of Los Angeles Quadrangle

earthquake-induced landslides.[10] Further, based on the "Landslide Inventory & Hillside Areas" map of the City of Los Angeles Safety Element, the Project Site is not located within an area of potential for seismically-induced landslides.[11]

*(f) Subsidence*

Land subsidence is a gradual settling or sudden sinking of the ground surface owing to subsurface movement of materials. The principal causes are aquifer-system compaction, drainage of organic soils, and exploitation of groundwater. Because there are no withdrawals of groundwater or large-scale extractions of gas, oil, or geothermal energy are occurring in the area, there is little to no potential for ground subsidence at the Project Site.

*(g) Expansive Soils*

Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on expansive soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result. Based on the field exploration conducted at the Project Site, on-site soils were found to have "Very Low" expansion potential.

### (4) Paleontological Resources

On February 21, 2017, the Natural History Museum of Los Angeles County conducted a thorough search of its paleontology collection records for the locality and specimen data for the Project Site and Project area. The records search results are included in Appendix L.2 to this Draft EIR and are summarized below. The Natural History Museum's search concluded that no vertebrate fossil localities lie directly within the Project Site boundaries. Off-site localities were also identified, as described below.

Surface deposits in the entire Project Site consist of younger Quaternary Alluvium, derived as overbank deposits from the Los Angeles River that currently flows in a concrete channel adjacent to the south of the Project Site. These deposits typically do not contain significant vertebrate fossils in the very uppermost layers, but they are underlain in this vicinity by older Quaternary deposits that do contain significant vertebrate fossils. The closest vertebrate fossil locality from older Quaternary deposits beneath the younger

[10] *State of California, U.S. Geological Survey, Seismic Hazards Zones Map, Los Angeles Quadrangle, March 25, 1999, website: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_la.pdf, accessed January 2017.*

[11] *City of Los Angeles, Department of City Planning, General Plan Safety Element, Exhibit C: Landslide Inventory and Hillside Areas in the City of Los Angeles, 1996.*

Quaternary Alluvium is LACM 1023, located approximately 3.6 miles south-southeast of the Project Site. Excavations for a storm drain at that site recovered fossil specimens of turkey *(Meleagris californicus)*, sabre-toothed cat *(Smilodon fatalis)*, horse *(Equus)*, and deer *(Odocoileus)*, at an unstated depth. A specimen of the turkey *(Meleagris)* was recovered from this locality.[12] Just to the south of locality LACM 1023, is another locality, LACM 2032. This site, located approximately 3.8 miles from the Project Site is also located in older Quaternary deposits beneath the younger Quaternary Alluvium and produced fossil specimens of pond turtle *(Clemmys mamorata)*,[13] ground sloth *(Paramylodon harlani)*, mastodon *(Mammut americanum)*, mammoth *(Mammuthus imperator)*, horse *(Equus)*, and camel *(Camelops)* at a depth of 20 to 35 feet below the surface.

# 3. Project Impacts

## a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the project would have a significant impact related to geology and soils if it would result in any of the following impacts to future residents or uses on the Project Site:

***Threshold (a): Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

***i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions. Refer to Division of Mines and Geology Special Publication 42.[14]***

***ii) Strong seismic ground-shaking?***

***iii) Seismic-related ground failure, including liquefaction?***

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[12] *D.W. Steadman, "A Review of the Osteology and Paleontology of Turkeys [Aves: Meleagridinae]. Contributions in Science, Natural History Museum of Los Angeles County, 330:131-207," 1980.*

[13] *B.H. Brattstrom and A. Sturn, "A new species of fossil turtle from the Pliocene of Oregon, with notes on other fossil Clemmys from western North America. Bulletin of the Southern California Academy of Sciences, 58(2):65-71," 1959.*

[14] *The California Division of Mines and Geology was renamed by the California Legislature as the California Geological Survey in August 2006.*

***iv) Landslides?***

***Threshold (b): Would the Project result in substantial soil erosion or the loss of topsoil?***

***Threshold (c): Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?***

***Threshold (d): Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

***Threshold (e): Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?***

***Threshold (f): Would the Project directly or indirectly destroy paleontological resource or site or unique geologic feature?***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the L.A. CEQA Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions. The City's Threshold Guide criteria for landform alteration have no equivalent Appendix G threshold and will be analyzed following the evaluation of the applicable Appendix G "Threshold f." The Thresholds Guide identifies the following criteria to evaluate geology and paleontological resources:

*Geologic Hazards*

- Cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

*Sedimentation and Erosion*

- Constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or
- Accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

*Landform Alteration*

- Cause one or more distinct and prominent geologic or topographic features to be destroyed, permanently covered, or materially and adversely modified as a result of the project. Such features may include, but are not limited to, hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, and wetlands.

*Paleontological Resources*

The determination of significance for paleontological resources shall be made on a case-by-case basis, considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and

- Whether the paleontological resource is of regional or statewide significance.

Based on these factors, the Project would have a significant impact on paleontological resources, if the Project would result in the permanent loss of or loss of access to a paleontological resource of regional of statewide significance.

## b) Methodology

### (1) Geology and Soils

To evaluate potential impacts relative to geology and soils, a geotechnical investigation was conducted for the proposed Project. The Preliminary Geotechnical Investigation included a review of previous geotechnical reports available from the City of Los Angeles Department of Building and Safety for the Project Site, a field exploration (i.e., borings and CPT soundings), and an analysis of the data resulting from the field exploration at the Project Site. The Preliminary Geotechnical Investigation provides geotechnical recommendations to provide the Applicant with sufficient information to develop the Project Site in accordance with the 2016 California Building Code and 2014 Los Angeles Building Code. In addition, relevant literature and materials were reviewed as part of the Preliminary Geotechnical Investigation. The Preliminary Geotechnical Investigation for the Project and the City of Los Angeles Department of Building and Safety's Soils Report Approval Letter are provided in Appendix D to this Draft EIR. It should be noted that the LADBS's approval of the Preliminary Geotechnical Investigation provides requirements and recommendations for the proposed Project. In order to ensure that all recommendations have been incorporated, a final design-level geotechnical report would be prepared and submitted for review and approval by the City of Los Angeles Department of Building and Safety (LADBS) prior to issuance of building permits to construct the Project.

### (2) Paleontological Resources

To address potential impacts associated with paleontological resources, the Natural History Museum of Los Angeles County was consulted to perform a paleontology collection records search for the locality of the Project Site. In addition, an evaluation of existing conditions, the geology of the Project Site (including historical records of past earthwork and grading activities), and the anticipated depths of grading were evaluated to determine the potential for uncovering paleontological resources.

## c) Project Design Features

No specific project design features are proposed with regard to geology and soils.

## d) Analysis of Project Impacts

As discussed in Section II, Project Description, the proposed Project would include the demolition of the existing building (approximately 117,000 square feet of total building area) and site clearance of the paved surface parking lot (3,000 cubic yards of asphalt to be exported from the Project Site) and would include the construction of a mixed-use development with five buildings. The proposed Project's total gross building floor area would be approximately 487,872 square feet, including 419 residential dwelling units (423,872 square feet), 64,000 square feet of commercial uses, and an approximate 240,000-square-foot parking garage.

Prior to the initiation of any grading or earthwork activities, the structure and surface parking existing on the Project Site would be demolished to allow for new development. After the completion of demolition/site clearance, the excavation phase for the proposed Project would occur for approximately two months and would involve shallow excavation of the Project Site to ensure the proper base and slope for the structures and building foundations. The proposed development would all be above grade and does not propose any subterranean levels. The earthwork anticipated at the Project Site would consist of clearing and grubbing, minimal excavation, and placement and compaction of fill. It is estimated that the proposed earthwork and excavation activities would generate approximately 10,000 cubic yards of soil material, which would be exported to off-site fill sites or inert landfills and approximately 10,000 cy of soil import to balance the site. Temporary shoring would be required for supporting the vertical sides of the basement and perimeter footing excavations.

***Threshold (a): Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

***i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.***

***ii) Strong seismic ground-shaking?***

***iii) Seismic-related ground failure, including liquefaction?***

***iv) Landslides?***

## (1) Impact Analysis

### *(a) Surface Rupture*

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no other known active surface fault traces cross the Project Site. The City of Los Angeles ZIMAS system shows that the closest fault to the Project Site is the Hollywood Fault located approximately 0.5 mile from the Project Site.[15] As such, the potential for surface rupture at the Project Site is currently low. ***The construction and operation of the proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture. Therefore, impacts related to surface rupture from a known earthquake fault would be less than significant.***

### *(b) Ground Shaking*

As with all properties in the seismically active Southern California region, the primary seismic hazard for the Project Site is the potential for strong ground shaking. The Project Site is susceptible to ground shaking as a result of potential movement along faults in the region. The proposed Project would be designed and constructed in conformance with the most recently adopted 2016 CBSC design parameters, which are specifically tailored to minimize the potential to expose people or structures to substantial risk of loss or injury due to ground shaking. ***As such, conformance with the CBSC and the City of Los***

[15] *City of Los Angeles Department of City Planning, Zoning Information and Map Access System, website: http://zimas.lacity.org/, accessed September 2016.*

***Angeles Building Code would ensure that development of the proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving ground shaking. Therefore, impacts associated with ground shaking would be less than significant.***

*(c) Seismic-Related Ground Failure and Liquefaction*

Due to the dense to very dense nature of on-soils and the depth of groundwater levels, the Project Site is not considered susceptible to liquefaction, lateral spreading, and seismic related ground failure. ***As such, development of the proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure or liquefaction. Therefore, impacts related to ground failure and liquefaction would be less than significant.***

*(d) Landslides*

Based on the City of Los Angeles Safety Element "Landslide Inventory & Hillside Areas" map, the Project Site is not located within a hillside area or within a landslide area.[16] Further the Project Site is located within a highly urbanized area within the City of Los Angeles. The topography of the Project Site is relative flat. Accordingly, the Project Site is not considered susceptible to landslides. ***As such, development of the proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslide. Therefore, impacts related to landslides would be less than significant.***

***In conclusion, impacts related to surface rupture, ground shaking, liquefaction, and landslides would be less than significant without mitigation. As such, no mitigation measures are required.***

## (2) Mitigation Measures

Project impacts with respect to surface rupture, ground shaking, liquefaction, and landslides would be less than significant. Therefore, no mitigation measures would be required.

[16] *City of Los Angeles, Department of City Planning, General Plan Safety Element Exhibit C, Landslide Inventory & Hillside Areas in the City of Los Angeles, 1996. website: http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed January 2017.*

### (3) Level of Significance After Mitigation

Project impacts with respect to surface rupture, ground shaking, liquefaction, and landslides would be less than significant without mitigation.

***Threshold (b): Would the Project result in substantial soil erosion or the loss of topsoil?***

### (1) Impact Analysis

Although development of the proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by LADBS through grading and building permit regulations.

Prior to issuance of a grading permit, the Applicant would be required to obtain coverage under the State Water Resources Control Board National Pollution Discharge Elimination System (NPDES) Construction General Permit. The Applicant would be required to provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP would identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

All grading activities require grading permits from LADBS, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading, excavation, and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. Furthermore, the grading plan will conform with the City's Landform Grading Manual guidelines, subject to approval by the Advisory Agency and LADBS's Grading Division. Appropriate erosion control and drainage devices shall be provided to the satisfaction of LADBS. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned. ***Compliance with the aforementioned regulatory measures would ensure a less-than-significant impact would occur with respect to erosion or loss of topsoil during the construction phase.***

### (2) Mitigation Measures

Project impacts with respect to soil erosion or loss of topsoil would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Project impacts with respect to soil erosion or loss of topsoil would be less than significant without mitigation.

***Threshold (c): Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?***

### (1) Impact Analysis

As discussed above, the Project Site is not within a liquefaction zone and is not located in an area susceptible to liquefaction or collapse. The Project Site is not considered susceptible to subsidence. The Project Site is also not located within a hillside area or within a landslide area. ***As such, the proposed Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project, and potentially result in subsidence, on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to unstable soils would be less than significant.***

### (2) Mitigation Measures

Project impacts with respect to unstable soils would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Project impacts with respect to unstable soils would be less than significant without mitigation.

***Threshold (d): Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

### (1) Impact Analysis

As previously described, on-site soils were found to have “Very Low” expansion potential based on the field exploration conducted at the Project Site. ***As such, the proposed Project would not be located on expansive soils to create substantial risks to life***

***or property. Therefore, impacts related to expansive soils would be less than significant.***

### (2) Mitigation Measures

Project impacts with respect to expansive soils would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Project impacts with respect to expansive soils would be less than significant without mitigation.

***Threshold (e): Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?***

As discussed in the Initial Study on page B-11 (Appendix A), the Project Site is located in an urban area served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems currently exist on the Project Site or are proposed by the Project. Thus, the Project would have no impact with respect to Threshold (e), and no further analysis is required.

***Threshold (f): Would the Project directly or indirectly destroy a paleontological resource or site or unique geologic feature?***

### (1) Project Impacts

The Project Site has been previously developed. As discussed above, the Project Site is underlain by previously placed and approved primary structural fill within the approximate building footprint ranging from approximately 12 to 23 feet below existing grade. Excavations to develop the proposed Project would extend between approximately 2 feet below grade to 15 feet below grade.

As discussed in the Environmental Setting section above, the Natural History Museum's record search determined that there are no known paleontological resources on the Project Site. The Natural History Museum's record search letter further states that surface grading or very shallow excavations in the uppermost few feet of the younger Quaternary Alluvium in the Project Site area are unlikely to uncover significant fossil vertebrate remains. Because the proposed Project would involve excavations to a maximum depth of only 15 feet below grade level affecting artificial fill and Quaternary alluvial fan deposits, there would be no potential to impact paleontological resources. ***As such, there would be no impact upon paleontological resources.***

### (2) Mitigation Measures

As noted above there would be no Project impacts related to paleontological resources. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

The proposed Project would not impact paleontological resources without mitigation.

## e) Cumulative Impacts

### (1) Impact Analysis

#### *(a) Geology and Soils*

Geotechnical impacts related to future development in the City of Los Angeles would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. Such conditions are site-specific and would not be common to (or shared with, in an additive sense) the impacts on other sites that are not physically connected. Cumulative development in the area would increase the overall population for exposure to seismic hazards by increasing the number of people potentially exposed. ***However, with adherence to applicable City and state regulations, buildings codes, and sound engineering practices, Project impacts with regard to the exacerbation of existing geological and soils conditions would not be cumulatively considerable, and cumulative impacts related to geology and soils would be less than significant.***

#### *(b) Paleontological Resources*

Finds of paleontological resources tend to be site-specific. With regards to paleontological resources, the nearest known paleontological site localities are over 3.6 miles from the Project Site. The proposed Project would involve shallow site grading and excavation (to a maximum of 15 feet below grade) and would not extend into older sedimentary deposits. For this reason, the proposed Project would have no impact upon paleontological resources. Accordingly, the proposed Project would not have the potential to contribute to cumulative impacts to paleontological resources. ***Cumulative impacts associated with paleontological resources would therefore be less than significant.***

### (2) Mitigation Measures

Cumulative Impacts related to geology and soils and paleontological resources would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance after Mitigation

Cumulative impacts related to geology and soils and paleontological resources would be less than significant without mitigation.

# Environmental Impact Analysis

# D. Greenhouse Gas Emissions

## 1. Introduction

This section provides a discussion of global climate change, existing regulations pertaining to global climate change, an inventory of the approximate greenhouse gas (GHG) emissions that would result from the proposed Project, and an analysis of the significance of the impact of these GHGs. Calculation worksheets, assumptions, and model outputs used in the analysis are included in Appendix E of this Draft EIR.

### a) General Terms and Scientific Literature

Earth's natural warming process is known as the "greenhouse effect." This greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiated heat from escaping, thus warming Earth's atmosphere. GHGs keep the average surface temperature of the Earth to approximately 60 degrees Fahrenheit (°F). However, excessive concentrations of GHGs in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.[1]

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (during motorized transport, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.), deforestation, agricultural activity, and the decomposition of solid waste.[2]

Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.[3] While the increase in temperature is known as "global warming," the resulting change in weather

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[1] *Intergovernmental Panel on Climate Change, 2014: Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)].*

[2] *Pew Center on Global Climate Change and the Pew Center on the States, Climate Change 101: Understanding and Responding to Global Climate Change, October 2006.*

[3] *Ibid.*

patterns is known as "global climate change." Global climate change is evidenced in changes to global temperature rise, warming oceans, shrinking ice sheets, glacial retreat, decreased snow cover, sea level rise, declining Arctic sea ice, extreme weather events, and ocean acidification.[4]

## b) GHG Components

Common GHGs include carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride ($SF_6$).[5] A general description of each GHG discussed in this section is provided in Table IV.D-1, Description of Identified Greenhouse Gases, below. $CO_2$ is the most abundant GHG present within the atmosphere. Other GHGs present within the atmosphere are less abundant but have higher global warming potential (GWP) than $CO_2$. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of $CO_2$, denoted as $CO_2e$. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking food are the primary sources of GHG emissions.

## c) Global Warming Potential

GWP is one type of simplified index based upon radiative properties that is used to estimate the potential future impacts of emissions of different gases upon the climate system in a relative sense. GWP is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of $CO_2$, as well as the decay of each gas over a specified time period (the amount removed from the atmosphere over a given number of years) relative to that of $CO_2$. For reference, a summary of the atmospheric lifetime and GWP of selected gases is presented at Table IV.D-2, Atmospheric Lifetimes and Global Warming Potentials. As indicated, GWP ranges from 1 ($CO_2$) to 22,800 ($SF_6$).

[4] *Intergovernmental Panel on Climate Change, 2014: Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)].*

[5] *As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.*

**Table IV.D-1**
**Description of Identified Greenhouse Gases**

| Greenhouse Gas | General Description |
|---|---|
| **$CO_2$** | $CO_2$ is an odorless, colorless GHG, which has both natural and anthropogenic sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing; anthropogenic sources of $CO_2$ are burning coal, oil, natural gas, and wood. |
| **$CH_4$** | $CH_4$ is a flammable gas and is the main component of natural gas. When one molecule of $CH_4$ is burned in the presence of oxygen, one molecule of $CO_2$ and two molecules of water are released. A natural source of $CH_4$ is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain $CH_4$, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle. |
| **$N_2O$** | $N_2O$ is a colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. $N_2O$ is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant. |
| **HFCs** | HFCs are synthetic man-made chemicals that are used as a substitute for chlorofluorocarbons (CFCs) for automobile air conditioners and refrigerants. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. |
| **PFCs** | PFCs have stable molecular structures and do not break down though the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above the Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semiconductor manufacture. |
| **$SF_6$** | $SF_6$ is an inorganic, odorless, colorless, non-toxic, and nonflammable gas. $SF_6$ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection. |

*Source: Association of Environment Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007.*

**Table IV.D-2**
**Atmospheric Lifetimes and Global Warming Potentials**

| Gas | Atmospheric Lifetime (years) | Global Warming Potential (100 year time horizon) |
|---|---|---|
| $CO_2$ | 50 – 200 | 1 |
| $CH_4$ | 12 (+/-3) | 25 |
| $N_2O$ | 120 | 298 |
| HFC-23 | 264 | 14,800 |
| HFC-134a | 14.6 | 1,430 |
| HFC-152a | 1.5 | 124 |
| PFC-14: Tetrafluoromethane ($CF_4$) | 50,000 | 7,390 |
| PFC-116: Hexafluoroethane ($C_2F_6$) | 10,000 | 12,200 |
| Sulfur Hexafluorides ($SF_6$) | 3,200 | 22,800 |

*Source: IPCC, 2007*

## d) Projected Impacts of Climate Change in California

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the Intergovernmental Panel on Climate Change's (IPCC) *Fifth Assessment Report, Summary for Policy Makers* states that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forc[es [*sic*] together."[6] A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.[7]

According to the California Air Resources Board (CARB), the potential impacts in California due to global climate change may include loss in snow pack, sea level rise,

[6] *Intergovernmental Panel on Climate Change, Fifth Assessment Report, Summary for Policy Makers, page 5, 2013, http://ipcc.ch/report/ar5/syr/, accessed August 2018.*

[7] *Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America. 2010;107:12107-12109.*

more extreme heat days per year, more high ozone days, more large forest fires, more drought years, increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems, and increased pest infestation.[8] Below is a summary of some of the potential effects that could be experienced in California as a result of global warming and climate change.

### (1) Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect and, therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state.[9] However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus reducing the pollution associated with wildfires.

In 2009, the California Natural Resources Agency (CNRA) published the *California Climate Adaptation Strategy* as a response to the Governor's Executive Order S-13-2008.[10] The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the *California Climate Adaptation Strategy*, the California Energy Commission (CEC) was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers.[11] The website, known as Cal-Adapt, became operational in 2011.[12] The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea-level rise, snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the portion of the City in which the Project Site is located could result in a modeled projected annual mean temperature of approximately 81.8°F by 2070–2099, compared to the historical annual mean of 76.2°F during the baseline 1961–1990 period.

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8 *California Environmental Protection Agency, Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2006.*

9 *California Environmental Protection Agency, Preparing California for Extreme Heat: Guidance and Recommendations, October 2013.*

10 *California Natural Resources Agency, Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.*

11 *California Natural Resources Agency, Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.*

12 *The Cal-Adapt website address is: http://cal-adapt.org, accessed August 2018*

### (2) Water Supply

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change."[13] For example, some studies identify little change in total annual precipitation in projections for California, while others show significantly more precipitation.[14] Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.[15]

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes are uncertain."[16] It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future."[17] Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.[18] In its *Fifth Assessment Report*, the IPCC states "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions."[19]

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13 *Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003, page 5.*

14 *Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.*

15 *California Natural Resources Agency, Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy, 2014.*

16 *California Department of Water Resources Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006, page 2-54.*

17 *Ibid.*

18 *California Department of Water Resources Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006, page 2-75.*

19 *Intergovernmental Panel on Climate Change, Fifth Assessment Report, Summary for Policy Makers, 2013, page 20.*

### (3) Hydrology and Sea Level Rise

As discussed above, climate change could potentially affect the amount of snowfall, rainfall, and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

### (4) Agriculture

California has a $30 billion agricultural industry that produces half the country's fruit and vegetables. Higher $CO_2$ levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.[20]

### (5) Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2 to 11.5°F (1.1 to 6.4°C) by 2100, with significant regional variation.[21] Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 2 feet along most of the United States coastline. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes, such as carbon cycling and storage.[22]

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[20] *California Climate Change Center, Our Changing Climate: Assessing the Risks to California, 2006.*

[21] *National Research Council, Advancing the Science of Climate Change, 2010.*

[22] *Parmesan, C., and H. Galbraith, Observed Impacts of Global Climate Change in the U.S., Prepared for the Pew Center on Global Climate Change, November 2004.*

# 2. Environmental Setting

## a) Regulatory Framework

In response to growing scientific and political concern about global climate change, federal, state, and local governmental entities have adopted a series of laws to reduce emissions of GHGs to the atmosphere. The following includes a discussion of the applicable regulations associated with GHG emissions in the context of land use planning and development.

### (1) Federal

#### *(a) Federal Clean Air Act*

In the past, the U.S. Environmental Protection Agency (USEPA) has not regulated GHGs because it asserted that the Clean Air Act (CAA) did not authorize it to issue mandatory regulations to address global climate change. (See Section IV.B, Air Quality for a detailed discussion of the CAA.) However, in 2007 the U.S. Supreme Court held that the USEPA must consider regulation of motor-vehicle GHG emissions.[23] The Court ruled that GHGs fit within the CAA's definition of a pollutant and that the USEPA did not have a valid rationale for not regulating GHGs. In December 2009, the USEPA issued an endangerment finding for GHGs under the CAA. This is the first step in regulating GHGs under the provisions of the CAA.

#### *(b) Energy Independence and Security Act*

In December 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. The purpose of the EISA is "to move the United States toward greater energy independence and security, to increase the production of clean renewable fuels, to protect consumers, to increase the efficiency of products, buildings, and vehicles, to promote research on and deploy greenhouse gas capture and storage options, and to improve the energy performance of the Federal Government, and other purposes."[24] The EISA provided regulations on fuel economy standards for passenger cars and medium-duty and heavy-duty commercial vehicles, renewable fuel standards, appliances and lighting energy efficiency, and building energy efficiency, among others.

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[23] *Massachusetts v. Environmental Protection Agency et al. (127 S. Ct. 1438 (2007))*

[24] *Energy Independence and Security Act of 2007 (42 U.S.C ch. 152 § 17001 et. seq.), December 19, 2007.*

*(c) Corporate Average Fuel Economy (CAFE) Standards*

On September 15, 2009, the National Highway Traffic Safety Administration and USEPA announced a proposed joint rule that would explicitly tie fuel economy to GHG emissions reductions requirements. The current Corporate Average Fuel Economy (CAFE) Standards cover automobiles for model years 2017 through 2021, and require passenger cars and light trucks to meet a combined, per–mile, $CO_2$ emissions level. The U.S. Department of Transportation (USDOT) and USEPA are proposing the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which would amend existing CAFE and tailpipe $CO_2$ emissions standards for passenger cars and light trucks and establish new standards covering model years 2021 through 2026.

## (2) State

*(a) California Global Warming Solutions Act (AB 32), Senate Bill 32, and Assembly Bill 197*

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB was directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

In 2016, the Legislature passed, and the Governor signed, Senate Bill 32 (SB 32)[25] and Assembly Bill 197 (AB 197).[26] SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's April 2015 Executive Order B-30-15. SB 32 builds on AB 32 and keeps California on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an IPCC analysis of the emissions trajectory that would stabilize atmospheric GHG concentrations at 450 parts per million $CO_2e$ and reduce the likelihood of catastrophic impacts from climate change. The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions.

[25] *(Pavley, Chapter 249, Statutes of 2016)*
[26] *(Garcia, Chapter 250, Statutes of 2016)*

*(i) 2008 Climate Change Scoping Plan*

The 2008 Climate Change Scoping Plan is defined by AB 32 as "achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020." Climate Change Scoping Plan measures include direct emission reductions, alternative compliance mechanisms, market-based compliance mechanisms, and potential monetary and non-monetary incentives for sources for categories. By January 1, 2014 and every five years thereafter, CARB will update its Climate Change Scoping Plan. CARB approved the Climate Change Scoping Plan in 2008 (hereinafter referred to as the original Scoping Plan) and approved updates to the original Scoping Plan in 2014 and 2017 (hereinafter referred to as the 2014 Scoping Plan and the 2017 Scoping Plan, respectively).

The original Scoping Plan called for a "coordinated set of solutions" to address all major categories of GHG emissions. Transportation emissions were addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to use energy more efficiently. Utility energy providers were required to include more renewable energy sources through implementation of the Renewables Portfolio Standard. Additionally, the original Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that substantial savings of electricity and natural gas would be accomplished through "improving energy efficiency by 25 percent."

*(ii) 2014 Scoping Plan*

In May 2014, CARB approved the First Update to the Climate Change Scoping Plan (2014 Scoping Plan), where it revised the previously adopted 1990 GHG emissions level from 427 $MMTCO_2e$ to 431 $MMTCO_2e$ based on the scientifically updated GWP values in the IPCC's Fourth Assessment Report.[27] Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the scope of the reductions California has to make to return to the 1990 emissions level by 2020 as required by AB 32. CARB originally defined the "business-as-usual" or BAU scenario as emissions in the absence of any GHG emission reduction measures discussed in the original Scoping Plan. The total emissions expected in the 2020 BAU scenario were also updated from the previously adopted estimate of 596 $MMTCO_2e$ to 509 $MMTCO_2e$. The updated 2020 BAU scenario includes reductions anticipated from Pavley I and the Renewable Electricity

[27] *The IPCC is the leading international body for the scientific assessment of climate change established in 1988 under the auspices of the United Nations.*

Standard, which are now adopted into law. The stated purpose of the 2014 Scoping Plan is to highlight California's success to date in reducing its GHG emissions and lay the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050.[28] The 2014 Scoping Plan found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the State realizes the expected benefits of existing policy goals.[29]

In conjunction with the 2014 Scoping Plan, CARB identified "six key focus areas comprising major components of the State's economy to evaluate and describe the larger transformative actions that will be needed to meet the State's more expansive emission reduction needs by 2050."[30] Those six areas are (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. The 2014 Scoping Plan identified key recommended actions for each sector that would facilitate achievement of the 2050 reduction target. Based on CARB's research efforts, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050."[31] Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies.

*(iii) 2017 Scoping Plan Update*

In December 2017, CARB adopted "California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target" (2017 Scoping Plan) that describes the actions the State will take to achieve the SB 32 climate goal of reducing GHG emissions at least 40 percent below 1990 levels by 2030. The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California's climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. It outlines an approach that cuts across economic sectors to combine GHG reductions with reductions of smog-causing pollutants, while also safeguarding public health and economic goals. The 2017 Scoping Plan reflects the direction from the Legislature on the Cap-and-Trade Program, as

[28] *CARB, First Update, p. 4, May 2014.*
[29] *CARB, First Update, p. 34, May 2014.*
[30] *CARB, First Update, p. 6, May 2014.*
[31] *CARB, First Update, p. 32, May 2014.*

described in AB 398, the need to extend key existing emissions reductions programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level.

The 2017 Scoping Plan buildings on the state's successes to date, proposing to strengthen the major programs that have been a hallmark of success, while further integrating efforts to reduce both GHG's and air pollution. California's climate efforts will:

- Lower GHG emissions on a trajectory to avoid the worst impacts of climate change;
- Support a clean energy economy which provides more opportunities for all Californians;
- Provide a more equitable future with good jobs and less pollution for all communities;
- Improve the health of all Californians by reducing air and water pollution and making it easier to bike and walk; and
- Make California an even better place to live, work, and play by improving our natural and working lands.

The California Legislature has shaped the State's climate change program, setting out clear policy objectives over the next decade:

- 40 percent reduction in GHG emissions by 2030;
- 50 percent renewable electricity;
- Double energy efficiency savings;
- Support for clean cars;
- Integrate land use, transit, and affordable housing to curb auto trips;
- Prioritize direct reductions;
- Identify air pollution, health, and social benefits of climate policies;
- Slash "super pollutants";
- Protect and manage natural and working lands;
- Invest in disadvantaged communities; and
- Strong support for Cap-and-Trade.

The actions identified in the 2017 Scoping Plan can reduce overall GHG emissions in California and deliver strong policy signals that will continue to drive investment and certainty in a low carbon economy. The 2017 Scoping Plan builds upon the successful framework established by the original Scoping Plan and the 2014 Scoping Plan, while also identifying new, technologically feasibility and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards

innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The 2017 Scoping Plan is developed to be consistent with requirements set forth in AB 32, SB 32, and AB 197 and includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constrains and reduces emissions at covered sources. Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 $MMTCO_2e$. California has made progress toward achieving the 2020 statewide GHG target while also reducing criteria pollutants and toxic air contaminants and supporting economic growth.

While the 2017 Scoping Plan does not impose any specific mandates or policies that specifically apply to individual development projects such as the proposed Project, the Scoping Plan encourages local municipalities to update building codes and establish sustainable development practices for accommodating future growth. Key policies that involve the residential and commercial building sectors that are indirectly applicable to the proposed Project include the implementation of SB 275 (promoting infill development and high density housing in high quality transit areas), implementing green building practices (i.e., Cal Green Code), energy efficiency and water conservation policies, and waste diversion efforts.

*(b) Executive Order B-30-15*

On April 29, 2015, California Governor Jerry Brown issued Executive Order B-30-15. Therein, Governor Brown:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030;[32]
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets; and
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

*(c) California Renewables Portfolio Standard*

The California Renewables Portfolio Standard (RPS) program (2002, Senate Bill [SB] 1078) required that 20 percent of the available energy supplies in California are from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20 percent mandate

[32] *In response to EO-B-30-15, this target was adopted by the California Senate under SB 32 on September 8, 2015.*

to 2010. These mandates apply directly to investor-owned utilities (IOUs). On April 12, 2011, California Governor Jerry Brown signed into law Senate Bill 2X, which modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016. In compliance with Senate Bill (SB) 1222,[33] the California Public Utilities Commission (CPUC) reports to the Legislature each year on the progress of the RPS program. Based on the IOU Annual RPS Compliance Filings in August 2107, the three large IOUs surpassed this requirement.[34]

*(d) California Senate Bill 350*

The Clean Energy and Pollution Reduction Act of 2015, Senate Bill (SB) 350 (Chapter 547, Statutes of 2015) was approved by Governor Brown on October 7, 2015. SB 350 will (1) increase the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by December 31, 2030; (2) require the State Energy Resources Conservation and Development Commission to establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030; (3) provide for the evolution of the Independent System Operator (ISO) into a regional organization; and (4) require the state to reimburse local agencies and school districts for certain costs mandated by the state through procedures established by statutory provisions. Among other objectives, the Legislature intends to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. In other words, SB 350 essentially requires the energy efficiency of existing buildings to be doubled by 2030.

*(e) California Senate Bill 1368*

California SB 1368, a companion bill to AB 32, requires the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers,

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[33] *(Hertzberg, 2016; as codified in Public Utilities Code Section 913.41)*

[34] *California Public Utilities Commission, 2017 Annual Report: Renewable Portfolio Standard, November 2017 (at Table 1). The three large IPOs consist of Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas and Electric (SDG&E).*

thereby assisting CARB to meet its mandate under AB 32. On January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard, which is a facility-based emissions standard requiring that all new long-term commitments for baseload generation to serve California consumers be with power plants that have GHG emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of $CO_2$ per megawatt-hour. Further, on May 23, 2007, the CEC adopted regulations that establish and implement an identical Emissions Performance Standard of 1,100 pounds of $CO_2$ per megawatt-hour (see CEC Order No. 07-523-7). Sustainable Communities and Climate Protection Act (SB 375).

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill 375 (SB 375) became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the state. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating "Sustainable Community Strategies" (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. For the SCAG region, the targets are set at eight percent below 2005 per capita emissions levels by 2020 and 13 percent below 2005 per capita emissions levels by 2035.

*(f) SB 97 & CEQA Guidelines*

In August 2007, the Legislature adopted Senate Bill 97 (SB 97), requiring the Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the California Natural Resources Agency. OPR submitted its proposed guidelines to the Secretary for Natural Resources on April 13, 2009, and the CEQA Guidelines amendments were adopted on December 30, 2009 and became effective on March 18, 2010.

The CEQA Guidelines amendments do not specify a threshold of significance for GHG emissions or prescribe assessment methodologies or specific mitigation measures. Instead, the amendments encourage lead agencies to consider many factors in performing a CEQA analysis but rely on the lead agencies in making their own significance determinations based upon substantial evidence. The CEQA Guidelines amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

The CEQA Guidelines amendments require a lead agency to make a good-faith effort based on the extent possible on scientific and factual data to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. The CEQA Guidelines amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify greenhouse gas emissions resulting from a project and which model or methodology to use and/or (2) rely on a qualitative analysis or performance-based standards. Further, the CEQA Guidelines amendments identify three factors that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.[35]

The administrative record of the promulgation of the CEQA Guidelines amendments also clarifies "that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis."[36]

The California Natural Resources Agency is required to periodically update the guidelines to incorporate new information or criteria established by CARB pursuant to AB 32.

*(g) Title 24 Energy Efficiency Standards*

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The Standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2016 Standards went into effect on January 1, 2017 and improve upon the 2013 Standards for new construction of, and additions and alterations to, residential

[35] *14 Cal. Code Regs. § 15064.4(b).*

[36] *Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources (April 13, 2009).*

and nonresidential buildings. The CEC adopted the 2016 changes to the Building Energy Efficiency Standards to respond to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs.

*(h) California Green Building Standards*

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. The first edition of the CALGreen Code was released in 2008 and contained only voluntary standards. The 2016 CALGreen Code was updated in 2016 and became effective on January 1, 2017 and applies to non-residential and residential developments. The CALGreen Code contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency.

*(i) Cap-and-Trade Program*

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies for California to meet its GHG reduction targets for 2020 and 2030, and ultimately achieve an 80 percent reduction from 1990 levels by 2050. Under the Cap-and-Trade Program, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHGs within the overall limit.

CARB adopted the California Cap-and-Trade Program pursuant to its authority under AB 32 and the State Legislature extended the Program through 2030 with the adoption of AB 398. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources, such as refineries and power plants, (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's and SB 32's emission-reduction mandates of reducing GHG emissions to 1990 levels by 2020 and 40 percent below 1990 levels by 2030. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

Covered entities that emit more than 25,000 metric tons $CO_2e$ per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons $CO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR). As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions.[37]

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.

The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with VMT are covered by the Cap-and-Trade Program.

*(i) California's Climate Adaptation Strategy*

As directed by Executive Order S-13-08, California Natural Resources Agency published the *2009 California Climate Adaptation Strategy* (2009 CAS), which summarizes the best-known sciences to assess the vulnerability of the state to climate change impact, and outlines possible solutions that can be implemented within and across state agencies to promote resiliency to the effects of climate change. This strategy document was first updated in 2014, with the publication of *Safeguarding California: Reducing Climate Risk - An update to the 2009 California Climate Adaptation Strategy*. In September 2015, the California Legislature passed AB 1482, which requires the Natural Resources Agency to update the Climate Adaptation Strategy every 3 years. The latest update to the Climate Adaptation Strategy was the Safeguarding California Plan: 2018 Update – California's Climate Adaptation Strategy (January 2018).[38] The 2018 Update to the Safeguarding California Plan is a roadmap showing how California's state government is taking action

[37] *CARB News, released November 3, 2016, website: https://ww2.arb.ca.gov/news/air-resources-board-announces-100-percent-compliance-cap-and-trade-regulation, accessed August 2018.*

[38] Natural Resources Agency, *Safeguarding California Plan: 2018 Update – California's Climate Adaptation Strategy* (January 2018).

to respond to climate change. It clearly lays out the next steps to achieve the State's goals and how those objectives will be achieved.

The 2018 Update to the Safeguarding California Plan presents the following seven overarching principles that represent foundational objectives for California's approach to climate change adaptation:

- Consider climate change in all functions of government.
- Partner with California's most vulnerable populations to increase equity and resilience through investments, planning, research, and education.
- Support continued climate research and data tools.
- Identify significant and sustainable funding sources to reduce climate risks, harm to people, and disaster spending.
- Prioritize natural infrastructure solutions that build climate preparedness, reduce greenhouse gas emissions, and produce other multiple benefits.
- Promote collaborative adaptation processes with federal, local, tribal, and regional government partners.
- Increase investment in climate change vulnerability assessments of critical built infrastructure systems.

The 2018 Update to the Safeguarding California Plan summarizes climate change impacts and recommends adaptation strategies across eleven sectors: Emergency Management, Energy, Land Use and Community Development, Public Health, Transportation, Agriculture, Biodiversity and Habitat, Forests, Oceans and Coastal Resources, and Water Resources. The 2018 Update adds a chapter on Parks, Recreation, and California Culture, which addresses social systems, the built environment, and natural resources.

### (3) Regional

#### *(a) Southern California Association of Governments*

On April 6, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future (2016–2040 RTP/SCS). The 2016-2040 RTP/SCS is an update to the 2012-2035 RTP/SCS that further integrates land use and transportation in certain areas so that the region as a whole can grow smartly and sustainably. Between 2015 and 2040, the region is anticipated to experience increases in population, households, and jobs. The 2016-

2040 RTP/SCS includes land use strategies based on local general plans as well as input from local governments to reduce GHG emissions through decreases in regional per capita VMT. As part of the 2016-2040 RTP/SCS, transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand.

Within the 2016-2040 RTP/SCS, the SCS chapter demonstrates the region's ability to attain and exceed the GHG emission reduction targets set forth by CARB. The SCS chapter outlines the region's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the 2016–2040 RTP/SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint/Sustainability Planning Grant Demonstration Projects and various county transportation improvements. The 2016–2040 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

On June 28, 2016, CARB accepted SCAG's quantification of GHG emission reductions from the 2016–2040 RTP/SCS and the determination that the 2016–2040 RTP/SCS would, if implemented, achieve the region's GHG targets with an 8 percent per capita reduction by 2020 and an 18 percent per capita reduction by 2035.[39]

SCAG's SCS provides specific strategies for successful implementation. These strategies include supporting projects that encourage diverse job opportunities for a variety of skills and education, recreation and culture; and a full-range of shopping, entertainment, and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.

[39] *CARB Executive Order G-16-066, www.arb.ca.gov/cc/sb375/scag_executive_order_g_16_066.pdf*

*(b) SCAQMD*

The South Coast Air Quality Management District (SCAQMD) adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

In 2008, the SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. Within its October 2008 document, the SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). Although SCAQMD formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds, this group has not met since 2010.[40]

## (4) Local

*(a) City of Los Angeles Green Action Plan/Climate LA Plan*

The City's goals and actions aimed at reducing the generation and emission of GHGs from both public and private activities are addressed through the adoption and

[40] *South Coast Air Quality Management District, Greenhouse Gases CEQA Significance Thresholds, website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2, accessed June 2017.*

implementation of the *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (L.A. Green Plan). According to the L.A. Green Plan, Los Angeles is committed to the goal of reducing emissions of $CO_2$ to 35 percent below 1990 levels by 2030. To achieve this, the City is:

- Increasing the generation of renewable energy;
- Improving energy conservation and efficiency; and
- Changing transportation and land use patterns to reduce dependence on automobiles.

From 2003 to 2016, the LADWP increased its renewable energy percentage from 3 percent in 2003 to 20 percent in 2010.[41] LADWP exceeded the second SB2-1X compliance period of 2014 through 2016, which required the sum of 20% renewable portfolio standard (RPS) for 2014, 21% RPS for 2015, and 29% RPS for 2016. The 2017 Final Power IRP identifies strategies to achieve a Renewable Portfolio Standard of 50 percent by 2030 with interim targets of 40 percent by 2024 and 45 percent by 2027.[42]

In 2008, the City released ClimateLA, an implementation program for the action items discussed in the L.A. Green Plan. ClimateLA provides detailed information about each action item discussed in the L.A. Green Plan framework. Some of the adaptive action items recommended include making Los Angeles a worldwide leader in green buildings, decreasing per-capita water use, and implementing a City-wide climate change education program.

*(b) City of Los Angeles Sustainable City pLAn*

On April 8, 2015, Mayor Eric Garcetti released Los Angeles's first ever Sustainable City pLAn (The pLAn). The pLAn sets the course for a cleaner environment and a stronger economy, with commitment to equity as its foundation. The pLAn is made up of short-term (by 2017) and long-term (2025 and 2035) targets. The pLAn sets out an ambitious vision for cutting GHG emissions, reducing the impact of climate change, and building support for national and global initiatives. Los Angeles has moved to the forefront of climate innovation and leadership through bold actions on energy efficiency and electric vehicle as well as renewable energy and greenhouse gas accounting. Los Angeles has already reduced its GHG emissions by 20 percent below 1990 levels as of 2013, nearly halfway to the goal of 45 percent below 1990 levels by 2025. The City has been working to increase the generation of renewable energy, improve energy conservation and

[41] *LADWP, 2017 Power Strategic Long-Term Resources Plan (IRP), December 2017.*
[42] *Ibid.*

efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

*(c) City of Los Angeles Green Building Code*

In order to help implement the L.A. Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council adopted the Los Angeles Green Building Code (L.A. Green Building Code) applicable to new development projects.

In 2010, the City adopted the 2010 CALGreen, with amendments, as Ordinance No. 181,480, thereby codifying provisions of CALGreen as the new L.A. Green Building Code. As amended by Ordinance 184,692 in 2016, the L.A. Green Building Code was amended to incorporate by reference portions of the 2016 Edition of the CALGreen Code. The L.A. Green Building Code, as amended, contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the L.A. Green Building Code requires projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), reduce the overall use of potable water by 20 percent, meet the applicable provisions of the California Energy Code, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC, among other provisions.

*(d) City of Los Angeles General Plan*

The City of Los Angeles does not have a General Plan Element specific to Global Warming and GHG emissions. However, the following five goals from the Air Quality Element of the City of Los Angeles General Plan would also serve to reduce GHG emissions:

- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures, such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

# b) Existing Conditions

## (1) Existing State-Wide Greenhouse Gas Emissions

The California statewide GHG inventory is a critical piece, in addition to data from various AB 32 programs, in demonstrating the state's progress in achieving the statewide GHG targets established by AB 32 (reduce emissions to the 1990 levels by 2020) and SB 32 (reduce emissions to at least 40 percent below the 1990 levels by 2030). The 2018 edition of the GHG inventory includes the emissions of the seven GHGs identified in AB 32 for the years 2000 to 2016 and uses an inventory scope and framework consistent with international and national GHG inventory practices.

In 2016, California's annual statewide GHG emission inventory was estimated at 429.4 $MMTCO_2e$.[43] A table summary of the emissions reported by sector is provided below in Table IV.D-3.

**Table IV.D-3**
**California's 2016 Annual Statewide GHG Emissions by Sector**

| Sector | Emissions by Economic Sector |
|---|---|
| Transportation | 41% |
| Industrial | 23% |
| Electricity Generation (In State) | 10% |
| Electricity Generation (Imports) | 6% |
| Agriculture | 8% |
| Residential | 7% |
| Commercial | 5% |
| Not Specified | <1% |
| **Total Emissions** | **100%**<br>**429.4 $MMTCO_2e$** |
| *Source: CARB, California Greenhouse Gas Emission Inventory - 2018 Edition.* | |

California's GHG emissions have followed a declining trend since 2007. In 2016, emissions from routine emitting activities statewide were 429 $MMTCO_2e$, representing an overall decrease of 13 percent since peak levels in 2004 and 2 $MMTCO_2e$ below the 1990 level and the state's 2020 GHG target. During the 2000 to 2016 period, per capita GHG emissions in California have continued to drop from a peak in 2001 of 14.0 tons per person to 10.8 tons per person in 2016, a 23 percent decrease. Overall trends in the inventory also demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product (GDP)) is declining,

[43] *CARB, 2018 Edition of the GHG Emission Inventory, Released July 11, 2018 website: accessed at http://www.arb.ca.gov/cc/inventory/data/data.htm, accessed August 2018.*

representing a 38 percent decline since the 2001 peak, while the state's GDP has grown 41 percent during this period. In 2016, GDP grew 3 percent while the emissions per GDP declined by 6 percent compared to 2015.

### (2) Existing Project Site Emissions

The CEQA Guidelines specify that the physical environmental conditions at the time the NOP is published "will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." (CEQA Guidelines Section 15125(a)). The Project Site is currently developed with a light manufacturing building and a surface parking lot. GHG emissions are currently generated by the existing uses at the Project Site from stationary sources, such as space and water heating, electricity use, water use, solid waste generation, and from mobile vehicle traffic traveling to and from the Project Site. The average annual GHG emissions generated by the existing uses at the Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table IV.D-4, Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with existing operations of the Project Site. As shown in Table IV.D-4, the existing uses on the Project Site generate approximately 1,831.72 $MTCO_2e$ per year.

**Table IV.D-4**
**Existing Project Site Greenhouse Gas Emissions**

| Emissions Source | $CO_2e$ Emissions (Metric Tons per Year) |
|---|---|
| Area | <0.01 |
| Energy | 838.49 |
| Mobile (Motor Vehicles) | 686.82 |
| Waste | 72.96 |
| Water | 233.45 |
| **Total** | **1,831.72** |
| *Calculation data and results provided in Appendix E to this Draft EIR.* | |

# 3. Project Impacts

## a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the proposed Project would have a significant impact related to GHG emissions if it would:

***Threshold (a): Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or***

***Threshold (b): Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.***

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. This section recommends that lead agencies quantify the GHG emissions of projects and consider several other factors that may be used in the determination of significance of project-related GHG emissions, including the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

Section 15064.4 does not establish a threshold of significance. Lead agencies are given discretion to utilize significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence [see CEQA Guidelines Section 15064.7(c)]. The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis, as required by CEQA Guidelines Section 15130(f)).[44] As a note, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a project's incremental contribution not cumulatively considerable.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the

[44] *See generally Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources (April 13, 2009).*

public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significance for GHG emissions if a project complies with regulatory programs to reduce GHG emissions.[45]

In the absence of any adopted numeric threshold, the significance of the proposed Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the proposed Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For the proposed Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2016–2040 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements adopted by the Climate Change Scoping Plan, the 2016–2040 RTP/SCS, the *Green LA/ClimateLA Program*, the pLAn, and the L.A. Green Building Code.

### (1) SCAQMD Thresholds

As discussed above, the SCAQMD has an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. This SCAQMD interim GHG significance threshold is not applicable to the

[45] *See, for example, San Joaquin Valley Air Pollution Control District (SJVAPCD), CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTY $CO_2e$ significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See: SCAQMD, Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014); SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014); and Final Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (October 2015).*

proposed Project, as the proposed Project is a residential/commercial project and the City of Los Angeles is the Lead Agency.

The L.A. CEQA Thresholds Guide (Thresholds Guide) does not identify any criteria to evaluate GHG emissions impacts. Thus, the potential for the proposed Project to result in impacts from GHG emissions is based on the State CEQA Guidelines Appendix G thresholds. For the reasons set forth above, to answer both of the above Appendix G thresholds, the City will consider whether the proposed Project is consistent with AB 32 and SB 375 (through demonstration of conformance with the 2016–2040 RTP/SCS), the L.A. Green Plan/ClimateLA, and the pLAn. As discussed above, OPR has noted that lead agencies "should make a good-faith effort to calculate or estimate GHG emissions from a project.[46] GHG emissions are quantified below, consistent with OPR guidelines.

## b) Methodology

A project's GHG emissions typically are very small in comparison to state or global GHG emissions. In isolation, a project has no significant direct impact on climate change. However, the increased accumulation of GHGs from more than one project and many sources in the atmosphere may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many air quality agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative, rather than project-direct impact.

The following describes the specific analytical methodology used for quantifying construction and operational greenhouse gas emissions. There are various methodologies to quantify the efficiency of the GHG reduction measures provided for in the plans and policies. Comparing the "with GHG reduction plan" scenario to the "without GHG reduction plan" scenario is one such approach, which is being used here.

### (1) Consistency with Applicable Plans and Policies

The plan consistency analysis provided below describes the Project's compliance with or exceedance of various applicable performance-based standards and consistency with applicable plans and policies adopted for the purpose of reducing GHG emissions included in the applicable portions of the Climate Change Scoping Plan, the 2016–2040 RTP/SCS, the L.A. Green Plan/ClimateLA Program, the pLAn, and the L.A. Green Building Code.

[46] *OPR Technical Advisory, p. 5.*

### (2) Estimated Reduction of Project-Related GHG Emissions Resulting from Consistency with Plans and Policies

For purposes of quantifying the reductions in GHGs due to the proposed Project's compliance with the various regulations, plans and policies identified above (AB 32, SB 32, 2017 Scoping Plan, SCAG's 2016 RTP/SCS, and L.A. Green Building Code), two Project scenarios were compared. The proposed Project's GHG emissions were compared to the emissions that would be generated by the same land uses proposed under the proposed Project, absent the various credits and emission reductions associated with the proposed Project's site-specific conditions, project design features, or prescribed code compliance measures that exceed the analytical assumptions built into the CalEEMod model under the "unmitigated" scenario (i.e., the "Project in the Absence of GHG Reduction Plans and Associated Regulations" scenario). Comparing the two scenarios is used in this analysis to demonstrate the reductions in GHG emissions due to the proposed Project's compliance with applicable regulatory plans and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under AB 32 and SB 32. This methodology does not establish a quantitative threshold of significance, rather it is provided for information purposes that demonstrate the GHG reduction levels achieved through compliance with applicable GHG reduction policies and regulations.

### (3) Quantifying GHG Emissions

The GHG emissions generated by the construction and operation of the proposed Project were estimated utilizing the CalEEMod computer model (*Version 2016.3.2*) recommended by the SCAQMD and to satisfy State CEQA Guidelines Section 15064.4(a). The primary purpose of the GHG emissions inventory is to demonstrate the reduction in the proposed Project's incremental contribution of GHG emissions that result from regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions, and to provide further justification that the proposed Project would be consistent with plans adopted for the reduction of GHG emissions. The significance of the proposed Project's GHG impacts is not based on the amount of GHG emissions resulting from the proposed Project.

#### *(a) Construction-Related Emissions*

Construction emissions were calculated using CalEEMod *Version 2016.3.2*, which is based on OFFROAD model outputs. OFFROAD is an emissions estimation model developed by CARB to calculate emissions from off-road road equipment, including construction equipment. The output values used in this analysis were modeled to be project-specific, based on equipment mix, usage rates (hours per day), and length of

construction schedule. For a complete discussion on these construction assumptions, see Section IV.B, Air Quality, of this Draft EIR. The mobile source emission methodology for on-road construction emissions, associated with worker commute and delivery of materials, uses a vehicle miles traveled rate calculated by CalEEMod in order to generate values for annual emissions. Emission factors are derived from the 2014 EMFAC model using light duty automobile factors for worker commute and heavy-duty truck factors for deliveries.

Pursuant to SCAQMD guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. As impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. Therefore, the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures address construction GHG emissions as part of the operational GHG reduction strategies.[47] Therefore, total construction GHG emissions were divided by 30 to determine annual construction emissions comparable to operational emissions.

*(b) Operational Emissions*

CalEEMod *Version 2016.3.2* was used to calculate the energy use and potential emissions generated by development of the proposed Project. These factors include motor vehicles, electricity, natural gas, water usage/wastewater generation, landscaping/maintenance equipment, and solid waste generation and disposal.

Motor vehicle emission calculations associated with operation of the proposed Project use a projection of annual VMT, which is derived from the trips provided in the proposed Project traffic study and the default trip characteristics in CalEEMod. These values account for the daily and seasonal variations in trip frequency and length associated with travel to and from the Project Site and other activities that require a commute.

GHGs are emitted as a result of activities in buildings for which electricity and natural gas are used as energy sources. Combustion of any type of fuel emits criteria pollutants and GHGs directly into the atmosphere; when this occurs in a building this is a direct emission source associated with that building and CalEEMod calculates all of these pollutants. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used, the electricity generation typically takes place offsite at a power plant;

[47] *SCAQMD Governing Board Agenda Item 31, December 5, 2008,*

electricity use generally causes emissions in an indirect manner and therefore GHG emissions have been calculated from electricity generation.

The amount of water used and wastewater generated by a project has indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat the water and wastewater. It will often be the case that the water treatment and wastewater treatment occur outside of the Project area. In this case, it is still important to quantify the energy and associated GHG emissions attributable to water and wastewater treatment and conveyance. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both methane and nitrous oxide. Thus, CalEEMod calculates indirect GHG emissions from energy use, water/ wastewater conveyance, and wastewater treatment for wastewater flows generated by the proposed Project.

Municipal solid waste (MSW) is the amount of material that is disposed of by land filling, recycling, or composting. CalEEMod calculates the indirect GHG emissions associated with waste that is disposed of at a landfill. The program uses annual waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecyle) data for individual land uses. If waste disposal information was not available, waste generation data was used. CalEEMod uses the overall California Waste Stream composition to generate the necessary types of different waste disposed into landfills. CalEEMod quantifies the GHG emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon. CalEEMod also quantifies the $CO_2$ emissions associated with the combustion of methane, if applicable. Default landfill gas concentrations were used as reported in Section 2.4 of AP-42.[48] The IPCC has a similar method to calculate GHG emissions from MSW in its 2006 Guidelines for National Greenhouse Gas Inventories.

Planting trees will sequester $CO_2$ and is considered to result in a one-time carbon-stock change. Trees sequester $CO_2$ while they are actively growing. The amount of $CO_2$ sequestered depends on the type of tree. CalEEMod uses default annual $CO_2$ accumulation per tree for specific broad species classes.

[48] *See AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, prepared by the Office of Air Quality Planning and Standards, U.S. EPA, January 1995.*

## c) Project Design Features

The following Project design features are proposed with regard to GHG emissions:

**Project Design Feature GHG-PDF-1** The proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate-controlled urban greenhouse.

**Project Design Feature GHG-PDF-2** The proposed Project will prohibit the use of natural gas-fueled fireplaces within the residential dwelling units.

## d) Analysis of Project Impacts

***Threshold (a): Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

***Threshold (b): Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

### (1) Impact Analysis

#### *(a) Consistency with Applicable Plans and Policies*

##### *(i) Consistency with the Climate Change Scoping Plan*

Table IV.D-5, below, identifies the Climate Change Scoping Plan policies that are applicable to the proposed Project and provides a consistency analysis demonstrating how the pertinent Policies relate to or are accommodated by the proposed Project. As shown, the Project would be consistent with the applicable GHG reduction plans and policies of the Scoping Plan.

**Table IV.D-5**
**Consistency with Applicable 2017 Scoping Plan Measures**

| Measures | Consistency Analysis |
|---|---|
| **Implement SB 350 by 2030:**<br>• Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and ensure grid reliability. | **Consistent**. This measure is not directly applicable to development projects, but the proposed Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has committed to diversify its portfolio of energy sources to achieve 35 percent renewables by 2020 and 50% renewables by 2030. |
| • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. | **Consistent**. Although this measure is directed towards policymakers, the proposed Project would be designed and constructed to meet the L.A. Green Building Code for renovation and new construction and will include several measures designed to reduce energy consumption. |
| • Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs. | **Consistent.** The proposed Project would be designed and constructed to meet LA Green Building Code standards, where applicable by including several measures designed to reduce energy consumption. The proposed Project includes ENERGY STAR-rated appliances within the dwelling units and would be a modern development with energy efficient boilers, heaters, and air conditioning systems. The proposed Project will also prohibit the use of natural gas-fueled fireplaces within the residential units. |
| **Implement Mobile Source Strategy (Cleaner Technology and Fuels)**:<br>• Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion." | The proposed Project would include a mix of land uses including residential and commercial that would provide residents the opportunity to live and work in the City. The proposed Project would also provide direct bicycle and pedestrian access to the Los Angeles River trail. Thus, this would reduce vehicles-per-miles traveled, promote alternatives to driving, and aim to reduce GHG emissions. As noted in Section IV.K, Traffic/Transportation, trip reduction credits were factored into the proposed Project's trip generation calculation in consultation with LADOT staff to account for the mixed-use nature of the Project. The mix of residential, office, restaurant, and urban farm land uses would provide synergy between the land uses in terms of trip making. Some of the office employees may also live on-site, and office employees, Project residents and nearby residents would be patrons of the small restaurant – particularly in the peak hours. The Project Site is also served by a |

| | |
|---|---|
| | number of transit lines which would serve to reduce vehicle trips. |
| **By 2019, adjust performance measures used to select and design transportation facilities.**<br>• Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.). | Although this is directed to CARB and Caltrans, the proposed Project would be designed to promote and support pedestrian activity on-site and in the Project Site area. The proposed Project would provide pedestrian connectivity from Casitas Avenue and the Los Angeles River. The proposed Project would provide pedestrian amenities and commercial uses facing the Los Angeles River that would promote pedestrian activity along the river. Additionally, the Project Site is within proximity to many services, job opportunities, and transit opportunities along Fletcher Drive and San Fernando Road. The nearest bus stop to the Project Site is just over ¼ miles walking distance from the Project Site and five local and inter-city transit bus routes are accessible within ½ mile walking distance from the Project Site. |
| **By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.** | Although this measure is directed towards CARB, CalRecycle, SWRCB, and local SCAQMD, the proposed Project would comply with AB 341, which sets a statewide policy goal that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020. LAMC Section 66.32.1 requires all persons who collect, remove, or transport solid waste, including C&D waste generated within the City, to obtain an AB 939 Compliance Permit from the Bureau of Sanitation. Compliance with this measure would ensure all C&D waste is transported to a Certified C&D waste processing facility for the purpose of recovering reusable and recyclable materials and disposing of non-recyclable residual materials. (see Section IV.J-4, Public Utilities, Solid Waste) |
| *Measures not applicable to this Project are not listed.*<br>*Source: California's 2017 Climate Change Scoping Plan, November 2017, pg. 103.*<br>*Parker Environmental Consultants, 2019.* | |

### *(ii) Consistency with 2016-2040 RTP/SCS*

The proposed Project would be consistent with the following key GHG reduction strategies in SCAG's 2016-2040 RTP/SCS which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Jobs and housing closer to transit; and

- Biking and walking infrastructure to improve active transportation options and transit access.

The proposed Project would revitalize an underutilized, fully developed property with a mix of multi-family residential, office, restaurant uses, and an urban farm. The proposed Project would provide up to 419 multi-family dwelling units, resulting in a residential density of approximately 73.5 units per acre. The variety of mixed uses allows for future residents to live and work on site. Although the Project Site is not located in a designated High Quality Transit Area, it is an infill development site that is relatively close to jobs and public transit. By increasing the density and utilization of the Project Site, the proposed Project would support and promote pedestrian activity in the Project area. The proposed Project would further promote the connectivity of the Project Site to the surrounding neighborhood area by providing pedestrian and bicycle access from the Los Angeles River. The proposed Project would also provide on-site bicycle storage areas for Project residents and guests to facilitate and encourage alternative modes of transit. The proposed Project would support the use of public transit, pedestrian and bicycle facilities, by accommodating bicycle and pedestrian access through the Project Site and providing connectivity between Casitas Avenue, the pedestrian path along the Los Angeles River, and the Taylor Yard. Additionally, the Project Site is currently served by a total of six local and inter-city transit operators including one Metro Rapid bus line (794), four Metro Local Bus lines (90, 91, 94, and 96) and one Metro Circulator Bus line (603), located within approximately 0.5 miles walking distance, with the nearest bus stop located within just over ¼ mile at Fletcher Drive and La Clede Avenue, which would serve to improve transportation options.

By analyzing the performance of land use changes and transportation strategies related to GHG emissions reductions, the 2016-2040 RTP/SCS concluded that GHG emissions per capita relative to 2005 emissions would be reduced by 8 percent in 2020, 18 percent in 2035, and 21 percent in 2040 in the SCAG region, which would exceed CARB's required reduction targets. These future GHG goals and conditions would be met in 2040 if investments and strategies detailed in the 2016 RTP/SCS are fully realized.[49]

Table IV.D-6 below provides a consistency analysis with each of the goals and policies of the 2016-2040 RTP/SCS:

[49] *SCAG, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, adopted April 2016.*

**Table IV.D-6**
**Consistency Analysis with the**
**2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

| Goals and Policies | Consistency Assessment |
|---|---|
| **2016-2040 RTP/SCS Goal 1** Align the plan investments and policies with improving regional economic development and competitiveness. | **Not Applicable.** This goal is directed towards SCAG and the City of Los Angeles and not does apply to the proposed Project. While this goal is not directly applicable to the proposed Project, the Proposed Project would not interfere with its implementation. |
| **2016-2040 RTP/SCS Goal 2** Maximize mobility and accessibility for all people and goods in the region. | **Consistent.** The proposed Project is located on an approximately 5.7 acre parcel that is currently fenced with vehicle access and parking allowed for the commercial uses on site. The Project Site is located along the Los Angeles River and a path along the Los Angeles River that is used as a pedestrian walkway. Currently, no access is provided through the Project Site.<br><br>As part of the proposed Project, bicycle/pedestrian paths would be provided through the Project Site, which would provide access from the Los Angeles River to Casitas Avenue. Additionally, the Project Site would provide vehicle and bicycle parking pursuant to the LAMC, which would support mobility and accessibility to the Project Site. As such, the proposed Project would support this goal. |
| **2016-40 RTP/SCS Goal 3** Ensure travel safety and reliability for all people and goods in the region. | **Consistent.** The proposed Project would comply with LAMC and LADOT standards for Project Site access. Further, the proposed Project would be subject to the site plan review requirements of the City of Los Angeles and work with the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access roads, driveways and parking areas would not create a design hazard to local roadways. As such, the proposed Project would support this goal. |
| **2016-2040 RTP/SCS Goal 4** Preserve and ensure a sustainable regional transportation system. | **Not Applicable.** This goal is directed towards SCAG and does not apply to the proposed Project. While this goal is not directly applicable to the proposed Project, the Proposed Project would not interfere with its implementation. |
| **2016-2040 RTP/SCS Goal 5** Maximize the productivity of our transportation system. | **Not Applicable.** This goal is directed towards the SCAG region to maximize the productivity of the transportation system. While this goal is not directly applicable to the proposed Project, the Proposed Project would not interfere with its implementation. |
| **2016-2040 RTP/SCS Goal 6** Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). | **Consistent.** As discussed in Section IV.B, the proposed Project would result in a less than significant impact regarding air quality during construction and operation. Further, the proposed Project's Health Risk Assessment determined that all acute and chronic health hazard indices due to freeway emissions would be under the SCAQMD threshold of 1.0, and all criteria pollutants would be below the SCAQMD's thresholds of significance for project related impacts. (the Freeway Adjacent Health Risk Assessment is provided in Appendix M to this DEIR). Further, the proposed Project would comply with LAMC Section 99.04.504.6 and include air filtration systems with filters meeting or exceeding MERV 13. As such, the proposed Project |

**Table IV.D-6**
**Consistency Analysis with the**
**2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

| Goals and Policies | Consistency Assessment |
|---|---|
| | would protect the health of the environment and the health of residents.<br><br>As discussed under Goal 1, the proposed Project would support pedestrian and bicycle activity in the Project Site vicinity by providing bicycle/pedestrian paths through the Project Site that would provide access between the path along the Los Angeles River and Casitas Avenue. The proposed Project would provide approximately 469 bicycle parking spaces, consistent with the LAMC requirements.<br><br>Further, the proposed Project's mixed-use nature would promote bicycling and walking through the Project Site and along the Los Angeles River. The Project's mixed-use nature would also provide employment and patronage opportunities on-site, which may support the residents on-site and reduce VMT. The proposed Project is located near five local and inter-city transit lines, which would further support pedestrian activity. As such, the proposed Project would support active transportation and improve air quality. |
| **2016-2040 RTP/SCS Goal 7** Actively encourage and create incentives for energy efficiency, where possible. | **Consistent.** The proposed Project would comply with applicable provisions of the City of Los Angeles Green Building Code and the CALGreen Code. Specifically, the proposed Project would incorporate infrastructure to support future electric vehicle supply equipment (EVSE), reduce the overall use of potable water by 20 percent, meet the applicable provisions of the California Energy Code, and comply with the construction and demolition solid waste handling and diversion requirements for construction and operation. In addition, the proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate-controlled urban greenhouse (see GHG-PDF-1, above). |
| **2016-2040 RTP/SCS Goal 8** Encourage land use and growth patterns that facilitate transit and active transportation. | **Consistent.** The proposed Project is currently developed with an industrial building and is currently only accessible by vehicles and pedestrians traveling along Casitas Avenue. Five bus lines operate in the vicinity of the Project Site.<br><br>The proposed Project would facilitate and encourage active transportation by providing walking and bicycle paths through the Project Site that would provide access between the pedestrian-used path along the Los Angeles River and Casitas Avenue. Additionally, the proposed Project includes restaurant uses that would be accessible from the Los Angeles River and support pedestrian activity along the River.<br><br>The proposed Project's river and mixed-use oriented design, active transportation amenities and facilities, and site location |

**Table IV.D-6**
**Consistency Analysis with the**
**2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

| Goals and Policies | Consistency Assessment |
|---|---|
| | within 0.3 miles of public transportation services would promote active transportation and transit use. The proposed Project is also within walking distance to commercial uses along Fletcher Drive. |
| **2016-2040 RTP/SCS Goal 9** Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies. | **Not Applicable.** This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. While this goal is not directly applicable to the proposed Project, the Proposed Project would not interfere with its implementation. |
| **2016-2040 RTP/SCS Land Use Policy 1** Identify regional strategic areas for infill and investment. | **Not Applicable.** This policy is directed towards SCAG to identify regional strategic areas. However, the Proposed Project would redevelop an industrial site adjacent to the Los Angeles River with a pedestrian-friendly mixed-use development facing the waterway, a regionally strategic area targeted for over $2-billion in public and private investment through multiple plans, including the Los Angeles River Revitalization Master Plan that proposes replacement of tracts of industrial land along the river with parks and complementary land uses. |
| **2016-2040 RTP/SCS Land Use Policy 2** Structure the plan on a three-tiered system of centers development.[50] | **Not Applicable.** This Land Use Policy is directed towards SCAG and not does apply to the proposed Project. While this goal is not directly applicable to the proposed Project, the Proposed Project would not interfere with its implementation. |
| **2016-2040 RTP/SCS Land Use Policy 3** Develop "Complete Communities." | **Consistent.** SCAG describes the development of "complete communities." The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.[51]<br><br>As stated above, the proposed Project includes the development of a mixed-use project, which would provide residents in close proximity to employment and patronage opportunities. Further, the proposed Project is within walking distance of commercial uses along Fletcher Drive and bus lines |

[50] *The 2016-2040 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012-2035 RTP/SCS. The complete language from the original SCAG Advisory Land Use Policies is "Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment." A more detailed description of these strategies and policies can be found on pages 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.*

[51] *SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).*

**Table IV.D-6**
**Consistency Analysis with the**
**2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

| Goals and Policies | Consistency Assessment |
|---|---|
| | that operate in the Project area. The Project would increase the connectivity of the Project Site with the surrounding community with the development of bicycle paths and pedestrian paths. The proposed Project would further provide commercial uses and landscaping, which would promote pedestrian activity, especially along the Los Angeles River. |
| **2016-2040 RTP/SCS Land Use Policy 4** Develop nodes on a corridor. | **Not Applicable.** The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents' daily needs and that support livable corridors. This policy is directed towards SCAG and City goals to identify and develop locations that promote nodes. The proposed project is relatively isolated from the nearest commercial corridors on Fletcher Avenue and San Fernando Road as the site is located at the terminus of Casitas Avenue and is geographically isolated by an LADWP easement, the Los Angeles River and the railroad right-of-way corridor. While this goal is not directly applicable to the Project Site, development of the proposed Project would not interfere with its implementation in other areas of the City. |
| **2016-2040 RTP/SCS Land Use Policy 5** Plan for additional housing and jobs near transit. | **Consistent.** As discussed within this table, the proposed Project includes a mixed-use development which would place housing and jobs (including restaurant, urban farm, and office opportunities) on the same Project Site and within 0.3 miles of public transit services and within 3 miles of downtown Glendale and downtown Los Angeles. Additionally, although the Project Site is somewhat isolated by the railway right-of-way, the SR-2, and the L.A. River Channel, the proposed Project would support pedestrian and bicycle mobility by providing paths through the Project Site and bicycle parking facilities in accordance with the LAMC. The Project area is also served by a total of three Metro transit service lines, including one Metro Rapid bus line (794), four Metro Local Bus lines (90, 91, 94, and 96) and one Metro Circulator Bus line (603). The closest bus stop to the Project Site is located at the intersection of Fletcher Drive and La Clede Avenue, approximately 0.3 mile northwest from the Project Site. Metro provides Bus Route 603 at this location. Metro Bus Route 603 provides service between the Grand/Los Angeles Trade and Technical College (LATTC) Metro Station in the City of Los Angeles and the City of Glendale. |
| **2016-2040 RTP/SCS Land Use Policy 6** Plan for changing demand in types of housing. | **Consistent.** The proposed Project would provide 419 multi-family units within a mixed-use development within the City of Los Angeles. The multi-family units would aid the City in meeting the changing demand for housing types by providing units within walking distance of employment and patronage opportunities and transit options. The proposed Project would reserve 11 percent of its base density as Very Low Income Units. The proposed Project's units would be contributing to a |

**Table IV.D-6**
**Consistency Analysis with the**
**2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

| Goals and Policies | Consistency Assessment |
|---|---|
| | range of housing choices and would be available to all persons, including existing employees and residents on the Project Site and in the Project area. |
| **2016-2040 RTP/SCS Land Use Policy 7** Continue to protect stable, existing single-family areas. | **Consistent.** The proposed Project would not demolish any existing single-family homes. The Project Site is currently developed with industrial uses. |
| **2016-2040 RTP/SCS Land Use Policy 8** Ensure adequate access to open space and preservation of habitat. | **Consistent.** The proposed Project is located within an urbanized area within the City of Los Angeles. Development of the proposed Project would not remove any existing open space areas or habitat since the Project Site is fully developed with industrial uses. The proposed Project would provide 58,176 square feet of open space that exceeds the required amount pursuant to the LAMC. Additionally, the Project Site is adjacent to the Los Angeles River and located within the River Improvement Overlay District. The proposed Project would be designed and developed consistent with the guidance of the RIO Ordinance and the Los Angeles River Revitalization Master Plan (where applicable). |
| **2016-2040 RTP/SCS Land Use Policy 9** Incorporate local input and feedback on future growth. | **Not Applicable.** This Land Use Policy is directed towards SCAG and not does apply to the proposed Project. While this goal is not directly applicable to the proposed Project, the Proposed Project would not interfere with its implementation. |
| *Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016.* | |

*(iii) Consistency with the L.A. Green Plan/ ClimateLA Program*

The proposed Project would be consistent with the City's goals and actions aimed at reducing the generation and emission of GHGs from both public and private activities are addressed through the adoption and implementation of the Green LA Plan and ClimateLA Program. Table IV.D-7 below discusses the consistency with the primary goals of the L.A. Green Plan and the ClimateLA Program.

**Table IV.D-7**
**Consistency with the Green LA Plan / ClimateLA Program**

| Goals | Consistency Analysis |
|---|---|
| **Energy** | |
| • Green the power from the largest municipal utility in the United States.<br>• Make Los Angeles a worldwide leader in green buildings.<br>• Transform Los Angeles into the model of an energy efficient city.<br>• Help Angelenos be energy misers. | **Consistent.** Although this is directed towards LADWP, the proposed Project would use energy from the LADWP, which has committed to diversify its portfolio of energy sources to achieve 35 percent renewable energy sources by 2020. The proposed Project would be designed to meet L.A. Green Building Code standards, to reduce energy consumption. The proposed Project would include ENERGY STAR-rated appliances within the dwelling units and would be developed with energy efficient boilers, heaters, and HVAC systems. Furthermore, the proposed urban farm would be fully powered by solar resources, which would reduce reliance on electricity generated by coal. Additionally, at least five percent of the total code-required parking spaces provided will be capable of supporting future electric vehicle supply equipment (EVSE). |
| **Water** | |
| • Decrease per capita water use. | **Consistent.** The proposed Project would be required to comply with a baseline flow rate identified by the L.A. Green Building Code, LAMC Section 99.04.303 and Section 99.05.303. For outdoor water consumption, the proposed Project would be required to comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). |
| **Transportation** | |
| • Lower the environmental impact and carbon intensity of transportation.<br>• Focus on mobility for people, not cars. | **Consistent.** The proposed Project would provide direct bicycle and pedestrian access to the Los Angeles River, which would promote pedestrian uses along the Los Angeles River. The proposed Project would also open the Project Site to pedestrian access between the Los Angeles River and Casitas Avenue by providing a pedestrian walkway and bicycle path adjacent to the State Park property. The location of the proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Furthermore, to encourage carpooling and the |

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| | use of electric vehicles by Project residents and visitors, at least five percent of the total code-required parking spaces provided shall be capable of supporting future EVSE. |
| **Land Use** | |
| • Create a more livable city. | **Consistent.** The proposed Project would provide commercial uses, including restaurant, office, and an urban farm that would provide future and existing residents with job opportunities.<br><br>The proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, and two-bedroom units) and would be available at a range of market rates and at an affordable rate. The proposed Project would increase the housing choices available in the Northeast Los Angeles community. The additional units would increase supply and help reduce upward pressure on housing costs. Additionally, the proposed Project's mixed-use design would allow future residents the opportunity to work on-site. |
| **Waste** | |
| • Shift from waste disposal to resource recovery. | **Consistent.** While this goal is not directed at specific development projects, the proposed Project would be consistent with City regulations aimed at reducing landfill disposal waste. LAMC Section 66.32.1 requires all persons who collect, remove, or transport solid waste, including construction and demolition waste, to obtain an AB 939 Compliance Permit from the Bureau of Sanitation. Under the requirements of the AB 939 Compliance Permit, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Furthermore, pursuant to LAMC Section 12.21 A.19, the proposed Project would provide adequate areas for collecting and loading recyclable materials to divert solid waste and address source reduction, recycling, and composting activities. As such, the proposed Project's compliance with these waste reduction methods would assist the City in achieving citywide waste reduction goals and would thus lower the proposed Project's contribution to global GHG emissions. |
| **Open Space and Greening** | |
| • Unpave paradise/create new paradises | **Consistent.** The proposed Project would incorporate a variety of public and private open space areas and amenities throughout the Project Site to accommodate the needs of residents and visitors. The proposed Project would provide approximately 58,176 square feet of total common open space and amenities on-site that would be consistent with the |

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| | requirements of the LAMC. The open space would comprise a variety of on-site amenities, including, but not limited to, communal patio, pool deck, lounge seating, outdoor barbeque, and amenity deck. The Project Site also includes a walking path along the southern and eastern portions of the Project Site, which would connect to the paved pedestrian/biking pathways along the Los Angeles River. |
| **Green Economy** | |
| • Create demand and catalyze growth of the green economic sector. | **Consistent.** This primarily focuses on expanding green technology and green businesses. However, the proposed Project would include a 42,000-square-foot urban farm on the rooftop of the parking structure. The urban farm would provide locally sourced, non-GMO, pesticide-free vegetables and herbs for the local restaurant and retail produce markets. The urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate-controlled urban greenhouse. |
| *Source: Green LA: An Action Plan to Lead the Nation in Fighting Global Warming, May 2007; and Climate LA, December 2008.*<br>*Parker Environmental Consultants, 2018.* | |

### *(iv) Consistency with the Sustainable City pLAn*

The proposed Project would be consistent with the following strategies and priority initiatives in the Sustainable City pLAn with respect to carbon and climate leadership:

- Measure and prepare for citywide climate action;
- De-carbonize LA's electrical grid;
- Reduce individual and citywide energy consumption through education and retrofitting;
- Leverage local expertise to develop and support climate-change related technologies; and
- Lead national initiatives and international efforts to establish binding climate agreements.

The proposed Project would use energy from LADWP, which has committed to diversify its portfolio of energy sources to achieved 35 percent renewables by 2020. The proposed Project would be designed and constructed to meet L.A. Green Building Code standards, where applicable, by including several measures designed to reduce energy consumption. The proposed Project includes ENERGY STAR-rated appliances within the dwelling units and would be a modern development with energy-efficient boilers, heaters, and air conditioning systems. Furthermore, the proposed urban farm would be fully

powered by solar resources, which would reduce reliance on electricity generated by coal. As such, the proposed Project would be consistent with the goals and initiatives in the Sustainable City pLAn.

*(v) Construction Equipment*

Section IV.B, Air Quality, of this EIR identifies a number of regulatory compliance measures that will have a direct reduction in the proposed Project's generation of GHGs. For example, the proposed Project would comply with Section 2485 in Title 13 of the California Code of Regulations, which limits the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction to five minutes at any location. Additionally, the proposed Project would be required to comply with South Coast Air Quality Management District Rule 1113, which limits the volatile organic compound content of architectural coatings. Adherence to these applicable regulatory compliance measures would serve to reduce the proposed Project's construction related GHG emissions.

***In conclusion, the proposed Project would be consistent with the applicable state, SCAG and City of Los Angeles plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.***

*(b) Quantification of GHG Emissions*

*(i) Construction Emissions*

Pursuant to SCAQMD methodology, the construction-related GHG emissions have been amortized over a 30-year term and factored into the proposed Project's operational emissions.

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with SCAQMD guidance for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities, off-site hauling, and construction worker commuting are considered as project-generated. Due to the speculative nature of quantifying emissions from the off-site manufacture and transport of construction materials and prefabricated building components, they were not addressed in this analysis.[52] CEQA does not require

[52] *This methodology is consistent with the recommendations of the California Air Pollution Control Officers Association (CAPCOA), CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, (2008).*

an evaluation of speculative impacts (CEQA Guidelines Section 15145). Therefore, the construction analysis does not consider such GHG emissions.

Emissions of GHGs were calculated using CalEEMod *Version 2016.3.2* for each phase and each year of construction of the proposed Project and the results of this analysis are presented in Table IV.D-8, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table IV.D-8, below, the total amount of construction-related GHG emissions from Project construction is approximately 2,758.45 $MTCO_2e$. As discussed under the Methodology subsection above, the total construction emissions are amortized over 30 years and are incorporated into the proposed Project's annualized operational emissions. Thus the 2,758.45 $MTCO_2e$ of construction emissions equates to 91.95 $MTCO_2e$ per year during the life of the Project.

**Table IV.D-8**
**Proposed Project Construction-Related Greenhouse Gas Emissions**

| Year | $CO_2e$ Emissions (Metric Tons per Year) |
|---|---|
| 2020 | 661.78 |
| 2021 | 1,376.97 |
| 2022 | 719.70 |
| **Total Construction GHG Emissions:** | **2,758.45** |

*Calculation data and results are provided in Appendix E, Greenhouse Gas Emissions Calculations Worksheets.*
*Source: CalEEMod Version 2016.3.2.*

*(ii) Operational Emissions*

The GHG emissions resulting from operation of the proposed Project, which would involve the use of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, was estimated in consideration of the proposed Project's design features, locational characteristics, and compliance with applicable regulatory measures. For purposes of demonstrating the proposed Project's consistency with AB32 and the State's goals for reducing GHG emissions to 1990 levels by 2020 and at least 40 percent below 1990 levels by 2030, the proposed Project's greenhouse gas emissions were quantified under the CalEEMod software's mitigated scenario to reflect the proposed Project being an infill development, providing increased density with accessibility to transit, the pre-installation of energy efficient ENERGY STAR-rated appliances, meet applicable water conservation requirements of the Los Angeles Green Building Code, meet the applicable provisions of the California Energy Code, and comply with the construction and demolition solid waste handling and diversion

requirements mandated in Section 66.32 of the LAMC. As shown in Table IV.D-9, below, the proposed Project's annual generation of GHG emissions is estimated to be 4,287.74 $MTCO_2e$ per year. The proposed Project's compliance with applicable laws, plans and policies adopted for the purposes of reducing GHG emissions would achieve a 12 percent reduction as compared to the same type and scale of project in the absence of such laws, policies, and plans, and a 38 percent reduction after accounting for the infill nature of the proposed development replacing an existing operational warehouse/production land use.

The proposed Project is a mixed-use, high-density redevelopment project with residential and commercial uses located in an urbanized portion of the Northeast Los Angeles Community near mass transit and a broad mix of land uses. As noted in the proposed Project Traffic Study (see Appendix J to this EIR), the proposed Project's mix of residential, office, and commercial space, proximity to transit, and location near a broad mix of existing land uses results in a net reduction of approximately 465 daily trip ends as a result of internal trip capture, pass-by trip credits, and transit adjustments. An additional 440 vehicle trips would be offset by the elimination of the manufacturing, warehousing, and production space land uses currently on-site. With these credit adjustments, the proposed Project would result in a net increase of 2,551 daily trip ends, as compared to 3,455 trips that would result from a project without these trip reduction characteristics. Based on these factors, the proposed Project would be consistent with the intent of both AB 32 and SB 375 with respect to reducing mobile source emissions associated with VMT. The proposed Project would incorporate the specific design features and compliance actions under the "Relevant Project Characteristics" listed above that would further reduce the carbon footprint of the development.

***Given the proposed Project's consistency with state, regional, and City of Los Angeles GHG emission reduction goals and objectives, the Project is consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's incremental contribution to GHG emissions and their effects on climate change would be less than significant.***

**Table IV.D-9**
**Proposed Project Operational Greenhouse Gas Emissions**

| Emissions Source | Estimated Project Generated $CO_2e$ Emissions (Metric Tons per Year) | | |
|---|---|---|---|
| | Project in the Absence of GHG Reduction Plans and Associated Regulations | Proposed Project | Percent Reduction |
| Area | 7.25 | 7.25 | 0% |
| Energy | 1,766.09 | 1,741.27 | 1% |
| Mobile (Motor Vehicles) | 4,516.58[a] | 3,910.01 | 13% |
| Waste | 123.81 | 30.95 | 75% |
| Water | 399.61 | 319.69 | 20% |
| Stationary | 0.0 | 18.34 | 0% |
| Construction Emissions [b] | 91.95 | 91.95 | -- |
| **Subtotal:** | **6,905.29** | **6,119.46** | **12%** |
| *Less Existing Project Site* | *-- [c]* | *-1,831.72* | **--** |
| **Project NET TOTAL:** | **6,905.29** | **4,287.74** | **38%** |

*Notes:*
[a] *Since mobile trips already incorporates trip reductions, the GHG emissions prior to reductions was taken by multiplying the ratio of trips prior to reductions (3,455 trips) divided by net mitigated trips (2,991 trips).*
[b] *The total construction GHG emissions were amortized over 30 years and added to the operation of the proposed Project.*
[c] *The existing emissions were not deducted from the Project without GHG Reduction Measures to demonstrate the benefit of developing on an infill lot with active industrial uses.*
*Source: CalEEMod Version 2016.3.2. Calculation data and results provided in Appendix E, Greenhouse Gas Emissions Calculations Worksheets.*

*(c) Post-2030 Considerations*

The State's existing and proposed regulatory framework would put California on the pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050, as required by AB 32 and SB 32. CARB has already achieved the 2020 goal of reducing GHG levels to below 1990 levels in 2018. Various combinations of policies and new technologies would allow California to meet the 2030 and 2050 emissions targets.

Recent studies show that the State's existing and proposed regulatory framework will put the State on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction

measures are adopted.[53] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the Statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet its 2050 target.

Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which would require CARB to ensure that Statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. The proposed Project's design features advance these goals by reducing VMT, increasing the use of electric vehicles, improving energy efficiency, and reducing water usage.

The emissions modeling in the 2017 Scoping Plan Update has projected 2030 statewide emissions which take into account known commitments (reduction measures) such as SB 375, SB 350 and other measures. The emissions inventory identified an emissions gap, meaning that emissions reductions due to known commitments do not decline fast enough to achieve the 2030 target. In order to fill this gap, the 2017 Scoping Plan Update assumed a scenario in which the Cap-and-Trade Program would deliver the reductions necessary to achieve the 2030 emissions target. Although the proposed Project is consistent with the 2017 Scoping Plan Update, additional measures to achieve the 2030 targets and beyond are outside of the City or the Project's control. Therefore, any evaluation of post-2030 Project emission would be speculative.

Executive Order S-3-05 establishes a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. This goal, however, has not been codified. That being said, studies have shown that, in order to meet the 2050 target, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its 2008 Climate Change Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 target are too far in the future to define in

[53] *Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.*

detail." In the First Update, however, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's net emissions level (4,287.74 metric tons of $CO_2e$ per year) to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's total emissions at build-out presented in Table IV.D-9, above, represents the maximum emissions inventory for the proposed Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the proposed Project is consistent with the Executive Order's horizon-year (2050) goal. Further, the proposed Project's consistency with SCAG's RTP/SCS demonstrates that the Project will be consistent with post-2020 GHG reduction goals. The 2016 RTP/SCS would result in an estimated 8 percent decrease in per capita passenger vehicle GHG emissions by 2020, an 18 percent decrease in per capita passenger vehicle GHG emissions by 2035, and a 21 percent decrease in per capita passenger vehicle GHG emissions by 2040. In March 2018, CARB adopted updated targets requiring a 19 percent decrease in VMT for the SCAG region by 2035. As the CARB targets were adopted after the 2016 RTP/SCS, it is expected that the updated targets will be incorporated into the next RTP/SCS. The 2016 RTP/SCS and/or the next RTP/SCS update are expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

For the reasons described above, the Project's post-2030 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Orders S-3-05 and B-30-15.

Additionally, the 2016-2040 RTP/SCS establishes a regulatory framework for achieving GHG levels per capita relative to 2005 emissions would be reduced by 8 percent in 2020, 18 percent in 2035, and 21 percent in 2040 in the SCAG region, which would exceed CARB's required reduction targets. The 2016-2040 RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from land use and transportation sectors. ***By exceeding the SB 375 targets for 2020 and 2035, the 2016-2040 RTP/SCS would fulfill its portion of SB 375 compliance with respect to meeting the State's***

***GHG emissions reduction goals. As such, proposed Project impacts associated with post 2030 considerations would be less than significant.***

#### (2) Mitigation Measures

The proposed Project's impacts would be less than significant. Therefore, no mitigation measures are warranted.

#### (3) Level of Significance After Mitigation

The proposed Project's impacts related to GHG emissions would be less than significant without mitigation.

## e) Cumulative Impacts

#### (1) Impact Analysis

Although the proposed Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHGs from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically are relatively very small in comparison to state or global GHG emissions and, consequently would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020 and 40 percent below 1990 levels by 2030, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, the CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining impact significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represents new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064(h)(3), the City, as lead agency, has determined that the proposed Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions.

As discussed above, the proposed Project is consistent with the applicable GHG reduction plans and policies. The analysis presented above demonstrates the efficacy of the measures contained in these policies. Moreover, while the proposed Project is not

directly subject to the Cap-and-Trade Program, that Program will indirectly reduce the proposed Project's GHG emissions by regulating "covered entities" that affect the proposed Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions if California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 and SB 32 are met. ***Thus, given the proposed Project's consistency with State, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, the proposed Project's impacts would not be cumulatively considerable and are concluded to be less than significant.***

### (2) Mitigation Measures

Cumulative impacts related to GHG emissions would be less than significant. Therefore, mitigation measures would not be required.

### (3) Level of Significance After Mitigation

Cumulative impacts related to GHG emissions would be less than significant without mitigation.

# IV. Environmental Impact Analysis

# E. Hazardous Materials/Risk of Upset

## 1. Introduction

The following section describes the potential adverse impacts on human health and the environment due to exposure to hazardous materials or conditions that could be encountered as a result of construction and operation of the proposed Project. Except where footnoted otherwise, this Section is based upon the following site-specific investigations:

- Phase I Environmental Site Assessment, 2750 and 2800 Casitas Avenue, Los Angeles California, Assessor Parcel Number 5442-002-012, prepared by Leighton and Associates, Inc. (Leighton), dated May 31, 2016 (2016 Phase I ESA).

The purpose of the 2016 Phase I ESA was to identify historic, controlled, existing, or potential Recognized Environmental Conditions (REC) affecting the Project Site. A REC refers to the presence or likely presence of any hazardous substance or petroleum product on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the Project Site or into the ground, groundwater, or surface water of the Project Site. The 2016 Phase I ESA is included as Appendix F.1 of this EIR.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) Federal Regulations

Federal laws and regulations governing the management and control of hazardous substances have been established to protect the environment. Regulations that fall under the jurisdiction of the United States Environmental Protection Agency (USEPA) and include the following:

#### *(a) Resource Conservation and Recovery Act*

The Resource Conservation and Recovery Act (RCRA) was enacted in 1976 and provides the framework for the national hazardous and non-hazardous waste management systems (United States Code [USC], Title 42, Chapter 82). This framework includes the determination of whether hazardous wastes are being generated, and techniques for tracking wastes to eventual disposal (cradle to grave responsibility).

#### *(b) Occupational Safety and Health Administration*

Title 29 Code of Federal Regulations (CFR), Part 1910, contains the Occupational Safety and Health Administration (OSHA) requirements for workers regarding hazardous waste management operations and emergency responses involving hazardous waste. These regulations promote worker safety, other training, and a worker's right-to-know.

#### *(c) Comprehensive Environmental Response, Compensation, and Liability Act*

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), or "Superfund," creates national policy and procedures to identify and clean up sites where hazardous substances have been released into the environment and provides statutory definitions of hazardous substances and petroleum products under 42 USC Chapter 103.

#### *(d) Superfund Amendment and Reauthorization Act*

The Superfund Amendment and Reauthorization Act (SARA), Title III of the 1986 Emergency Planning and Community Right to Know Act (42 USC Chapter 116), which requires facilities to report items on USEPA Toxic Chemical Inventory Reporting Forms.

### (2) State Regulations

At the State level, California has developed hazardous waste regulations that are similar to the federal laws, but that are more stringent in their application in some cases. The term "hazardous material" is defined in California Health and Safety Code (HSC) Section 25501 as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment. Hazardous materials include, but are not limited to, solvents, mercury, lead, asbestos, fuels, oils, paints, cleansers, and pesticides that are used in activities such as building and grounds maintenance. Potential adverse effects include those associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; emitting hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-

quarter mile of an existing or proposed school; and location of the proposed Project on a hazardous materials site.

*(a) Hazardous Waste Control Law*

The Hazardous Waste Control Law (HWCL) empowers the Department of Toxic Substances Control (DTSC), a division of California Environmental Protection Agency (CalEPA) (formerly part of the Department of Health Services), to administer the state's hazardous waste program and implement the federal program in California. California Code of Regulations (CCR) Titles 22 and 23 address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes. Title 23 addresses public health and safety issues related to hazardous materials and wastes and specifies disposal options.

*(b) Department of Toxic and Substances Control*

The DTSC has the primary responsibility for enforcement and implementation of hazardous waste control laws in the State. The mission of DTSC is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products. However, this responsibility is shared with other state and local government agencies, including the State Water Resources Control Board (SWRCB), the Los Angeles Regional Water Quality Control Board (LARWQCB), and city and county governments.

*(c) Hazardous Materials Release Response Plans and Inventory Law of 1986*

The Hazardous Materials Release Response Plans and Inventory Law of 1986 (Assembly Bill [AB] 2185; HSC Section 25500, et seq.) governs hazardous materials handling, reporting requirements, employee training, and local agency surveillance programs.

*(d) Proposition 65*

Proposition 65 (CCR Title 22, Section 12000, et seq.) focuses on carcinogenic or teratogenic contaminants. Proposition 65 establishes a list of chemicals and substances and the level at which they are believed to potentially cause cancer. Proposition 65 restricts the discharge of listed chemicals at certain levels into known drinking water sources, requires public notification of unauthorized discharges, requires clear warning prior to a known and intentional exposure to a listed substance, and establishes a right of action for citizens and separate notice requirements for government employees and counties.

#### *(e) California Health and Safety Code*

California HSC, Division 20, Chapter 6.7, governs the State's Underground Storage Tank (UST) program and regulates the program in CCR Title 23, Division 3, Chapter 16 and 17.

#### *(f) Porter-Cologne Water Quality Control Act*

The Porter-Cologne Water Quality Control Act, adopted in 1969 and revised in 2009, sets forth water quality regulations in California and protects water quality as well as beneficial uses of water. The Porter-Cologne Water Quality Control Act authorizes the RWQCBs[1] to supervise cleanup efforts at spill sites that have affected groundwater.

### (3) City Regulations

The Los Angeles Municipal Code (LAMC) Chapter 5, Article 7 (commonly called the City of Los Angeles Fire Code [Fire Code]), sets forth laws for hazardous material storage and handling, and safe guarding of life and property from fire, explosion, panic, or other hazardous conditions that may arise in the use of buildings, structures or other premises.

The City of Los Angeles Fire Department (LAFD) Hazardous Materials Section is the administrative agent for the California HSC and CCRs related to Emergency Planning and Community Right-to-Know laws (AB 2185; HSC Section 25500 et seq. and Proposition 65 [CCR, Title 22, Section 12000 et seq.]), and federal SARA Title III (42 USC Chapter 116). Three units within LAFD process information related to hazardous materials. The Disclosure Unit is responsible for enforcing the Disclosure Law, which requires all establishments (including new and existing businesses) storing, producing, or utilizing hazardous substances to maintain an on-site inventory. The Business Plan Unit ensures that businesses take the right measures to mitigate any dangers. The Risk Management and Prevention Unit is responsible for evaluating Risk Management Prevention Plans (RMPP) that businesses must submit according to HSC Section 25531 et. seq. Preparation of a RMPP is required of businesses that handle 55 gallons, 500 pounds, 200 cubic feet, or more of acutely hazardous materials.

The LAFD Bureau of Fire Prevention and Public Safety maintains an Underground Tank Unit, which governs the Underground Tank Program pursuant to California Health and Safety Code, Division 20, Chapter 6.7 and regulates the program under CCR Title 23, Division 3, Chapters 16 through 18. The LAFD regulates USTs within the boundaries of the City pursuant to the Fire Code. All USTs used for fuel, solvents, and other liquids must be monitored for leakage. The law requires UST implementations, removals, or

[1] *The Los Angeles Regional Quality Control Board has jurisdiction over the Project Site and its surrounding area.*

alterations to be regulated under permit from the LAFD. All USTs installed after January 1, 1984 are required to have secondary containment in addition to a leak direction system. All UST units installed prior to January 1, 1984 are classified as existing tanks and are required to have a soil analysis report and continuous monitoring device.

## b) Existing Conditions

### (1) Historic Uses of the Project Site

Based on a review of aerial photographs, the Project Site was vacant, undeveloped land until approximately 1928 when activities associated with the neighboring Southern Pacific Railroad's Taylor Yard railroad maintenance facility to the southeast expanded north to include the Project Site. Historical operations of the Taylor Yard included locomotive and refrigeration car maintenance, rail car sorting and assembly, locomotive fueling, rail car storage, switching, equipment storage, and utility department shops for electrical, mechanical, and plumbing works. As part of the Taylor Yard, the Project Site was utilized by the Southern Pacific Railroad Buildings and Bridges for service vehicle maintenance and repair and by the Maintenance of Way Department for maintaining the tracks and rights-of-way, as well as by the carpenters, communications, electrical shop, and water services departments. In 1990, rail operations were terminated on approximately 175 acres of the Taylor Yard, including Taylor Yard Parcel H, of which the Project Site is a portion. In the late 1990s, the Project Site was redeveloped into its current configuration and land use as a light manufacturing facility.

### (2) Hazardous Materials Database Search

The Project Site is identified on the following databases: FINDS, CA HAZNET, CA EMI, RCRA-LQG, US AIRS, and EDR US Historical Auto Station.[2] As discussed above, the Project Site was once part of the Taylor Yard, which is also listed on additional government databases. The Project Site addresses were also identified in the Phase I ESA report related to the former Taylor Yard facility ("Taylor Yard Phase I ESA"). The Taylor Yard Phase I ESA found that the Project Site is included on the following government lists: underground storage tank (UST), aboveground storage tank (AST), Toxic Pits, Cortese, Historical Cortese, LA County Site Mitigation, Voluntary Cleanup Program (VCP), Response, EnviroStor, Historical Cal-Site, CA Bond Plan, RCRA Generator, Spills, Leaks, Investigation, and Cleanup (SLIC), Financial Assurance, Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) No Further Remedial Action Planned (NFRAP), California Hazardous

[2] *These regulatory databases are defined in the Phase I Environmental Site Assessment, 2750 and 2800 Casitas Avenue, Los Angeles California, Assessor Parcel Number 5442-002-012, prepared by Leighton & Associates, dated May 31, 2016 (See Appendix F.1 to this Draft EIR).*

Material Incident Reporting System (CHMIRS), and Waste Discharge System (WDS) lists.

Chemicals of Concern (COCs) identified in the soil and/or groundwater in the Taylor Yard Phase I ESA are primarily arsenic, lead, polynuclear aromatic hydrocarbons (PAHs), tetrachloroetheylene (PCE), total petroleum hydrocarbons (TPH), and trichloroethylene (TCE). According to information obtained from the DTSC's EnviroStor website, previous reports, and previous investigations completed by Leighton on the neighboring Taylor Yard Parcel G-1, areas of concern from the former Taylor Yard are primarily located within Parcel G-2 and the southern portion of Parcel G-1, approximately 0.6 mile southeast (hydraulically down-gradient) of the Project Site.

Additionally, the Project Site is located within the San Fernando Valley Area 4 Pollock Well Field (SFV4), an area of contaminated groundwater in the City. The contaminated groundwater, which underlies an area of approximately 5,860 acres, contains PCE and TCE at concentrations above drinking water standards. Results of groundwater monitoring conducted within SFV4 from 1981 to 1987 have revealed that over 50 percent of the water supply wells in the eastern portion of the San Fernando Valley Groundwater Basin were contaminated with various chlorinated volatile organic compounds (VOCs), specifically TCE and PCE.

The 2016 Phase I ESA found that none of the sites identified in the hazardous materials database search represent an adverse effect to the Project Site based on one or more of the following: nature of the database listing and not appearing on a database that reports unauthorized releases of hazardous substances, reported regulatory agency status (i.e., Case Closed), reported nature of the case (soil contamination only), distance of the facility to the Project Site, and/or location of the facility with respect to anticipated groundwater flow direction (southeast).

## c) Previous Site Assessments and Other Reports

As discussed above, the Project Site was historically a part of the Taylor Yard, which was owned and operated by the Southern Pacific Company/Union Pacific Railroad Company (UPRR). The Project Site was used for the storage, maintenance, and repair of infrastructure, equipment, and service vehicles. Due to past uses and current uses of the Project Site, previous analyses documenting the hazardous conditions on the Project Site and in the Project area have been conducted. During preparation of the 2016 Phase I ESA, Leighton reviewed and incorporated these reports into the 2016 Phase I ESA. A list of prior studies done on the Project Site is provided below. Additionally, a chronological summary detailing the findings of each report is provided below and presented in 2016 Phase I ESA (included in Appendix F.1).

- ERM West, Inc. (ERM), Portions of the Final Remedial Action Plan, Taylor Yard Sale Parcel, Los Angeles, California, dated September 17, 1991.
- Pilko & Associates, Inc. (Pilko), Phase I Environmental Site Assessment Parcel H – Taylor Railyard, dated June 1998.
- CDM Smith (CDM), Union Pacific Railroad Company 2012 Groundwater Monitoring Report, Taylor Yard, Los Angeles, California, dated August 2012.
- Partner Engineering and Science, Inc. (Partner), Phase I Environmental Site Assessment Report, Casitas Line of Credit, 2750 and 2800 Casitas Avenue, Los Angeles California, dated August 18, 2014.
- Leighton and Associates, Inc., Phase I Environmental Site Assessment, 2750 and 2800 Casitas Avenue and 2800 Kerr Street, Los Angeles California, Assessor Parcel Number 5442-002-012, dated August 12, 2015.
- Leighton and Associates, Inc., Phase II Environmental Site Assessment Report 2750 and 2800 Casitas Avenue and 2800 Kerr Street, Los Angeles, California, dated October 1, 2015.
- Leighton and Associates, Inc., Additional Phase II Environmental Site Assessment Report 2750 and 2800 Casitas Avenue and 2800 Kerr Street, Los Angeles, California, dated December 22, 2015.
- Enviro-Tox Services, Inc., Human Health Risk Assessment Report, 2750 and 2800 Casitas Avenue and 2800 Kerr Street, Los Angeles, California, dated January 28, 2016.

The primary purpose of these reports was to analyze and monitor the potential hazardous materials and contaminants that are present on the Project Site from historical land uses. The purpose of the previous Phase I ESAs was to identify historic, controlled, existing, or potential RECs affecting the Project Site. The purpose of the Phase II ESAs, dated October 2015 and December 2015, was to evaluate soil and groundwater on the Project Site where there is suspected petroleum-impacted media and to identify TPH and VOCs. Following the findings of the Phase II ESAs, Enviro-Tox Services, Inc. (ETSI) conducted a Human Health Risk Assessment (HHRA) for the Project Site to determine whether trace concentrations of metals and petroleum hydrocarbons detected in soil and VOCs detected in soil gas at the Project Site represent a health threat to future on-site residents.

As discussed above, rail operations were terminated on approximately 175 acres of Taylor Yard in 1990. This parcel underwent accelerated soil cleanup activities to facilitate the transfer or sale of the parcel. The Project Site is located within this parcel. According to ERM's 1991 report, areas of concern identified in the northwestern portion of the Project Site include a drum storage area, former fueling area, and an equipment storage area. Soil sampling was conducted and analyzed for TPH, metals, polychlorinated

biphenyls (PCBs), and/or VOCs. TPH, lead, PCBs, and methylene chloride were detected in soil samples up to 10 feet below ground surface (bgs). Information regarding the removal or remediation of the detected contaminants was not included in the information reviewed by Leighton for the 2016 Phase I ESA.

The remaining 69 acres of the Taylor Yard, referred to as the "Active Yard" or Parcel G, remained in use as a maintenance and locomotive fueling yard until 2003. Parcel G was further subdivided into Parcel G-1 (19 acres in the northern portion, adjacent to Project Site) and Parcel G-2 (50 acres in the southern portion, approximately 0.6 mile southeast of the Project Site). Parcel G-1 was sold to the California Department of Parks and Recreation, and Parcel G-2 continued as the Active Yard. Prior to the sale of Parcel G-1, UPPR conducted site assessment and remedial activities under the oversight of the DTSC. Partial closure of Parcel G-1 (soil only to industrial standards) was obtained from the DTSC and the Parcel was sold to California Department of Parks and Recreation circa 2003.

During the completion of Pilko's 1998 Phase I ESA report on the Project Site, one main building (estimated to be 15,000 to 20,000 square feet) and approximately a dozen smaller buildings (estimated at 200 square feet or less) occupied the Project Site as part of the former Taylor Yard. According to Pilko, one 12,000-gallon unleaded gasoline UST and one 8,000-gallon diesel UST were removed from the southern portion of the Project Site in November 1989 by Canonie Environmental (Canonie) as part of a program to remove USTs throughout the Taylor Yard. Elevated concentrations of petroleum hydrocarbons were detected at 9 of the 16 UST locations. Soil sampling results and locations completed by Canonie were not included in the Pilko report, and it is unknown if hazardous substances and/or petroleum products were detected in soil on the Project Site.

In August 2014, Partner prepared a Phase I ESA of the Project Site. Partner identified the following RECs in connection with the Project Site:

- The historical use of the Project Site as a portion of the former Taylor Yard and the known impacts and/or concerns associated with the Taylor Yard (i.e., two historical USTs and results of soil sampling completed by ERM in 1991).
- The Project Site was occupied by Nelson Nameplate Company (aka Nelson-Miller, Inc.) for industrial purposes. The current and historical use of hazardous materials on site, including halogenated solvents, the presence of the clarifier system, and the duration of operation of the industrial facility at the Project Site (approximately 16 years).
- The known VOC-impacted groundwater in the Project Site vicinity.

Based on the above RECs, Partner recommended a subsurface investigation be conducted to determine the presence or absence of soil and/or groundwater contamination due to the historical use of the Project Site. An additional Phase I ESA report (dated August 12, 2015 and prepared by Leighton) recommended to further assess the presence of hazardous substances and petroleum products in soil and soil gas on the Project Site for the same RECs identified in Partner's report.

Leighton performed an initial Phase II ESA in October 2015. The Phase II ESA discovered the presence of petroleum products in soil in the southern portion of the Project Site, elevated lead in one soil sample on the western portion of the Project Site, and VOCs in shallow soil gas samples collected throughout the Project Site; however, primarily located in the northern portion of the Project Site.

Information was also obtained during the review of historical aerial photographs providing coverage of the Project Site. The historic aerial photographs were reviewed to assess for the presence of physical features (e.g., soil discoloration, aboveground storage tanks, drums storage areas, fuel dispensers, etc.) where hazardous substances and/or petroleum products may have been stored, used, and/or disposed at the Project Site, and formed the basis for further investigation. Based upon the analytical test data collected during the above-mentioned Phase II investigation, additional investigative activities were recommended to (a) evaluate the vertical and lateral extent of petroleum hydrocarbon-affected soil discovered in the area of the former USTs and the extent of lead-affected soil that exceeds DTSC's Office of Human and Ecological Risk (HERO) HHRA screening level for total lead in a residential setting, and (b) further assess the low concentrations of VOCs detected in the prior soil gas samples to build a more comprehensive dataset for the completion of a HHRA.

In December 2015, Leighton prepared an Additional Phase II ESA. Leighton oversaw the advancement of 14 additional exploratory borings at the recommended locations noted in the initial Phase II ESA. 12 borings were advanced in areas outside and around the on-site building and two borings were advanced inside the on-site building, within the portion of the building occupied by Nelson-Miller, Inc. Based on the findings of the initial and additional Phase II ESAs, Leighton made the following conclusions and recommendations:

- TPH in the diesel range (TPHd) and TPH in the oil range (TPHo) were detected at concentrations exceeding LARWQCB Maximum Soil Screening Levels (MSSLs) of 100 mg/kg in soil samples collected at depths primarily between 15 and 20 feet bgs in borings LB12, LB13, and LB28. These borings are located in the vicinity of two former USTs associated with the historical Taylor Yard railroad operations that occurred on the Project Site. The source of the TPHd and TPHo in soil is likely

associated with a petroleum product release(s) from the historical USTs. Since the extent of impacted soil is primarily confined to depths of 15 and 20 feet bgs in the southeast corner of the Project Site, the potential risk (inhalation, ingestion, and dermal contact) to current and future occupants is very low. Additionally, soil samples collected at depths greater than 20 feet bgs (down to 40 feet bgs) were not affected with TPHd and/or TPHo, representing at least 20 feet of clean soil between the bottom of the impacts and potential groundwater. It is unlikely that groundwater has been affected by the historical TPH release(s). Based on this information, additional assessment or remediation regarding the TPHd and/or TPHo impacted soil is not warranted.

- Total lead exceeded DTSC's residential soil screening level in one soil sample, LB4 at 0.5 foot bgs. The source of the lead is unknown; however, lead-affected soil was previously detected at the Project Site as a result of historical railroad operations. The vertical and lateral extent of the lead contamination has been defined. The concentrations of lead detected in the soil samples collected at the Project Site identified the 95% upper confidence limit (UCL) of the population mean for lead at the Project Site to be 41.34 mg/kg, which is well below DTSC's residential soil screening level of 80 mg/kg. In addition, the soluble lead in the 0.5-foot-bgs soil sample collected from boring LB4 did not exceed its Soluble Threshold Limit Concentration (STLC) and will not require management as a CA hazardous waste. Based on these analyses, additional investigation of the lead in the area of boring LB4 is not warranted, and the soil in the area of boring LB4 does not require removal or special handling with respect to lead during construction activities.

- PCE, benzene, and 1,2,4-trimethylbenzene were detected in soil gas samples above DTSC's adjusted screening level for residential uses and regional screening levels established for residential land use. The source of the VOCs detected in the soil gas samples is unknown; however, PCE has been detected in the groundwater in the Project Site vicinity and is a possible source for the PCE detected in the soil gas beneath the Project Site. Soil gas samples exceeding the screening criteria were primarily located in the northern portion of the Project Site, currently an asphalt-paved parking area. The combined cancer risk for VOCs in soil gas between 3 and 5 feet bgs at the Project Site is above the EPA's screening value but within the USEPA established acceptable incremental cancer risk range. Thus, as further discussed below, a HHRA was conducted for the Project Site to determine if any form of mitigation or remediation is necessary prior to redeveloping the Project Site for residential use and to address whether protection

of construction workers during redevelopment of the Project Site is recommended.

In January 2016, ETSI completed an HHRA for the Project Site using the soil and soil gas data collected from the Project Site in August and December 2015. ETSI concluded that both TPH and lead in soil did not pose a health threat to future on-site residents or construction workers. Additionally, results of the HHRA indicated that exposure to chemicals detected in soil gas could carry a potential cancer risk of less than four cancer cases in an exposed population of one million people. The estimated incremental cancer risk was within the risk management range considered acceptable to the California DTSC. The Hazard Indices estimated to result from inhalation of indoor air potentially impacted by VOCs detected in soil gas were all below the DTSC acceptable value of 1.0. Therefore, ETSI concluded that VOCs detected in soil gas at the Project Site do not pose a health threat to future on-site residents. Based on the results of the HHRA, on-site remediation is not warranted, and the Project Site could be redeveloped for residential use without the need to install a vapor intrusion mitigation system.

# 3. Project Impacts

## a) Thresholds of Significance

In 2015, the California Supreme Court in *California Building Industry Assn. v. Bay Area Air Quality Management* District (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project.[3] The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to hazardous materials if it would:

***Threshold (a)*** ***Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous***

[3] *California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369, Case No. S213478.*

***materials;***

***Threshold (b)*** ***Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;***

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

***Threshold (d)*** ***Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;***

***Threshold (e)*** ***For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area;***

***Threshold (f)*** ***For a project located within the vicinity of a private airport strip, result in a safety hazard for people residing or working in the project area;***

***Threshold (g)*** ***Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or***

***Threshold (h)*** ***Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions. The Thresholds Guide identifies the following criteria to evaluate hazards and hazardous materials:

*(i) Risk of Upset/Emergency Preparedness*

- *The regulatory framework (for the potential accidental release or explosion of a hazardous substance);*
- *The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;*

- *The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences;*

*(ii) Human Health Hazards*

- *The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance;*
- *The regulatory framework for the health hazard;*
- *The probable frequency and severity of consequences to people from exposure to the health hazard; and*
- *The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.*

## b) Methodology

To evaluate impacts related to hazards and hazardous materials associated with construction and operation of the proposed Project, a Phase I Environmental Assessment was completed for the Project Site. The 2016 Phase I ESA included a review of state and federal records and databases to evaluate present and historic uses on the Project Site, a review of prior Phase I ESA's, Phase II ESA and a Groundwater Monitoring Report conducted for the Project Site and adjacent Taylor Yard properties, a Human Health Risk Assessment conducted for Project Site, as well as a Project Site reconnaissance to determine if any RECs, historical RECs (HRECs), or controlled RECs (CRECs) exist at the Project Site. The findings of the 2016 Phase I Assessment are provided above, under Subsection c) Previous Site Assessments and Other Reports.

## c) Project Design Features

The following project design feature is proposed to address conditions associated with potential hazards and hazardous materials.

**Project Design Feature HAZ-PDF-1:** A Soil Management Plan (SMP) will be prepared to address potential hazardous substances and/or petroleum products that may be discovered during site development. Observations should be made during construction for areas of possible contamination such as, but not limited to, the presence of underground facilities, buried debris, waste drums, and USTs, stained soil or odorous soils. The SMP will be implemented to meet the performance standards of the Department of Toxic Substances Control, Regional Water Quality Control Board, City of

Los Angeles Department of Building and Safety, and LAFD for residential development and provide a framework under which work can proceed safely, and to ensure hazardous materials are properly handled, segregated, stockpiled, and disposed of at a licensed disposal facility.

## d) Analysis of Project Impacts

***Threshold (a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

### (1) Impact Analysis

#### *(a) Construction Impacts*

Based on the results of the 2015 on-site assessment activities and the conclusions of the January 2016 HHRA and the 2016 Phase I ESA, the Project Site and vicinity are considered an HREC and do not pose a health risk to future on-site residential occupants. Evidence of RECs and CRECs were not identified on the Project Site. No off-site RECs were identified that would negatively impact the Project Site.

While the 2016 Phase I ESA concluded that there are no known on-site or off-site HRECs, RECs, or CRECs that would negatively affect future development of the Project Site, due to the nature of the historic uses on the site and past remediation activities, precautionary observations should be made during future property development for areas of possible contamination such as, but not limited to, the presence of underground facilities, buried debris, waste drums, and USTs, stained soil, or odorous soils. Should such materials be encountered, they would be addressed in compliance with applicable laws and regulations. The 2016 Phase I ESA recommended that a soil management plan be prepared to address potential hazardous substances and/or petroleum products that may be encountered during site redevelopment (see HAZ-PDF-1, above).

The proposed Project would require the routine transport, use and disposal of cleaning solvents, fuels, paints and paint-related products, waste oil, spent solvents, oily rags and other potentially hazardous materials commonly associated with construction activities. Construction activities would involve the use and storage in small quantities of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. All potentially hazardous materials used during demolition and construction activities would be handled, contained, stored, and used in accordance with all applicable local, State, and federal regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. ***Therefore, construction of the Project would***

***not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The impact would be less than significant.***

*(b) Operation Impacts*

The proposed Project includes the construction of five mixed-use buildings with a total of 419 residential units and approximately 64,000 square feet of commercial space. No hazardous materials other than small amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. Such materials are typically used and stored on site in quantities less than 220 pounds and are considered Conditionally Exempt Small Quantity Generators (CESQG) by the USEPA. The proposed Project would also include an urban farm, which would result in the use and transport of substances routinely associated with farming practices, such as soil amendments and fertilizers. Based on the approximate size of the urban farm being proposed (i.e., 42,000 square feet), it is anticipated that the urban farm would be classified as a Small Quantity Generator (SQG), generating between 220 and 2,200 pounds per month of hazardous waste. As such, the urban farm use must comply with USEPA requirements for managing hazardous waste, which includes obtaining an EPA Identification number and following the USEPA's recommended best management practices for transporting, storing, managing, and disposing of hazardous materials in accordance with USEPA regulations. Further, the use of these substances would comply with State Health Codes and Regulations. The operation of the proposed Project would not use, transport, or dispose of hazardous materials in large quantities (more than 2,200 pounds per month), and thus would not be considered a Large Quantity Generator (LQG). The Project's proposed buildings would comply with current regulations set by the Los Angeles Department of Building and Safety (LADBS). ***Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during operation, and a less than significant impact would occur.***

## (2) Mitigation Measures

No mitigation measures are required.

## (3) Level of Significance After Mitigation

Impacts associated with the routine transport, use or disposal of hazardous materials would be less than significant prior to mitigation.

***Threshold (b) Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

## (1) Impact Analysis

### *(a) Construction Impacts*

As noted above, based on a review of state and federal records and databases to evaluate present and historic uses on the Project Site, a review of prior Phase I ESA's, Phase II ESA and a Groundwater Monitoring Report conducted for the Project Site and adjacent Taylor Yard properties, a Human Health Risk Assessment conducted for Project Site, as well as a Project Site reconnaissance, the 2016 Phase I ESA concluded that there are no HRECs, RECs or CRECs in connection with the Project Site. The proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. However, due to the nature of the historic uses on the site and past remediation activities, the 2016 Phase I ESA recommended that precautionary observations be made during future property development for areas of possible contamination such as, but not limited to, the presence of underground facilities, buried debris, waste drums, and USTs, stained soil or odorous soils. Incorporation of HAZ-PDF1 would further ensure the proper handling and disposal of any potential hazardous materials if any unforeseen hazardous materials or soils are encountered during the site clearing and grading/excavation phases. ***As stated above, adherence to all applicable rules and regulations pertaining to the use, storage, and transport of potentially hazardous materials during construction would reduce potentially significant impacts to less-than-significant levels.***

### *(b) Operational Impacts*

With respect to operations, the proposed Project would not transport, use, or dispose of hazardous materials as a normal course of operation that would result in reasonably foreseeable upset or accidental conditions. The volume and type of products and chemicals used in typical multi-family and mixed-use developments are those involved in the cleaning and maintenance of residential and commercial retail properties, including restaurants and public spaces. Additionally, the proposed urban farm would be expected to store and use fertilizers in small quantities on-site. All materials used and stored on-site would be regulated and managed in accordance with manufacturers materials data sheets and all applicable rules and regulations. ***As such, the proposed Project would not create a significant hazard to the public or the environment through reasonably***

***foreseeable upset and accident conditions involving the release of hazardous materials into the environment.***

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Significance After Mitigation

With incorporation of HAZ-PDF-1, above, the potential for the proposed Project to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant.

***Threshold (c) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?***

### (1) Impact Analysis

The Los Feliz Charter School for the Arts, located at 2709 Media Center Drive, is the only school within a 0.25-mile radius of the Project Site.

The Project Site is developed with one approximately 117,000-square-foot light manufacturing/warehouse/film production building and its associated surface parking. The building on-site was constructed in 1999. The use of asbestos, lead, and PCB in building and electrical equipment was banned prior to 1999. Therefore, due to the building's age, there is no risk of asbestos, lead, or PCB release into the environment during building demolition.

No hazardous materials other than small amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes, and substances routinely used with urban farming, would be utilized on the Project Site. As stated above, the urban farm would be considered a SQG and would transport, store, manage and dispose of any hazardous materials in accordance with the USEPA's best management practices for SQGs. The use of these substances would also comply with State Health Codes and Regulations. ***Any hazardous materials would be handled, transported and disposed in accordance with all applicable local, State and federal regulations. As such, the proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and, as such, would have a less-than-significant impact upon the nearby school.***

### (2) Mitigation Measures

Project impacts related to the use or handling of hazardous materials near a school would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Project impacts related to the use or handling of hazardous materials near a school would be less than significant without mitigation.

***Threshold (d) Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment caused in whole or in part from the Project's exacerbation of existing environmental conditions?***

### (1) Impact Analysis

As discussed above, the Project Site is identified on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Specifically, the Project Site is identified on the following databases: FINDS, CA HAZNET, CA EMI, RCRA-LQG, US AIRS, and EDR US Historical Auto Station.[4] Additionally, the Project Site was formally a part of the Taylor Yard property, which was identified as an UST, AST, Toxic Pits, Cortese, Historical Cortese, LA County Site Mitigation, VCP, Response, EnviroStor, Historical Cal-Site, CA Bond Plan, RCRA Generator, SLIC, Financial Assurance, CERCLIS NFRAP, CHMIRS, and WDS site in the 2016 Phase I ESA. The 2016 Phase I ESA concluded that no further action is necessary with regard to the Project Site's listing on the FINDS, CA HAZNET, CA EMI, RCRA-LQG, US AIRS, and EDR US Historical Auto Station databases as evidence of RECs and CRECs was not identified on the Project Site.

Based on a review of state and federal records and databases to evaluate present and historic uses on the Project Site, a review of prior Phase I ESA's, the Phase II ESA and a Groundwater Monitoring Report conducted for the Project Site and adjacent Taylor Yard properties, a Human Health Risk Assessment conducted for Project Site, as well as a Project Site reconnaissance, the 2016 Phase I ESA concluded that precautionary observations should be made during future property development for areas of possible contamination, such as, but not limited to, the presence of underground facilities, buried debris, waste drums, and USTs, stained soil, or odorous soils. As such, the proposed

[4] *Leighton and Associates, Inc., Phase I Environmental Site Assessment, 2750 and 2800 Casitas Avenue, Los Angeles California, Assessor Parcel Number 5442-002-012, May 31, 2016 (See Appendix F.1 to this Draft EIR).*

Project would implement HAZ-PDF-1, which requires the preparation and implementation of a Soil Management Plan to address potential hazardous substances and/or petroleum products that may be discovered during construction. Additionally, the proposed Project would be required to obtain approval from the LAFD and the Department of Public Works for the transport, creation, use, containment, treatment, and disposal of the hazardous materials prior to the issuance of a use of land or building permit. Construction and operation of the proposed Project would not create a significant hazard to the public or the environment as a result of being on a list of hazardous materials site pursuant to Government Code Section 65962.5. The proposed Project would not cause a significant hazard to the public or the environment. ***Adherence to applicable regulatory compliance measures and implementation of HAZ-PDF-1 would reduce any potential hazardous impacts during the construction phase to less than significant levels.***

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Significance After Mitigation

Potential impacts associated with the Project Site being located on a regulatory database pursuant to Government Code 65962.5 would be less than significant prior to mitigation.

***Threshold (e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the project area?***

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Burbank Bob Hope Airport is the closest airport to the Project Site and is located 9 miles northwest from the Project Site. Thus, the Project would have no impact with respect to Threshold (e). No further analysis is required.

***Threshold (f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?***

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Project Site is not located near any private airstrip. Thus, the proposed Project would have no impact with respect to Threshold (f). No further analysis is required.

***Threshold (g) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

## (1) Impact Analysis

### *(a) Construction Impacts*

With respect to off-site emergency evacuation route impacts, the Project Site is not located on or near a City-designated selected disaster route.[5,6] Therefore, construction of the proposed Project would not cause any permanent alterations to evacuation routes and patterns or impede emergency access or travel on rights-of-way. Furthermore, all construction activities resulting in temporary alterations to public access and right-of-way would be subject to the LADBS and Los Angeles Department of Transportation (LADOT) permitting processes.

The Project Site is located at the terminus of Casitas Avenue, identified as a local street. Fletcher Drive is the closest identified disaster route to the Project Site.[7] Since the Project Site is not located on a major street or roadway, construction activities, which would add construction traffic to the street network, would have a minimal effect on fire protection services, such as emergency vehicle response times. These impacts are considered to be less than significant.

### *(b) Operational Impacts*

With respect to Project operation, the proposed Project would not interfere with emergency response or an evacuation plan. The Project Site is located at the terminus of Casitas Avenue, and would not interfere with or physically impede access to existing emergency evacuation routes in the project vicinity. Access for LAFD apparatus and personnel to and into all structures shall be required, and fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other turning area approved by the LAFD. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required. As discussed in Section II, Project Description, it is anticipated that approval of the proposed Project would be conditioned on providing an additional emergency secondary access/egress route to/from the Proposed Project Site. To comply with this anticipated condition, the Applicant would implement one of the following three options:

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[5] *Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008.*

[6] *City of Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

[7] *Ibid.*

- Option 1: An emergency access gate from the west side of the Project Site connecting to the existing service road on the east bank of the Los Angeles River Channel accessible via Fletcher Drive. This option would require obtaining permission from the LADWP;

- Option 2: An emergency access gate and driveway from the northbound onramp of SR-2, immediately north of an adjacent to the Project Site. This option would require approval from Caltrans; and

- Option 3: An emergency access gate on the south side of Casitas Avenue providing access through the future Bow Tie Park. This option would necessitate improving and paving an approximate 1.2-mile access road through a currently vacant site (which is planned for future parkland) and would require obtaining the permission of the State Parks Department.

Each of the three options described above are identified and delineated in Figure II-17 Secondary Emergency Access Options. The acquisition and maintenance of a secondary emergency access point would provide additional and improved emergency access to the Project Site and would facilitate a better response from the LAFD in the event of an emergency. Further, as discussed in detail in Section IV.I, Public Services of this Draft EIR, site plans must be submitted to the LAFD and the Los Angeles Police Department (LAPD) for their review and approval prior to the issuance of building permits. Emergency vehicle access to the Project Site would continue to be provided from local public roadways. ***Thus, the proposed Project would have a less-than-significant impact upon emergency response or evacuation plans.***

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Significance After Mitigation

Impacts associated with the impairment or physical interference with an existing emergency response plan or evacuation route would be less than significant without mitigation.

***Threshold (h) Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions?***

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study (Appendix A-1), the Project Site is not located in a Very High Fire Hazard Severity Zone. Thus, the Project would have no impact with respect to Threshold (h). No further analysis is required.

## e) Cumulative Impacts

### (1) Impact Analysis

Development of the proposed Project, in combination with the 17 related projects, has the potential to increase the risk for accidental release of hazardous materials. The 17 related projects are located within a 2-mile radius of the Project Site and occur within the City of Los Angeles and the City of Glendale. Each of the related projects would require evaluation for potential threats to public health and safety and the accidental release of hazardous materials into the environment during construction and operation, emergency response, transport, use, and disposal of hazardous materials, and hazards to sensitive receptors (including schools). Because hazardous materials and risk of upset conditions are largely site-specific, evaluation of potential threats to public safety would occur on a case-by-case basis for each individual project in conjunction with development proposals on these properties. The proposed Project's potential impacts associated with the accidental release of hazardous materials during construction and operation, the handling of hazardous materials near a school, and emergency response would be reduced to less-than-significant levels with the implementation of the regulatory compliance measures and HAZ-PDF-1. As such, the proposed Project would not combine with any of the related projects to cause a cumulatively significant impact. Further, each related project would be required to follow local, State and federal laws regarding hazardous materials and other hazards. ***Therefore, with compliance with local, State and federal laws pertaining to hazards and hazardous materials, cumulative impacts would be less than significant.***

### (2) Mitigation Measures

Cumulative impacts related to hazardous materials would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Cumulative impacts related to hazardous materials would be less than significant without mitigation.

# IV. Environmental Impact Analysis

# F. Land Use and Planning

## 1. Introduction

The following section evaluates the proposed Project's impacts relative to the physical compatibility of the proposed Project with the surrounding environment and the proposed Project's consistency with applicable land use regulations and policies adopted by the various governmental agencies that have jurisdictional oversight of the physical development and/or operational land uses and operational characteristics of the proposed Project.

The City of Los Angeles Department of City Planning has the primary responsibility of approving and overseeing development of the proposed Project. The following section includes a detailed analysis of the proposed Project's consistency with the existing land use and zoning regulations pursuant to the Los Angeles Municipal Code (LAMC) and the applicable elements and policies of the City of Los Angeles General Plan (General Plan) and the Northeast Los Angeles Community Plan (Community Plan). Further, the Project is located within the Cypress Park and Glassell Park Community Design Overlay (CDO) District and the River Improvement Overlay (RIO) District. This section also analyzes the proposed Project's consistency with applicable provisions regarding each overlay.

Regional planning agencies that have regulatory oversight of focused issues include the Southern California Association of Governments (SCAG), the South Coast Air Quality Management District (SCAQMD), the Regional Water Quality Control Board (RWQCB), and the Los Angeles County Metropolitan Transportation Authority (Metro). These regional agencies have limited authority over certain aspects of the proposed Project's construction activities and/or operation and are therefore identified as responsible agencies (if specific permits are required) or trustee agencies (in instances where no permits are required, but the agency has the regulatory oversight of a particular resource).

# 2. Environmental Setting

## a) Regulatory Framework

At the regional level, the Project Site is located within the planning area of SCAG, the region's federally-designated metropolitan planning organization (MPO). Therefore, the proposed Project is subject to SCAG's regional planning policies. The proposed Project is also located within the South Coast Air Basin (Basin) and, therefore, is within the jurisdiction of the SCAQMD and is subject to SCAQMD's Air Quality Management Plan (AQMP). The Project Site is located within the Los Angeles Watershed Basin and is subject to the regulatory oversight of the Los Angeles RWQCB. In addition, Metro is the Congestion Management Agency for Los Angeles County and is responsible for implementing the Congestion Management Plan (CMP).

At the local level, the Project Site is located in Council District 1 within the City of Los Angeles. Development of the Project Site is guided by the City of Los Angeles General Plan, which provides general guidance on land use issues and planning policies for the entire City, and the City of Los Angeles Planning and Zoning Code (Chapter 1, Articles 1-9 of the LAMC), which is intended to guide land use decisions and development patterns for individual properties. Within the City of Los Angeles, the Project Site is located within the Northeast Los Angeles Community Planning Area (CPA), the RIO District, and the Cypress Park and Glassell Park CDO District. The Project Site is located within 1,000 feet of the Glendale Freeway (SR-2) and is subject to the Freeway Adjacent Advisory Notice for Sensitive Uses (ZI-2427). Additionally, the Project Site is located within Metro Rail Project area (ZI-1117).

### (1) Southern California Association of Governments (SCAG)

SCAG is a federally designated MPO, representing six counties (Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles). SCAG is mandated by federal and State law to research and develop plans for transportation, growth management, hazardous waste management, and a regional growth forecast that is the foundation for these plans and regional air quality plans developed by the SCAQMD. SCAG divides its planning area into 15 subregions. The Project Site is located within the City of Los Angeles subregion.

As part of its regional planning efforts, SCAG prepared and has adopted the 2012 Regional Housing Needs Assessment (RHNA) and the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) to address regional growth and measure progress toward achieving regional planning goals and objectives.

*(a) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)*

In April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016-2040 RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016-2040 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals.

Based on the regional growth projections in the 2016-2040 RTP/SCS, in 2012, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons, approximately 1,325,500 residences, and 1,696,400 jobs.[1] By the year 2040, SCAG forecasts that the City of Los Angeles will increase to 4,609,400 persons (an approximate 20 percent increase from 2012) with approximately 1,690,300 residences (an approximate 28 percent increase from 2012) and approximately 2,169,100 jobs (an approximate 28 percent increase 2012).[2]

*(b) 2012 Regional Housing Needs Assessment*

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The 5th Cycle RHNA Allocation Plan, which covers the planning period from October 2013 to October 2021, was adopted by the Regional Council on October 4, 2012. The State of California Department of Housing and Community Development, Division of Housing Policy Development, approved SCAG's adopted RHNA Plan upon finding it consistent with the 2012-2035 RTP/SCS in that the Final RHNA was developed concurrently with SCAG's development of the Integrated Growth Forecast. The City of Los Angeles RHNA allocation represents one-fifth of the total SCAG RHNA.[3] (Refer to Section IV.H Population, Housing, and Employment for a more detailed description of the 2012 RHNA.)

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[1] *Southern California Association of Government, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, Demographics and Growth Forecast Appendix, adopted April 2016.*

[2] *Ibid.*

[3] *City of Los Angeles, Department of City Planning, Housing Element (2013-2021), adopted December 2013 (at page 1-79).*

### (2) Los Angeles County Congestion Management Plan

The CMP for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation and air quality decisions. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects, which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements) cities, counties, and other eligible agencies must implement the requirements of the CMP. Metro is the designated congestion management agency responsible for coordinating the County's adopted CMP. The proposed Project's Traffic Study was prepared in accordance with the County CMP and City of Los Angeles Department of Transportation (LADOT) Guidelines. Project traffic impacts are analyzed in greater detail in Section IV.K, Transportation and Traffic, of this Draft EIR.

### (3) City of Los Angeles General Plan

Whereas the LAMC is an overarching document that provides specific requirements and standards for all aspects of living, working, and city function (including development) within the City of Los Angeles, the General Plan is a comprehensive, long-range declaration of purposes, policies, and programs to guide future development and growth within the City. The General Plan is a dynamic document, which includes a Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Plan 2035, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 Community Plans that guide land use at the local level.[4] The Project Site is located within the boundaries of the Northeast Los Angeles CPA.

The General Plan Elements most applicable to the proposed Project are further discussed below.

#### *(a) Framework Element*

The Framework Element was adopted in December 1996 and readopted in August 2001. The Framework Element is a strategy for long-term growth which sets a citywide context to guide the update of the community plan and citywide elements. The Framework Element responds to State and federal mandates to plan for the future. In planning for the

[4] *City of Los Angeles, Department of City Planning, General Plan Elements, website: www.cityplanning.lacity.org, accessed August 2016.*

future, the City of Los Angeles is using population forecasts provided by the SCAG. The Framework Element does not mandate or encourage growth. Because population forecasts are estimates about the future and not an exact science, it is possible that population growth as estimated may not occur; it may be less or it may be more. The City could be at the beginning of a long decline in population or at the beginning of a sharp increase.

The Framework Element defines citywide policies that are implemented through subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. In many respects, the Framework Element provides fundamental guidance regarding the City's future. The City of Los Angeles is a city of cultural and natural diversity; its communities reflect a variety of people, while its environment reflects a variety of natural features ranging from mountains and hills to rivers, wetlands, and coastal areas. The Framework Element contains policies that are intended to maintain this diversity.

While the Framework Element incorporates a diagram that depicts the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, it does not convey or affect entitlements for any property. Specific land use designations are determined by the community plans. The Framework Element provides guidelines for future updates of the City's community plans. It does not supersede the more detailed community and specific plans.

The Framework Element defines citywide policies that influence most of the City's General Plan Elements. It includes seven general chapters with policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

1) Land Use: The primary objectives of the policies in the Land Use Chapter are to support the viability of the City's residential neighborhoods and commercial districts, and, when growth occurs, to encourage sustainable growth in a number of higher-intensity commercial and mixed-use districts, centers and boulevards, and industrial districts, particularly in proximity to transportation corridors and transit stations.

2) Housing: The Housing Chapter elaborates on the City's adopted Housing Element to ensure the provision of housing for the City's existing and future residents. A key policy it to provide sufficient lands for the development of an adequate supply of housing units. The Housing Chapter proposes the expansion of the City's capacity for housing units by the provision of bonus densities for the integration of housing with commercial uses in districts, centers, and boulevards.

3) Urban Form and Neighborhood Design: The Urban Form and Neighborhood Design Chapter defines "urban form" as (a) the "general pattern of building height and development intensity" and (b) the "structural elements" that define the City physically, such as natural features, transportation corridors (including the planned fixed rail transit system), open space, public facilities, as well as activity centers and focal elements. The chapter describes options to improve community and neighborhood liveability.

4) Open Space and Conservation: The Open Space and Conservation Chapter's open space and conservation objectives are oriented around the conservation of significant resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character.

5) Economic Development: The Economic Development Chapter's economic development policies are designed to facilitate job growth by emphasizing that Los Angeles plays a proactive role in the retention and attraction of businesses in order to have a sufficient job base to maintain and enhance the quality of life. These policies were not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the analysis of these policies is for informational purposes only, and any potential inconsistency with these policies would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).)

6) Transportation: The primary goals of the Transportation Chapter are to provide adequate accessibility to commerce, to work opportunities, and to essential services, and to maintain acceptable levels of mobility of all those who live, work, travel, or move goods in Los Angeles. Attainment of this goal necessitates a comprehensive program of physical infrastructure improvements, traffic systems management techniques, and behavioral changes that reduce vehicle trips. These are linked to an integrated hierarchy of movement modes that encompass the pedestrian, bicycle, automobile, local shuttle, bus, and rail transit.

7) Infrastructure and Public Services: The goals, objectives, and policies found within the Infrastructure and Public Services Chapter address wastewater, stormwater, water, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest.

*(b) 2013-2021 Housing Element*

The City of Los Angeles 2013-2021 Housing Element was adopted in December 2013 and updates the previous 2006-2014 Housing Element. The purpose of the Housing

Element is to meet the housing needs of the City's growing population, which includes not only more units, but also a broader array of housing types and price points. The Housing Element provides the foundation for residential development within the City of Los Angeles by providing goals, objectives, policies and programs to develop in a sustainable way that respects the collection of unique neighborhoods, ensures a high quality of life of all residents, ensures a vibrant economy and accessibility to jobs, open space, and urban amenities. The Housing Element directs growth to transit-rich and job-rich centers and supporting the growth with smart, sustainable infill development and infrastructure investments.

*(c) Air Quality Element*

The Air Quality Element of the City's General Plan was adopted on November 24, 1992 and sets forth the goals, objectives and policies that guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges that numerous efforts are underway at the regional, county, and City levels addressing clean air concerns and that coordination of these various efforts and the involvement of the area's residents are crucial to the achievement of state and federal air quality standards. The Air Quality Element recognizes that air quality strategies must be integrated into land use and transportation decisions.

The Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City utilizes the SCAQMD CEQA Air Quality Handbook as its guidance document for the environmental review of plans and development proposals within its jurisdiction. The proposed Project's consistency with the Air Quality Element is discussed in greater detail in Section IV.B, Air Quality, of this Draft EIR.

*(d) Conservation Element*

The Conservation Element of the City of Los Angeles General Plan, adopted March 10, 2001, addresses the conservation and preservation of natural resources within the City. Chapter II of the Conservation Element addresses resource conservation and management and contains several goals, objectives, and policies that may be pertinent to the proposed Project. Analysis of the proposed Project's compatibility and consistency with the Conservation Element occurs under the "Project Impacts" subheading below. Key goals, objectives, and policies of the Conservation Element include:

- A city that preserves, protects, and enhances its existing natural and related resources;
- Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes;
- Continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities; and
- Continue to require evaluation, avoidance, and minimization of potential significant impacts, as well as mitigation of unavoidable significant impacts on sensitive animal and plant species and their habitats and habitat corridors relative to land development.

*(e) Safety Element*

The Safety Element of the City of Los Angeles General Plan, adopted November 26, 1996, contains goals, objectives, and policies, which are designed to guide the functioning of the Emergency Operations Organization (EOO), which is the only program that implements the Safety Element. The purpose of the Safety Element is to provide a plan for responding to natural disasters and for reducing the initial risks associated with natural disasters. The Safety Element has three main goals, which guide its policies. The Safety Element establishes three goals:

- A city where potential injury, loss of life, property damage and disruption of the social and economic life of the City due to fire, water hazard, seismic event, geologic conditions, or release of hazardous materials disasters is minimized;
- A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage, and disruption of the social and economic life of the City and its immediate environs; and
- A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.

The City's Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster and initial recovery from a natural disaster. The Safety Element outlines the historic evolution in Los Angeles of local, state, and federal roles, particularly relative to mitigation of and response to natural disasters. The Safety Element emphasizes seismic safety issues because seismic events present the most widespread threat of devastation to life and property. The City adopted a series of ordinances which required retrofitting of certain existing structures and for new construction, as well as an ordinance which required evaluation of structures by a structural engineer during the construction process. Analysis of the proposed Project's compatibility and consistency with the Safety Element occurs under the "Project Impacts" subheading below.

*(f) Mobility Plan 2035*

The Mobility Plan 2035 of the City of Los Angeles General Plan (Mobility Plan 2035), amendment adopted January 20, 2016, is designed to provide a policy foundation for the transportation system within the City of Los Angeles. The Mobility Plan 2035 identifies five key goals that define the City's high-level mobility priorities. These key goals are further discussed below:

- Safety First: Crashes, speed, protection, security, safety education, and enforcement.
- World Class Infrastructure: Design, Complete Street Network (walking, bicycling, transit, vehicles, and good movement), bridges, highways, and smart investments.
- Access for All Angelenos: Affordability, vulnerable users, land use, operations, reliability, demand management, and community connection.
- Collaboration, Communication, and Informed Choices: Real-time information, open-source data, transparency, monitoring, reporting, departmental and agency

cooperation, database management, parking options, loading and unloading, and goods movement.

- Clean Environments and Healthy Communities: Environment, public health, clean air, and clean fuels and fleets.

*(g) Noise Element*

The Noise Element of the City of Los Angeles General Plan, adopted February 3, 1999, is designed to manage noise within the City and to protect sensitive uses from excessive noise-related impacts. Community Noise Exposure Guidelines for Los Angeles are addressed in Section IV.G, Noise, of this Draft EIR. Noise-sensitive uses include residential dwellings, medical care facilities, hotels, houses of worship, parks, and schools, amongst others. The primary goal of the Noise Element is to maintain a city where noise does not reduce the quality of urban life. The Noise Element also contains several objectives and policies on noise management, which are pertinent to the proposed Project. These objectives and policies are identified below:

- Reduce or eliminate noise impacts associated with the proposed development of land and changes in land use;

- Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts; and

- For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, as defined by the Noise Element, require mitigation measures, as appropriate, in accordance with CEQA and city procedures.

A complete analysis of the noise impacts of the proposed Project is contained in Section IV.G, Noise, of this Draft EIR. Analysis of the proposed Project's compatibility and consistency with the Noise Element occurs under the "Project Impacts" subheading below.

*(h) Northeast Los Angeles Community Plan (Land Use Element)*

The General Plan is comprised of 35 separate CPAs, each of which is governed by its own Community Plan that is intended to implement the policies of the General Plan Framework at the community levels. The Community Plans are intended to promote an arrangement of land uses, streets, and services, which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the people who live and work in the community.

The Project Site is located within the Northeast Los Angeles CPA. The CPA comprises roughly 15,000 acres and is occupied by residents living in a diverse collection of communities and neighborhoods. The CPA was greatly influenced by the development of the freeway system, suburbanization, and the decentralization of commercial and industrial land uses that followed WWII. This caused the arrangement of land uses within the CPA to change, and the relationship of the CPA with the rest of the expanding metropolis. The Northeast Los Angeles Community Plan, which was last revised in June 1999, aims to preserve and enhance the character of Northeast Los Angeles by strengthening the viability and identity of its neighborhoods and communities and improving the quality of life of all its residents.[5]

Nine neighborhoods comprise the Northeast Los Angeles CPA, which include Atwater Village, Cypress Park, Eagle Rock, El Sereno, Glassell Park, Highland Park, Lincoln Heights and Montecito Heights, Monterey Hills, and Mount Washington. The Project Site is located within the Atwater Village neighborhood. Atwater Village is the most isolated portion of Northeast Los Angeles with respect to the rest of the CPA. Atwater Village occupies a narrow strip of level land between two major barriers, the Los Angeles River on the west and the railroad tracks on the east. The neighborhood is served by a single north-south artery, San Fernando Road, which lies immediately to the east of the railway. Major east-west arteries include Colorado Boulevard, Fletcher Drive, Los Feliz Boulevard, and Glendale Boulevard. Atwater Village is generally comprised of residential, commercial, and industrial land uses.[6]

The Community Plan goals and objectives includes preserving and enhancing the positive characteristic of existing residential neighborhoods while providing a variety of compatible new housing opportunities; improving the function, design, and economic vitality of the commercial districts; preserving and enhancing the positive characteristics of existing uses and ensuring that future developments improve the identity and appearance of neighborhoods and communities by providing guidance regarding scale, height, bulk, setbacks, design, and landscaping; regulating the development opportunities associated with the future rail transit system to maximize the economic potential while minimizing any adverse impacts; and revitalizing commercial and industrial development sites with needed job producing uses that improve the economic and physical condition of the Northeast Los Angeles CPA. As shown in Figure IV.F-1, Land Use Designations for the Project Site and Vicinity, the Northeast Los Angeles CPA's land use plan designates the Project Site for Heavy Manufacturing land uses.

[5] *City of Los Angeles Department of City Planning, Northeast Los Angeles Community Plan, June 15, 1999.*

[6] *Ibid.*

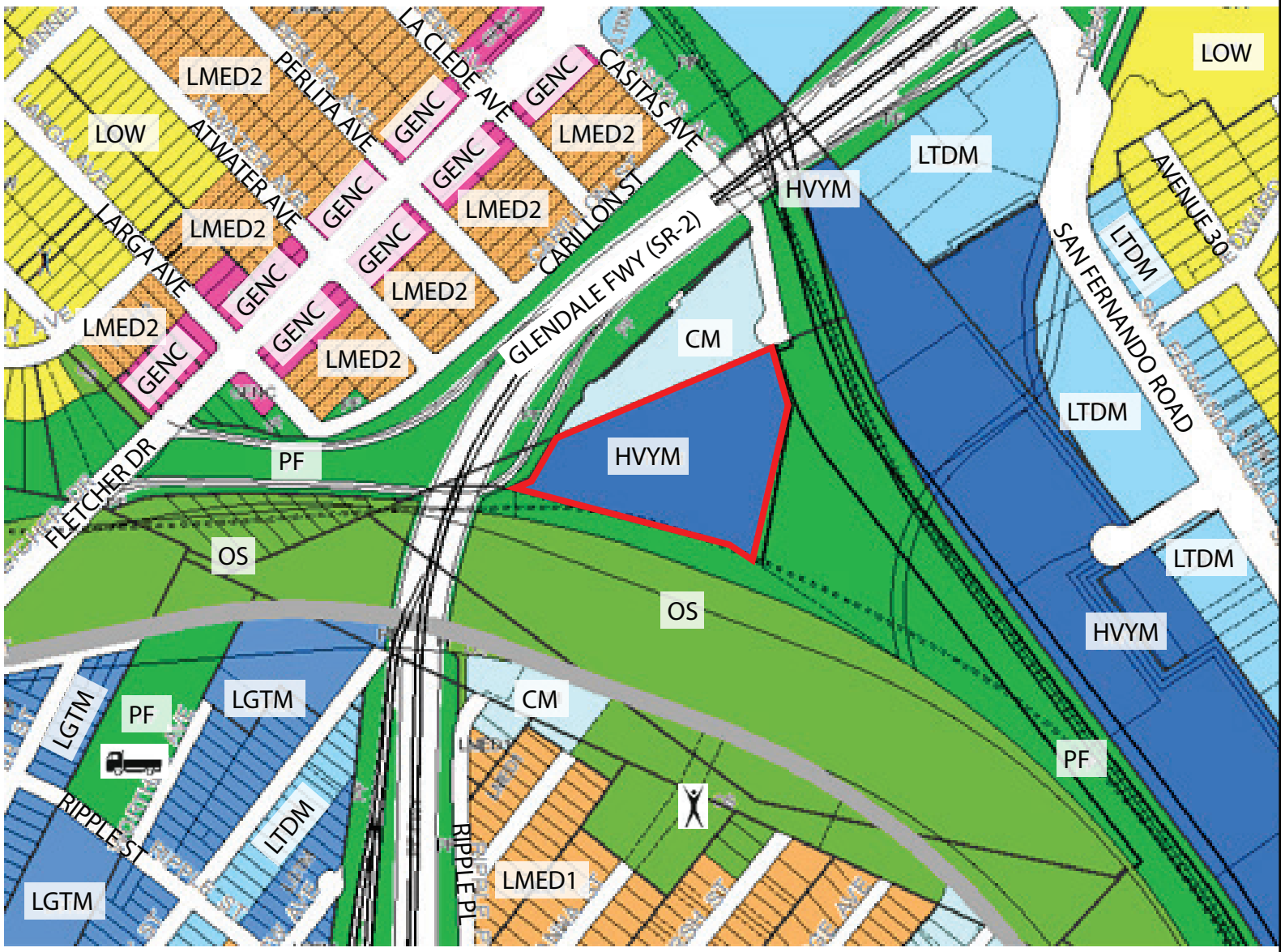
### (4) Cypress Park and Glassell Park Design Overlay

The Cypress Park and Glassell Park CDO District encompasses the area roughly bound by the City of Glendale to the north, the Los Angeles River to the west, the Pasadena Freeway to the south, and Mount Washington hillside area and York Boulevard to the east. The CDO District, effectuated by Ordinance No. 180,561 in April 2009, provides guidelines and standards for public and private development projects within the CDO District. The intent of the CDO is to provide guidance and direction in the design of new buildings and the exterior remodeling and restoration of existing homes, buildings and storefronts that contribute to the area's revival as an attractive and vital business district and walkable and desirable residential neighborhood. In addition, the CDO aims to protect the culturally and historically significant resources in the area. The CDO Design Guidelines exist as a framework for development in the CDO District, and development standards set forth requirements that bring about compliance with portions of the design guidelines. The CDO Design Guidelines address site planning, building design, architectural features, landscaping, signs, and mechanical equipment for commercial, residential, and industrial projects. The CDO Design Guidelines state that whenever the provisions of the CDO are in conflict with the provisions of the RIO, those plans will supersede the CDO. However, projects will still require review for compliance with the CDO for those provisions not addressed within the RIO. Further, the CDO Design Guidelines state that wherever provisions of the CDO conflict with provisions of the LAMC and any ordinance therein, the LAMC will supersede the CDO unless an ordinance, such as a qualifying condition, has been adopted to support the provision of the CDO (e.g., the [Q] condition on the Project Site).[7]

### (5) River Improvement Overlay

Effectuated by Ordinance No. 183,145 in August 2014,[8] the River Improvement Overlay (RIO) District enables the City of Los Angeles to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City's boundaries. The RIO District is a proposed special use district that requires new development projects to follow and implement applicable development regulations and design guidelines. The purpose of the RIO District is to support the goals of the Los Angeles River Revitalization Master Plan (LARRMP)[9]; contribute to the environmental and ecological health of the City's watersheds; provide native habitat and support local species; establish a positive

[7] *City of Los Angeles Department of City Planning, Cypress Park & Glassell Park Community Design Guidelines: Design Guidelines and Development Standards, April 6, 2009.*
[8] *City of Los Angeles, Ordinance No. 183,145, Effective August 20, 2014.*
[9] *City of Los Angeles, Los Angeles River Master Plan, April 2007.*




Source: ZIMAS, City of Los Angeles, Department of City Planning, 2016.

Figure IV.F-1
Land Use Designations for the Project Site and Vicinity

interface between the Los Angeles River and adjacent properties; promote pedestrian, bicycle and other multi-modal connections between the river and surrounding neighborhoods; provide an aesthetically pleasing environment; provide safe, convenient access to and along the river; promote river identity; and support the City's stormwater ordinances and programs.

The RIO Ordinance helps implement the LARRMP, which was passed in April 2007. The LARRMP sets forth a 20-year blueprint for revitalization of the Los Angeles River and its surrounding communities in an effort to achieve the following broad goals established by the Ad Hoc River Committee:

- Establish environmentally sensitive urban design guidelines, land use guidelines, and development guidelines for the Los Angeles River zone that will create economic development opportunities to enhance and improve Los Angeles River-adjacent communities by providing open space, housing, retail spaces such as restaurants and cafes, educational facilities, and places for other public institutions.
- Improve the environment, enhance water quality, improve water resources, and improve the ecological functioning of the Los Angeles River.
- Provide public access to the Los Angeles River.
- Provide significant recreation space and open space, new trails, and improve natural habitats to support wildlife.
- Preserve and enhance the flood control features of the Los Angeles River.
- Foster a growth in community awareness of the Los Angeles River and pride in the Los Angeles River.

The RIO Ordinance supports the LARRMP by promoting sustainable building practices and providing design guidelines. The RIO Ordinance establishes development regulations that address landscaping, screening/fencing, and exterior site lighting. Additional regulations pertaining to landscape buffers, fencing and fence heights, gates, noise, and river access also apply to properties within the inner core, which comprises of properties adjacent to the Los Angeles River, including the Project Site. The RIO Ordinance additionally establishes a process for the City Planning Commission to adopt the River Design Guidelines. Currently, the River Design Guidelines are in draft form and have not been formally adopted.

### (6) Los Angeles Municipal Code and Zoning/Land Use Category

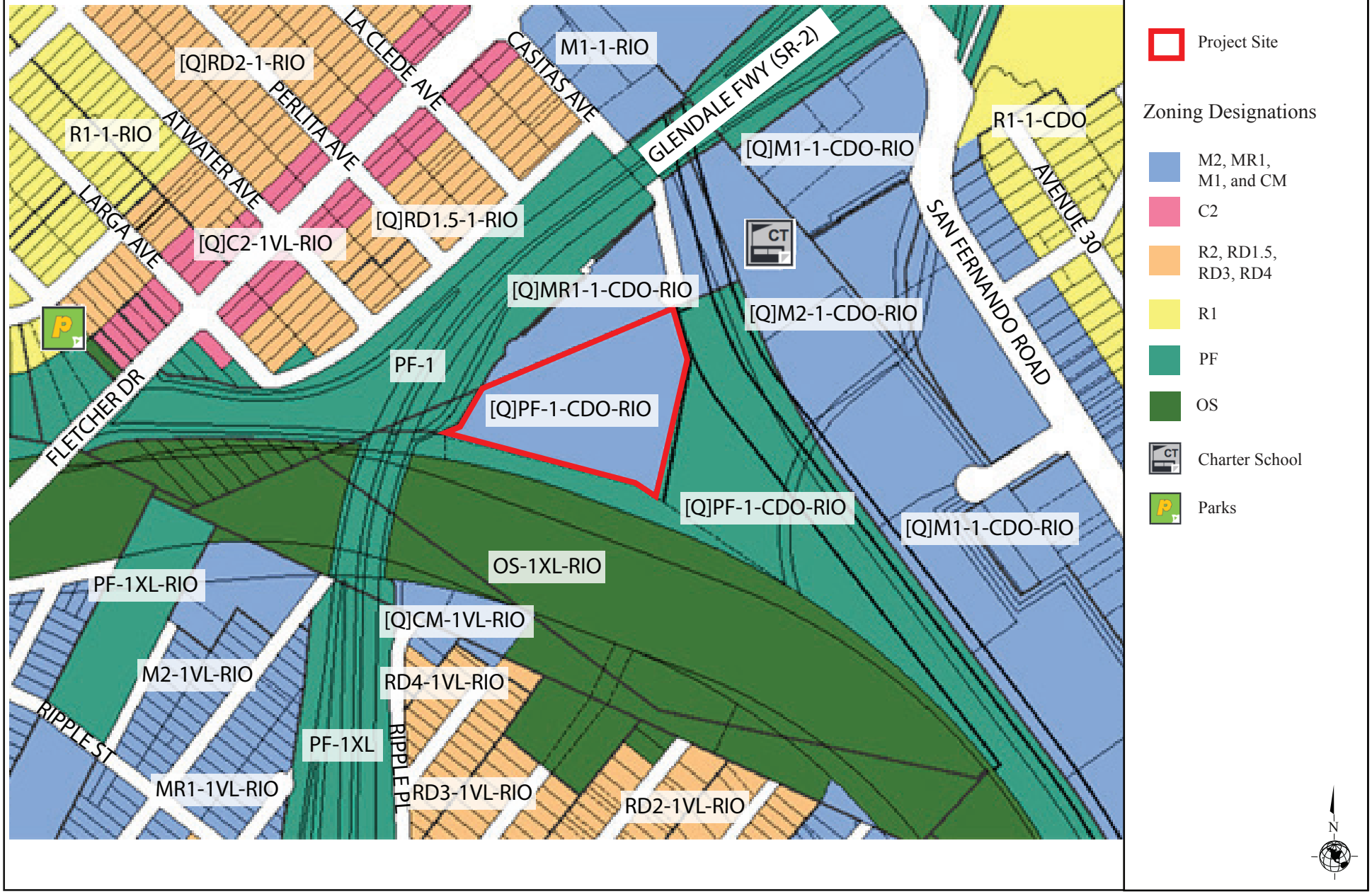
The LAMC assists City offices, departments, and other governmental agencies in their functions and serves as the official source of information regarding the regulations enacted by the City of Los Angeles for the preservation of the public peace, health, and safety. As the LAMC pertains to development, the LAMC sets specific requirements and standards for development projects within the City of Los Angeles, such as zoning laws, construction standards, open space, and parking requirements. The LAMC is amended by ordinances and is enforced by the City of Los Angeles.

The LAMC sets the zoning designations for the Project Site and the surrounding area. As shown in Figure IV.F-2, the Project Site is zoned as [Q]PF-1-CDO-RIO.[10] In 2010, the City inadvertently rezoned the Project Site from M2-1 to its current zoning, which is not consistent with the Project Site's Heavy Manufacturing land use designation under the Community Plan. The "PF" zoning is associated with a land use designation of Public Facilities. Zoning on-site allows for the development of agricultural uses, parking under freeways, fire and police stations, government buildings, public libraries, post offices, public health facilities, and public elementary and secondary schools. The Project Site is located within Height District No. 1, which allows a maximum FAR of 1.5:1. The "CDO" designation indicates that the Project Site is located within the Cypress Park and Glassell Park CDO District. The "RIO" indicates that the Project Site is located within the River Improvement Overlay District. The Cypress Park and Glassell Park CDO also placed a zone change and a [Q] condition on the Project Site. The [Q] condition generally prohibits the following land uses: automobile-related establishments; drive-through establishments (including, but not limited to, fast food, coffee, drug stores and banks), commercial shipping, electronic message display signs, lumber stores or lumber yard in excess of 20,000 square feet of lot area, new public storage facilities, pole and pylon signs, equine or motorcycle sales, and recreational vehicle parks. Pursuant to LAMC Section 13.08, the proposed Project is seeking a Design Overlay Plan Approval to ensure compliance with the CDO.

#### *(a) Clean Up Green Up Ordinance (Ordinance 184,245)*

As part of its Clean UP Green UP campaign, the City Council adopted Ordinance 184,245 (effective June 2016) adding Sections 95.314.3 and 99.04.504.6 to the LAMC and amending Section 99.05.504.5.3 of the LAMC to implement building standards and

[10] *City of Los Angeles Department of City Planning, Cypress Park & Glassell Park [Q] Conditions CPC-2008-3991-ZC, 2009.*




Source: ZIMAS, City of Los Angeles, Department of City Planning, 2016.

Figure IV.F-2
Zoning Designations for the Project Site and Vicinity

requirements to address cumulative health impacts resulting from incompatible land use patterns within the City. Section 99.04.504.6 of the LAMC requires mechanically ventilated buildings within 1,000 feet of a freeway to provide regularly occupied areas of the building with air filtration media for outside and return that provides a Minimum Efficiency Reporting Value (MERV) of 13.

### (7) Zoning Information (ZI)

#### *(a) East Los Angeles Enterprise Zone / Employment and Economic Incentive Program Area (ZI No. 2129)*

ZI No. 2129 sets additional provisions for parking and height. Projects within enterprise zones (except for the Downtown Business District) may utilize lower parking ratios for certain commercial uses. Additionally, ZI No. 2129 establishes special height districts, which increases the total floor area contained in all buildings on a lot to three times the buildable area.

#### *(b) Metro Rail Project Area (ZI No. 1117)*

Prior to the issuance of any building permit within 100 feet of the Metro Rail construction area, a construction project must obtain clearance from Metro. Examples of construction activities that require Metro review include delivery of concrete or materials, erection of exterior scaffolding, demolition, borings, tunneling, seismic retrofitting and excavations, new structures, and additions to existing structures.

#### *(c) Freeway Adjacent Advisory Notice for Sensitive Uses (ZI No. 2427)*

ZI No. 2427 requires that all new projects and expansions of existing developments involving sensitive uses within 1,000 feet of a freeway be notified of public health implications of freeway-adjacent projects. Sensitive receptors typically include residences, schools, playgrounds and childcare centers, long-term health care facilities, rehabilitation centers, adult day care / convalescent centers, hospitals, and retirement homes. The Project Site is located within 1,000 feet of SR-2, which is located to the west and north of the Project Site.

### (8) Residential Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the 10 Urban Design Principles, a part of the Framework Element. These principles are a statement of the City's vision for the future of Los Angeles, providing guidance for new development and encouraging projects to complement existing urban form in order to enhance the built environment in Los Angeles. While called "urban", the Urban Design Principles reflect citywide values to

be expressed in the built environment of the City, establishing a design program for the City. They are intended to embrace the variety of urban forms that exist within Los Angeles, from the most urban, concentrated centers to our suburban neighborhoods.

The Citywide Design Guidelines supplement the Citywide Urban Design Principles. By offering more direction for proceeding with the design of a project, the Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. It is important to remember, though, that they are performance goals, not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC.

#### (9) Walkability Checklist

The purpose of the Walkability Checklist for Entitlement Review is to guide City of Los Angeles Department of City Planning staff, as well as developers, architects, engineers, and all community members, in creating enhanced pedestrian movement, access, comfort, and safety– contributing to the walkability of the City. The Walkability Checklist encourages pursuit of high quality City form, including urban, suburban, and rural areas. It informs stakeholders about the tools and techniques that improve curb appeal, beauty, and usability through a location-specific approach. Placemaking - the act of designing buildings to make them more attractive to and compatible with the people who use them, is the primary design principle in creating walkable neighborhoods.

The Walkability Checklist provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. Each of the implementation strategies on the Walkability Checklist should be considered in a proposed project, although not all will be appropriate in every proposed project. Each project will require a unique approach. While the Walkability Checklist is neither a requirement nor part of the zoning code, it provides a guide for consistency relating with the policies contained in the General Plan Framework. Incorporating these guidelines into a project's design will encourage pedestrian activity, more appropriate forms, and placemaking. A project that is walkable is good for business and the environment.

## b) Existing Conditions

#### (1) Project Site

The Project Site includes one parcel covering approximately 248,190 gross square feet (approximately 5.7 acres) of land within the Northeast Los Angeles CPA in the City of Los Angeles. The Project Site is located within the Cypress Park and Glassell Park CDO District and within the RIO District. Vehicle access to the Project Site is provided from

Casitas Avenue. Refer to Figure II-4, Proposed Plot Plan, presented in Section II, Project Description.

The Cypress Park and Glassell Park CDO District sets specific development standards for the area. The Project Site is currently developed with a light manufacturing facility (approximately 117,000 square feet) and its associated surface parking lot. Landscaping is provided throughout the surface parking lot, at the site entrance, and along the perimeter of the Project Site. One ingress/egress driveway is provided for access to the Project Site from Casitas Avenue. Photographs depicting the existing conditions of the land uses on the Project Site are provided in Figures IV.A-2 and IV.A-3 in Section IV.A, Aesthetics.

### (2) Surrounding Land Uses

The properties surrounding the Project Site have General Plan land use designations of Commercial Manufacturing, Open Space, and Public Facilities. SR-2 is located to the west of the Project Site. The Los Angeles River is located to the south of the Project Site. A railway is located to the northeast of the Project Site. These three features limit access to the Project Site via Casitas Avenue from the surrounding neighborhood. Photographs of the land uses immediately surrounding the Project Site are provided in Figure IV.A-4 and Figure IV.A-5, located in the Section IV.A, Aesthetics. Detailed descriptions of the surrounding land uses are provided below.

North: The Project Site is immediately bordered by a self-storage facility to the north (refer to Figure IV.A-4, Views 11 and 12). This property is zoned [Q]MR1-1-CDO-RIO and has a land use designation of Commercial Manufacturing. Access to the self-storage facility and the Project Site is limited to Casitas Avenue. Figure IV.A-1, shows the Project Site and the self-storage facility are surrounded by open space (OS) and public facilities (PF) land uses, including SR-2, the Los Angeles River, and the railway right of way (r-o-w). SR-2 runs in a north-south direction in the vicinity of the Project Site and is located just northwest of the self-storage facility and the Project Site, where it curves around these properties, as shown in Figure IV.A-1, Aerial Photograph of the Project Site. SR-2 is located at a higher elevation than the Project Site and surrounding properties. Commercial and residential land uses are located further north of SR-2, as shown in Figure IV.A-4, View 9.

West: Vegetation is located immediately to the west of the Project Site along the property fence to separate the Project Site and SR-2. An on-ramp to SR-2 is located further west of the vegetation. Commercial and residential land uses are located further west of the Project Site on the other side of SR-2. Refer to Figure IV.A-4, View 9, Figure IV.A-5, View 16.

South: The Los Angeles River, which runs in an east-west direction in the vicinity of the Project Site, immediately borders the Project Site to the south. Industrial and residential uses exist south of the Los Angeles River. An LADWP-owned easement improved with a paved maintenance road and electricity transmission towers runs between the Project Site and the Los Angeles River south of the property fence. This road is also utilized as a pedestrian walkway and is connected to the residential neighborhood to the west of the Project Site and SR-2. Refer to Figure IV.A-5, View 14 and View 15.

East: Vacant land zoned for public facilities is located to the east of the Project Site. California State Parks owns this vacant land, which was previously a part of the Taylor Yard.[11] This vacant area is slated for development of a public park with naturalized open space. California State Parks and the Clockshop, an arts organization, work together on the Bowtie Project, which is a collaboration of artwork and performances and currently operates on this vacant area. A public facilities road branches off of Casitas Avenue and continues eastward from the Project Site area. A railway is also located east of the Project Site and runs in a northwest-southeast direction in the vicinity of the Project Site. Commercial and institutional land uses are located further east of the railway. Refer to Figure IV.A-5, Views 13.

# 3. Project Impacts

## a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project may have a significant environmental impact if it were to:

***Threshold (a) Physically divide an established community; or***

***Threshold (b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate Land Use and Planning:

[11] *Taylor Yard is a 242-acre former rail yard site located on the Los Angeles River, just north of Elysian Park and the I-5/Arroyo Seco Parkway intersection. Website: https://www.metro.net/projects/jd-taylor-yard/, accessed August 2018.*

*(i) Land Use Consistency*

- *Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site;*

- *Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans;*

*(ii) Land Use Compatibility*

- *The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area; and*

- *The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and*

- *The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project.*

## b) Methodology

The analysis of potential land use impacts considers the proposed Project's consistency and conflicts with applicable plans, policies, and regulations that regulate land use on the Project Site, except for those plans analyzed in other impact sections. To the extent that the Projects' potential conflict with a plan, program or policy is analyzed in another section of the EIR (e.g. Air Quality Management Plan in the Air Quality chapter), that plan is not further discussed in this chapter.

For purposes of plan consistency, the following analysis addresses regional and local plans, policies, and regulations that regulate uses on the Project Site, including SCAG's SCAG's 2016-2040 RTP/SCS, SCAQMD's AQMP, the City of Los Angeles General Plan (including the City of Los Angeles Framework Element, Air Quality Element, Safety Element, Noise Element, and Housing Element), Mobility Plan 2035, the Northeast Los Angeles Community Plan, and the applicable provisions of the LAMC that were specifically adopted for the purpose of avoiding or mitigating an environmental effect. The following analysis also includes, for informational purposes, a discussion of the proposed Project's consistency with certain goals, objectives, and policies of the General Plan Framework Element and the Community Plan pertaining to industrial preservation and conversion.

State CEQA Guidelines Section 15125(d) requires that in describing the environmental setting, an EIR discuss any inconsistencies between the proposed project and applicable

general plans, specific plans, and regional plans. Separately, Appendix G recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation *adopted for the purpose of avoiding or mitigating an environmental effect*.

Importantly, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2 "an EIR shall identify and focus on the significant effects of the proposed project on the environment."

A project does not need to be in perfect conformity with each and every policy.[12] More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> …if a project affects a river corridor, one standard for determining whether the impact is *significant* might be whether the project violates plan policies protecting the corridor; the environmental *impact*, however, is the physical impact on the river corridor.

Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one of more policies and does not obstruct other policies.

## c) Project Design Features

No specific project design features are proposed with regard to land use beyond the building plans and site improvements discussed in Section II, Project Description, of this Draft EIR.

## d) Analysis of Project Impacts

***Threshold (a) Would the project physically divide an established community?***

[12] *Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.*

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study (Appendix A of this Draft EIR), the proposed Project would not physically divide an established community. Development of the proposed Project would be limited to the Project Site; as such, no impact related to Threshold (a) would occur. No further analysis of this issue is required.

***Threshold (b) Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?***

## (1) Impact Analysis

### *(a) Consistency with Local Land Use Plans, Policies, and Zoning*

#### *(i) City of Los Angeles General Plan*

Framework Element

The General Plan Framework Element provides a general outline to guide the goals, objectives, and policies of the other elements of the General Plan. The proposed Project would promote the general goals of the Framework Element. The proposed Project supports the Framework Element's housing objectives by increasing the housing supply and diversity within the City of Los Angeles to help meet the housing needs of City residents, by providing new market rate housing in different configurations and reserving 35 dwelling units as Very Low Income housing. The proposed Project includes a mixed-use development that would place residences near job opportunities; entertainment, such as the Los Angeles Zoo and Dodger Stadium; cultural opportunities, such as the future Bowtie Park Project and the Gene Autry Heritage Museum; and community supporting services, such as churches, fire stations, schools, and hospitals. The proposed Project's consistency with the applicable goals, objectives, and policies of the General Plan Framework Element's chapters adopted for the purpose of avoiding or mitigating an environmental effect is analyzed in Table IV.F-1, below. The below table also analyzes, for informational purposes, the Project's consistency with certain economic development goals, objectives, or policies. As these economic development goals, objectives, and policies were not adopted for the purpose of avoiding or mitigating an environmental effect, any potential inconsistency therewith would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).)

The proposed Project would generally conform to the goals, objectives, and policies identified in the Framework Element and other elements of the General Plan, further discussed below.

**Table IV.F-1**
**City of Los Angeles General Plan Framework Element Consistency Analysis**

| Framework Element Goals, Objectives, and Policies | Project Consistency Analysis |
|---|---|
| ***Land Use Chapter*** | |
| **Objective 3.1:** Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors. | **No Conflict.** As discussed above, the proposed Project would include a variety of uses, including multi-family residential and commercial space, which would provide new opportunities for new businesses or the expansion or relocation of existing businesses to support the needs of the City's existing and future residents and businesses. |
| **Objective 3.2:** Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution. | **No Conflict.** The proposed Project would include a mix of land uses including residential and commercial that would provide residents the opportunity to live and work in the City. The mixed-use nature of the proposed Project would allow for residents of the proposed Project and adjacent neighborhoods to the north of SR-2 to access restaurants on-site via the internal pedestrian corridors without driving. The proposed Project would also provide direct bicycle and pedestrian access to the proposed Bowtie Park Project to the south. Thus, this would reduce vehicles miles traveled (VMT), promote alternatives to driving, and would reduce vehicle emissions and improve air quality. |
| **Policy 3.2.3:** Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations. | **No Conflict.** The proposed Project would encourage improved access and mobility by providing both residential and commercial uses on a single site. The on-site commercial uses would provide employment and patronage opportunities within walking distance of on-site residents and the nearby multi-family residential developments.<br><br>In addition, the proposed Project would provide direct bicycle and pedestrian access to the Los Angeles River corridor, which may be linked to a larger network of paths and pedestrian linkages as proposed under the LA River Revitalization Master Plan. Consistent with the LA River Revitalization Master Plan, the proposed Project would promote residential and neighborhood- serving commercial land uses with pedestrian accessibility along the LA River corridor. The proposed Project would also open the Project Site to pedestrian access between the Los Angeles River and Casitas Avenue and increase connectivity of the Project area. The location of the proposed Project promotes the use of a variety of transportation options, which includes walking, biking, |

| Framework Element Goals, Objectives, and Policies | Project Consistency Analysis |
|---|---|
| | and the use of public transportation. |
| **Policy 3.2.4:** Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts. | **No Conflict.** The proposed Project would be well-designed and landscaped in accordance with applicable design guidelines. These guidelines and standards are in place to ensure that projects are designed and developed to achieve a high level of quality, have a distinctive character, and are compatible with existing residential and commercial uses and development. The Proposed Project would replace an existing manufacturing/ warehouse/ production facility with a new and modern mixed-use development with residential and neighborhood-serving commercial uses. The Project Site is visually isolated from the residential neighborhood north of SR-2 and thus would not impact the prevailing character of an existing neighborhood. Therefore, the proposed Project would be consistent with this policy. |
| **Goal 3C:** Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents. | **No Conflict.** The proposed Project would include multi-family residential units with on-site neighborhood-serving commercial uses with on-site amenities and common open space areas. The proposed Project would provide an attractive and quality environment for the proposed Project's future residents. Thus, the proposed Project would be consistent with this goal. |
| **Objective 3.7:** Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved. | **No Conflict.** The proposed Project would redevelop a site that is currently occupied by light industrial uses. The proposed Project would be attractively designed and landscaped in accordance with the applicable design guides, which are further discussed below. Compliance with regulatory requirements relating to aesthetics (as discussed in Section IV.A, Aesthetics) would further ensure that the building maintains a safe, clean, and attractive environment during the Project's construction and operation.<br><br>Additionally, as discussed in Section IV.I, Public Services, and Section IV.J, Public Utilities, the proposed Project would not create a significant negative impact that cannot be mitigated to a less-than-significant level for all public services, utilities, and service systems. Therefore, the Project would support utility infrastructure and public services. |
| **Policy 3.8.4:** Enhance pedestrian activity by the design and siting of structures in accordance with Chapter 5 Urban Form and Neighborhood Design policies of this Element and Pedestrian-Oriented District Policies. | **No Conflict.** The proposed Project is not within a Pedestrian Oriented District Overlay but is located within the River Improvement Overlay District which was established with the intended purpose of supporting the goals of the LA River Revitalization Master Plan and promoting pedestrian, bicycle, and other multi-modal connection between the river and its surrounding |

| Framework Element Goals, Objectives, and Policies | Project Consistency Analysis |
|---|---|
| | neighborhoods. As discussed above, the proposed Project would provide residential and commercial restaurant land uses on-site with accessibility to the LA River corridor. The proposed Project would be attractively designed and landscaped in accordance with the applicable design guidelines. The design and location of the proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. For example, in addition to serving the needs of the on-site residents, the proposed restaurant uses would be accessible to people biking and walking along the LA River corridor and future Bowtie Park open space areas to the south. |
| **Objective 3.10:** Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles. | **No Conflict.** The proposed Project is not a regional center but it would provide commercial uses, including restaurant, creative office, and an urban farm that would serve and provide future and existing residents with job opportunities. Additionally, the proposed Project would be compatible with the character of the surrounding residential neighborhoods, incorporating multi-family residential land uses and neighborhood serving commercial land uses that would enhance the urban lifestyle within the community. |
| **Policy 3.14.6:** Consider the potential re-designation of marginal industrial lands for alternative uses by amending the community plans based on the following criteria:<br>a. Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified site that will support viable industrial development;<br>b. Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development;<br>c. Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods;<br>d. Where available infrastructure is inadequate and improvements are economically infeasible to support the needs of industrial uses;<br>e. Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and | **No Conflict.** This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would change the Project Site's land use designation from Heavy Manufacturing to Limited Industrial, an industrial land use designation that is more compatible with surrounding residential, school, and future park uses. Development of the Project would not result in a fragmented pattern of development because it would not physically divide an established community. Specifically, the Project Site is generally bordered by the Glendale Freeway(SR-2), the Los Angeles River, a railway, and a future park, all of which limit access to the Project Site area from the surrounding established community. The immediate vicinity of the Project Site includes a self-storage facility, while the area beyond the freeway, river, and railway is developed with a mixed of commercial, residential, industrial, and institutional land uses. Development of new residential and mixed-use projects is proposed for other properties in the vicinity of the Project Site. Development of the proposed Project would reinforce current mixed-use trends and, particularly given the somewhat isolated nature of the Project Site, would not result in a fragmented pattern of development. Although the proposed Project would not include industrial |

| Framework Element Goals, Objectives, and Policies | Project Consistency Analysis |
|---|---|
| reduce the integrity and viability of existing industrial areas;<br>f. Where the conversion of industrial lands to an alternative use will not result in an adverse impact on adjacent residential neighborhoods, commercial districts, or other land uses;<br>g. Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts; and/or<br>h. Where existing industrial uses constitute a hazard to adjacent residential or natural areas. | uses, the proposed zoning and Community Plan land use designation would allow light industrial and manufacturing uses onsite. As the current PF zoning would not allow any industrial uses, the proposed Project would actually facilitate possible industrial use in the future. Even though the proposed Limited Industrial designation would not be consistent with certain heavy industrial uses, such uses are not currently located onsite and are not permitted under the current zoning. Furthermore, the Project Site represents only approximately 0.5% of the industrially-zoned land in the Northeast Los Angeles CPA. Therefore, the Project would not adversely impact the City's ability to accommodate sufficient industrial uses. |
| ***Housing Chapter*** | |
| **Goal 4A:** An equitable distribution of housing opportunities by type and cost accessible to all residents of the City. | **No Conflict.** The proposed Project's dwelling units would be of different sizes and configurations (studio, one-bedroom, and two-bedroom units) and would be available at a range of market rates and reserved as affordable units. Thirty-five (35) dwelling units would be reserved for Very Low Income residents. As such, the proposed Project would diversify the housing stock and would promote individual choice in type, quality, price, and location. The proposed Project would be consistent with this policy. |
| **Objective 4.2:** Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods. | **No Conflict.** The proposed Project would provide multi-family residential units in an area that would be conveniently located near numerous community services, retail, and employment opportunities. The closest bus stop to the Project Site is located at the intersection of Fletcher Drive and La Clede Avenue, approximately 0.3 mile northwest from the Project Site. Metro provides Bus Route 603 at this location. Metro Bus Route 603 provides service between the Grand/Los Angeles Trade and Technical College (LATTC) Metro Station in the City of Los Angeles and the City of Glendale. Additionally, SR-2, Los Angeles River, and railroad right-of-way corridor that surround the Project Site provide a buffer and transition from existing lower-density residential neighborhoods. |
| ***Economic Development Chapter*** | |
| **Goal 7B:** A City with land appropriately and sufficiently designated to sustain a robust commercial and industrial base. | **No Conflict.** This is an economic development goal that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The proposed Project would construct a mixed-use development consisting of five buildings with up to 419 multi-family residential units and up to 64,000 square feet of |

| Framework Element Goals, Objectives, and Policies | Project Consistency Analysis |
|---|---|
| | commercial space. The proposed Project would change the Project Site's land use designation from Heavy Manufacturing to Limited Industrial, an industrial land use designation that is more compatible with surrounding residential, school, and future park uses. Although the proposed Project would not include industrial uses, it would include a significant commercial component. Moreover, the proposed zoning and Community Plan land use designation would allow light industrial and manufacturing uses onsite. As the current PF zoning would not allow any industrial uses, the Project would actually facilitate possible industrial use in the future. Even though the proposed Limited Industrial designation would not be consistent with certain heavy industrial uses, such uses are not currently located onsite and are not permitted under the current zoning. Furthermore, the Project Site represents only approximately 0.5% of the industrially-zoned land in the Northeast Los Angeles CPA. Therefore, adequate land would remain for a robust industrial base, and the Project would contribute to a robust commercial base. The proposed Project would be consistent with the intent of this goal. |
| **Objective 7.2:** Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality. | **No Conflict.** As mentioned above, the proposed Project would include a mixed-use development with multi-family residential and a variety of commercial uses (restaurant, office, and urban farm). The proposed Project would provide a balance of new land uses by combining residential uses, creative office uses, restaurant space and an urban farm on an infill site that is suitable for the proposed lands uses. Thus, the proposed Project would be consistent with this objective. |
| **Policy 7.2.8.** Retain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors. | **No Conflict.** This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The proposed Project would change the Project Site's land use designation from Heavy Manufacturing to Limited Industrial, an industrial land use designation that is more compatible with surrounding residential, school, and future park uses. Although the proposed Project would not include industrial uses, it would include a significant commercial component. Moreover, the proposed zoning and Community Plan land use designation would allow light industrial and manufacturing uses onsite. As the current PF zoning would not allow any industrial uses, the Project would actually facilitate possible industrial use in the future. Even though the proposed Limited Industrial designation would not be consistent with certain heavy industrial uses, such uses are not currently located onsite and are not permitted under the |

| Framework Element Goals, Objectives, and Policies | Project Consistency Analysis |
|---|---|
| | current zoning. Furthermore, the Project Site represents only approximately 0.5% of the industrially-zoned land in the Northeast Los Angeles CPA. Therefore, adequate land would remain for emerging industrial sectors. |
| **Policy 7.2.9.** Limit the redesignation of existing industrial land to other land uses except in cases where such redesignation serves to mitigate existing land use conflicts, and where it meets the criteria spelled out in Policy 3.14.6 of Chapter 3: Land Use. | **No Conflict.** This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. As discussed above, the Project Site would retain an industrial land use designation. Unlike the current PF zoning the proposed CM zoning would allow light industrial and manufacturing uses. See also Policy 3.14.6 above. |
| **Goal 7G:** A range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City. | **No Conflict.** The proposed Project's dwelling units would be of different sizes and configurations (studio, one-bedroom, and two-bedroom units) and would be available at a range of market rates. 11 percent of the total units will be reserved for Very Low Income residents. The proposed Project would increase the housing choices available in the Northeast Los Angeles community. Additionally, the proposed Project's mixed-use design would allow future residents the opportunity to work on-site. |
| *Source: City of Los Angeles, Department of City Planning, General Plan Framework Element, adopted December 11, 1996, re-adopted August 8, 2001.*<br>*Parker Environmental Consultants, 2018.* | |

### *(ii) Housing Element*

The proposed Project would promote applicable objectives of the Housing Element adopted for the purpose of avoiding or mitigating an environmental effect. Table IV.F-2, below, provides a project consistency analysis with such applicable objectives of the Housing Element.

**Table IV.F-2**
**City of Los Angeles General Plan Housing Element Consistency Analysis**

| City of Los Angeles General Plan Objectives | Project Consistency Analysis |
|---|---|
| ***Housing Element Objectives*** | |
| **Objective 1.1:** Produce an adequate supply of rental and ownership housing in order to meet current and projected needs. | **No Conflict.** The proposed Project involves the construction of a mixed-use project, which would include 419 multi-family residential units. The proposed Project would supplement the City's rental stock to help meet the current and projected needs of the Northeast Los Angeles Community and the City of Los Angeles. As such, the proposed Project would not conflict with this objective. |

| City of Los Angeles General Plan Objectives | Project Consistency Analysis |
|---|---|
| **Objective 1.2:** Preserve quality rental and ownership housing for households of all income levels and special needs. | **No Conflict.** The proposed Project would provide multi-family residential units available to all persons. Additionally, the proposed Project would reserve 35 dwelling units for Very Low Income residents, which would support this objective and ensure that there are housing opportunities for all income levels of the Los Angeles population. As such, the proposed Project would not conflict with this objective. |
| **Objective 2.1:** Promote safety and health within neighborhoods. | **No Conflict.** The proposed Project would not create a health or safety risk to the environment or the existing community, as discussed in Section IV.E, Hazardous Materials/Risk of Upset. Further, the proposed Project would be designed in accordance with Los Angeles Fire Department (LAFD) and Los Angeles Police Department (LAPD) requirements to ensure safety and security on-site and in the surrounding areas. As discussed below, under Objective 9, construction and operation of the proposed Project would be coordinated with LADOT and LAFD to ensure proper emergency access and emergency routes. As such, the proposed Project would not conflict with this objective. |
| **Objective 2.2:** Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services, and transit. | **No Conflict.** The proposed Project involves a mixed-use development in an area characterized by industrial uses, commercial uses, institutional uses, and open space. The proposed Project would supplement the area with residential dwelling units and commercial space. The proposed Project would be designed to promote and support pedestrian activity on-site and in the Project Site area. The proposed Project would provide pedestrian connectivity from Casitas Avenue and the Los Angeles River. The proposed Project would provide pedestrian amenities and commercial uses facing the Los Angeles River that would promote pedestrian activity along the river. Additionally, the Project Site is within proximity to many services, job opportunities, and transit opportunities along Fletcher Drive and San Fernando Road. As such, the proposed Project would not conflict with this objective. |
| **Objective 2.3:** Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources. | **No Conflict.** The proposed Project would be required to comply with the City's Green Building Code, which implements building requirements to promote energy efficiency and water conservation to minimize the use on non-renewable resources. As such, the proposed Project would not conflict with this objective. |
| **Objective 2.4:** Promote livable neighborhoods with a mix of housing types, quality design, and a scale and character that respects unique residential neighborhoods of the City. | **No Conflict.** The Project Site is uniquely located on a property that is encumbered by a number of man-made barriers that separate the Project Site from the surrounding neighborhoods. The properties surrounding the Project Site are designated as Commercial Manufacturing, Open Space, and Public Facilities. The Project Site is immediately bordered by a self-storage facility and SR-2 to the north. SR-2 also borders the Project Site to the west. The Los Angeles River borders the |

| City of Los Angeles General Plan Objectives | Project Consistency Analysis |
|---|---|
| | Project Site to the south. The Southern Pacific railway easement borders the Project Site to the east. These three features limit access to the Project Site from the surrounding neighborhood.<br><br>The proposed Project would introduce a mixed-use development to an area that is generally isolated from the surrounding community. As discussed in Section IV.A, Aesthetics, due to the Project Site's isolation from the surrounding community, the Project Site lacks a predominant aesthetic character. The proposed Project would be designed to support the CDO Design Guidelines and the RIO Ordinance, which provide direction on building design and landscaping. As such, the proposed Project would support the vision for the Project area.<br><br>Further, the proposed Project would add to the housing stock and would increase the mix of housing types within the City of Los Angeles. As such, the proposed Project would not conflict with this objective. |
| **Objective 2.5:** Promote a more equitable distribution of affordable housing opportunities throughout the City. | **No Conflict.** Development of the proposed Project would not remove any existing dwelling units as none currently exist on-site. The proposed Project would be consistent with this objective by reserving 35 dwelling units as Very Low Income housing units. As such, the proposed Project would not conflict with this objective. |
| **Objective 3.1:** Ensure that housing opportunities are accessible to all residents without discrimination on the basis of race, ancestry, sex, national origin, color, religion, sexual orientation, marital status, familial status, age, disability (including HIV/AIDS), and student status. | **No Conflict.** The proposed Project would provide multi-family residential units that would be available to all persons without discrimination. As such, the proposed Project would be consistent with this objective. |
| **Objective 3.2:** Promote fair housing practices and accessibility among residents, community stakeholders, and those involved in the production, preservation, and operation of housing. | **No Conflict.** The proposed Project's dwelling units and commercial uses would be available to all persons without discrimination. The proposed Project's mixed-use nature would support the area's residents and community stakeholders with new dwelling units, commercial space, and job opportunities. As such, the proposed Project would not conflict with this objective. |
| *Source: City of Los Angeles, Department of City Planning, General Plan: Housing Element 2013-2021, December 2, 2013.*<br>*Parker Environmental Consultants, 2019.* | |

*(iii) Air Quality Element*

The proposed Project is an infill, mixed-use development that would replace an existing 117,000 square-foot warehouse/production building with a mixed-use project generating an increase of 2,551 net daily trips. As noted in Section IV.K, Traffic/Transportation, the elimination of the existing uses would eliminate 440 daily trips. Additionally, the trip generation estimates for the proposed uses include a 15% reduction for residential transit trips, a combined 10% trip reduction for the creative space for internal trips and transit trips, and an 80% reduction for internal trips associated with the on-site restaurant uses. The proposed commercial restaurant uses are oriented along the Los Angeles River and would be accessible to the neighborhoods to the north and south of the Project Site by the pedestrian path along the L.A. River. The proposed Project would reduce dependence on single-occupancy vehicles.

As discussed in Section IV.B, Air Quality, the proposed Project would result in a less-than-significant impact during its construction and operational phases. The proposed Project would comply with applicable provisions of the Los Angeles Green Building Code, which would further reduce emissions associated with the proposed Project. Therefore, the proposed Project would promote good air quality with continued population growth and a healthy economic environment consistent with the City's goals within the Air Quality Element.

*(iv) Conservation Element*

The Conservation Element focuses on the conservation and preservation of natural resources and historical and cultural resources within the City of Los Angeles. The proposed Project is an infill development project located within a developed area with no natural resources existing on-site. The proposed Project would be consistent with the Conservation Element's policy to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, as the existing light manufacturing building on-site is not identified as a historic resource and there are no known or recorded archaeological, paleontological or Native American Tribal resources within the Project Site. As discussed in greater detail in Section IV.L, Cultural Resources, development of the proposed Project would have a less-than-significant impact upon archeological and paleontological resources. Additionally, as concluded in Section IV.N, Tribal Cultural Resources, there are no known tribal cultural resources present within the Project Site. As such, impacts upon tribal cultural resources were concluded to be less than significant with adherence to the City's Tribal Cultural Resources Inadvertent Discovery condition of approval. In the unlikely event such materials are encountered during construction, compliance with the City's Tribal Cultural

Resources Inadvertent Discovery condition would ensure appropriate protocol is followed to reduce the potential impacts to tribal cultural resources to less-than-significant levels.

Furthermore, as discussed in Section IV.M, Biological Resources, the proposed Project would have a less than significant impact upon sensitive habitat and animal species. Thus, the proposed Project would be consistent with the Conservation Element's policy to require evaluation, avoidance, and minimization of potential significant impacts, as well as mitigation of unavoidable significant impacts on sensitive animal and plant species and their habitats and habitat corridors relative to land development. As such, the proposed Project would be consistent with the goals of the Conservation Element.

*(v) Safety Element*

As discussed in Section IV.C, Geology and Soils, the proposed Project would result in a less-than-significant impact without mitigation. The proposed Project is not expected to create a risk of injury, loss of life, property damage, or disrupt the social and economic life of the City due to fire, water hazard, seismic event, or geologic conditions. As noted in the Initial Study Checklist, potential impacts associated with wildfire were concluded to be less than significant as the Project Site is located in an urbanized area and is not located in a very high fire hazard severity zone.[13] As such, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Moreover, as discussed in Section IV.E, Hazardous Materials/Risk of Upset, the proposed Project would result in a less-than-significant impact associated with building demolition, building construction, and storage and use of potentially hazardous materials during the life of the proposed Project with the incorporation of identified mitigation measures. The proposed Project would implement mitigation measures that would reduce any impacts from the release of hazardous materials. Further, as discussed in Section IV.I, Public Services, the Project Site is and would continue to be adequately served by the LAFD and LAPD. The proposed Project is not expected to interfere or hinder emergency vehicle response. The proposed Project would be designed and constructed in consultation with appropriate City agencies and departments, including, but not limited to, the LADBS, LAFD, and LADOT, to ensure that the proposed Project would not create or introduce any hazardous features. Therefore, the proposed Project would be consistent with the goals of the Safety Element.

*(vi) Mobility Plan 2035*

The proposed Project would promote applicable goals of the Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect. A consistency analysis

[13] *See CEQA Initial Study Checklist (in Appendix A to this EIR) at page B-13.*

addressing each of such applicable goals, as applicable to the proposed Project is provided in Table IV.F-3.

**Table IV.F-3**
**Project Consistency Analysis with Applicable Provisions of the Mobility Plan 2035**

| Objective / Policy | Comments |
|---|---|
| • Safety First: Crashes, speed, protection, security, safety education, and enforcement. | **No Conflict**. The proposed Project is located at the terminus of Casitas Avenue, which is designated as a local street. No other public roadways border the Project Site. As such, the proposed Project's residential and commercial land uses would not be exposed to traffic hazards associated with speeding vehicles or unsafe turning movements, as access to the Project Site occurs within a cul-de-sac. The proposed Project would also ensure public safety during construction with the implementation of a Construction Traffic Control/Management Plan ("Plan") (PDF-TRANS-1). The Plan would ensure adequate construction worker parking is provided in designated on-site locations or within a designated off-street parking lot. Additional provisions to ensure public safety is maintained during construction are incorporated into PDF-TRANS-2 through PDF-TRANS-4 in Section IV.K, Traffic/Transportation. |
| • World Class Infrastructure: Design, Complete Street Network (walking, bicycling, transit, vehicles, and good movement), bridges, highways, and smart investments. | **No Conflict.** Access to the proposed Project would be designed and constructed in consultation with LADOT and LAFD and would not include unusual or hazardous design features. The proposed Project would be designed to promote and support a walkable site by providing pedestrian linkages from Casitas Avenue and the proposed residential uses on-site to the proposed neighborhood serving commercial uses. Further, the proposed Project would not impede or conflict with vehicular movement on SR-2 and would not impede with goods movement along the railroad corridor. |
| • Access for All Angelenos: Affordability, vulnerable users, land use, operations, reliability, demand management, and community connection. | **No Conflict.** The proposed Project incorporates an affordable housing component that would reserve 11 percent of the total dwelling units (i.e., 35 units) for persons in the Very Low Income level. Dwelling units would be of different sizes and configurations (studio, one-bedroom, and two-bedroom units). As such, the proposed Project would provide accessibility for a range of users, including vulnerable users such as children, seniors and the disabled. The Project Site is geographically isolated from neighboring communities to the east and north by the railroad r-o-w and the SR-2. |

| | |
|---|---|
| | However, the proposed Project is designed to promote connectivity to the LA River corridor by orienting the commercial restaurant land uses along the west side of the Project Site fronting the LA River and would provide a linear fire lane and walking path along the southern property line to facilitate pedestrian and bike access. |
| • Collaboration, Communication, and Informed Choices: Real-time information, open-source data, transparency, monitoring, reporting, departmental and agency cooperation, database management, parking options, loading and unloading, and goods movement. | **No Conflict.** This is a City-wide policy to promote collaboration, communication, and informed choices. The Applicant has met with various City Departments, local stakeholders and Neighborhood Council groups, and representatives from Friends of Los Angeles River (FOLAR) and the Bowtie Park Project. The proposed Project would accommodate its parking demand and loading and unloading activities on-site with no disruption to the surrounding land uses. |
| • Clean Environments and Healthy Communities: Environment, public health, clean air, and clean fuels and fleets. | **No Conflict.** As discussed in Section IV.D, Greenhouse Gas Emissions, the proposed Project would comply with the L.A. Green Code's mandate to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), reduce the overall use of potable water by 20 percent, meet the applicable provisions of the California Energy Code, and comply with the construction and demolition solid waste handling and diversion requirements for construction and operation. In addition to meeting the minimum code requirements, the proposed urban farm would utilize ecologically sustainable methods in a 100-percent renewable solar energy-powered, climate-controlled urban greenhouse (see PDF GHG-1 in Section IV.D, Greenhouse Gas Emissions). As such, the proposed Project would promote public health, clean air, clean fuels, and fleets. |
| *Source: City of Los Angeles, The Mobility Plan 2035 of the City of Los Angeles General Plan (Mobility Plan 2035), amendment adopted January 20, 2016.* | |

### *(vii) Noise Element*

The proposed Project would implement all technically feasible noise attenuation measures to ensure that noise impacts during the construction phase would reduce noise levels to the maximum extent that is technically feasible. Because of the relatively low volume of traffic that utilizes the residential streets to the north of the Project Site, which provide the only available roadway access to the Project Site, the proposed Project's added traffic is anticipated to create a substantial increase (i.e., greater than 5 dBA) in roadway noise volume as compared to existing baseline conditions. The proposed Project

impacts to local roadway noise would be significant and unavoidable for two roadways in the adjacent residential neighborhood – Larga Avenue (between Fletcher Drive and Carillion Street) and La Clede Avenue (between Fletcher Drive and Carillion Street). However, the projected roadway noise levels at these two locations would be 61.7 dBA and 61.9 dBA CNEL, which fall within the "conditionally acceptable" range for exterior noise levels in proximity to single family land uses. As such, the exterior roadway noise levels at the impacted roadway segments would be consistent with the Community Noise Exposure Guidelines identified in the City's Noise Element of the General Plan.

*(viii) Land Use Element (Northeast Los Angeles Community Plan)*

The Project Site is located within the Atwater Village neighborhood in the Northeast Los Angeles CPA. Therefore, all development activity on-site is subject to the land use policies of the Northeast Los Angeles Community Plan (Community Plan). A consistency analysis of the proposed Project as it relates to applicable objectives and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in Table IV.F-4, Project Consistency Analysis with Applicable Provisions in the Northeast Los Angeles Community Plan, below. As shown in the table, the proposed Project would be consistent with the goals, objectives, and land use policies identified in the Community Plan. The below table also analyzes, for informational purposes, the Project's consistency with certain economic development goals, objectives, or policies. As these economic development goals, objectives, and policies were not adopted for the purpose of avoiding or mitigating an environmental effect, any potential inconsistency therewith would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).)

**Table IV.F-4**
**Project Consistency Analysis with Applicable Provisions in the Northeast Los Angeles Community Plan**

| Objective/Policy | Comments |
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| ***Residential*** | |
| Goal 1: A safe, secure, and attractive residential environment for all economic, age, and ethnic segments of the community. | **No Conflict.** The LAPD would be consulted during the design and construction of the proposed Project to increase on-site security and reduce dead zones and attractive nuisances. The Project would be attractively designed and landscaped and would promote the RIO Ordinance and the CDO Design Guidelines. All 419 proposed dwelling units would be available to all persons without discrimination. Moreover, the proposed Project would include 35 units reserved for Very Low Income tenants. As such, the proposed Project would not conflict with this goal. |
| Objective 1-1: To preserve and enhance existing residential neighborhoods. | **No Conflict.** As discussed above, the Project Site is uniquely located on a property that is encumbered by a number of man-made barriers that separate the immediate area from surrounding neighborhoods. A residential neighborhood exists to the west and north of SR-2. Development of the proposed Project would not visually contribute to this neighborhood. The proposed Project would place residential land uses along the Los Angeles River similar to the River House. The River House is a condominium development on the south side of the Los Angeles River, which is located across the River from the Project Site. In the greater Project area, the proposed Project's multi-family residential buildings would also be similar to the Taylor Yard Transit Village, a five-phase master plan development involving a sustainable community along the Los Angeles River to the southeast of the Project Site, fronting San Fernando Road. Development of the proposed Project would be consistent with the RIO Ordinance and would visually enhance the surrounding area. The proposed Project would not conflict with this objective. |
| Policy 1-1.1: Protect existing stable single-family and other lower density residential neighborhoods from encroachment by higher density residential and other uses that are incompatible as to scale and character or would otherwise diminish the quality of life. | **No Conflict.** A residential community that contains single-family and multi-family dwelling units is located to the north and west of SR-2. The Project Site is located on the opposite side of SR-2. As previously discussed, the Project Site is isolated from the surrounding community. As such, the proposed Project would not encroach on the residential community to the west and north of the Project Site and SR-2. The Project Site is immediately surrounded by a public storage facility, vacant land that was previously a part of the Taylor Yard, a railway, SR-2, and the Los Angeles River. The immediately surrounding area is zoned for commercial manufacturing, public facilities, and open space. The Project Site is currently zoned for Public Facilities and has a land use designation of Heavy Manufacturing. With approval of the entitlement requests, the development of a mixed-use project would be allowed on-site. The proposed Project's design and scale would be reminiscent of the area's industrial character. The proposed Project would be well-designed and landscaped and would enhance the character of the Project Site. As such, the proposed Project would not conflict with this policy. |

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| Policy 1-1.2: Promote neighborhood preservation, particularly in existing single-family neighborhoods, as well as in areas with existing multiple-family residences. | **No Conflict.** As discussed under Policy 1-1.1, the proposed Project would not encroach on the existing residential neighborhood to the west and north of SR-2. Therefore, the proposed Project would not hinder the preservation of the existing neighborhood, and the proposed Project would not conflict with this policy. |
| Objective 1-2: To allocate land for new housing to accommodate a growth of population that is consistent with and promotes the health, safety, welfare, convenience, and pleasant environment of those who live and work in the community based on adequate infrastructure and government services, especially schools. | **No Conflict.** A project would be inconsistent with this objective if the population generated by the project would exceed SCAG's population growth forecasts or if the project would cause public services or utilities to operate beyond capacity. The proposed Project's generation of 1,127 residents and 419 dwelling units would be within SCAG's 2016-2040 RTP/SCS Growth Forecast projections for the City of Los Angeles. Nevertheless, as discussed in Section IV.I, Public Services, and Section IV.J, Public Utilities, the proposed Project would not create a significant negative impact that cannot be mitigated to a less-than-significant level for all public services, utilities, and service systems, including schools. Therefore, the Project would be consistent with and promote the health, safety, welfare, convenience, and pleasant environment of the Northeast Los Angeles CPA. |
| Policy 1-2.1: Designate specific areas to provide for adequate residential development to accommodate anticipated increases in population while maintaining a balance between single-family and multiple-family uses. | **No Conflict.** The Project Site is currently used for light industrial uses. As such, the proposed Project would not displace any single-family or multiple-family housing. As discussed above, the Project proposes the development of 419 multi-family dwelling units, 35 dwelling units of which would be reserved for Very Low Income households. The proposed Project would be within the projected population growth for the City. Therefore, the proposed Project would not conflict with this policy. |
| Policy 1-2.2: Locate higher residential densities near commercial and institutional centers, light rail transit stations, and major bus routes to encourage pedestrian activity and use of public transportation, providing that infrastructure, public service facilities, utilities, and topography will fully accommodate this development. | **No Conflict.** The proposed Project would be expected to generate approximately 1,127 new residents. The proposed Project is within walking distance of Fletcher Drive, which provides commercial services and bus stops. The proposed Project would encourage and support pedestrian activity on the Project Site and in the Project area. The proposed Project would include pedestrian-oriented development and include pedestrian amenities, such as paths and bicycle lanes. The proposed Project would promote pedestrian uses along the Los Angeles River along the southern property line. The proposed Project would also open the Project Site to pedestrian access between the Los Angeles River and Casitas Avenue and increase connectivity of the Project area. Although the proposed Project is not located in a commercial or institutional center, near light rail transit stations, or major bus routes, the proposed Project would support the intent of this policy and promote pedestrian activity in the area. |

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| Policy 1-2.3: Encourage mixed-use development in selected commercially-zoned areas. | **No Conflict.** The Project Site is currently zoned [Q]PF-1-CDO-RIO. The Project Applicant is requesting a zone change to CM-1-CDO-RIO. The Project area includes industrial uses, open space, and public facilities. The Project Site is within walking distance from commercial uses along Fletcher Drive. Even though the Project Site is not located in a substantially commercial area, the proposed Project would support and increase pedestrian activity on-site and in the Project area. The proposed Project would not conflict with the intent of this policy and encourage mixed-use development in the Project area. |
| Objective 1-3: To preserve and enhance the residential character and scale of existing single- and multi-family neighborhoods. | **No Conflict.** As discussed above, the Project Site is isolated from the surrounding community, including the residential community to the north and west of SR-2. As such, development of the proposed Project would not affect the residential character or scale of the existing residential neighborhood. The proposed Project would not conflict with this objective. |
| Policy 1-3.1: Protect the quality and scale of the residential environment through attention to the appearance of new construction including site planning and compatible building design. | **No Conflict.** The proposed Project would be designed to be visually consistent with the surrounding neighborhood as it relates to building siting, architectural design, architectural materials, and landscaping. The proposed Project's modern design is reminiscent of the surrounding area's commercial and industrial land uses. Additionally, the proposed Project would require a Site Plan Review and a Tentative Tract Map review from the City of Los Angeles. Thus, all design and construction plans would be approved by the City of Los Angeles. As such, the proposed Project would not conflict with this policy. |
| Policy 1-3.2: Consider factors, such as neighborhood character and aesthetics, identity; compatibility of land uses; impacts on livability, services, public facilities, and traffic levels when changes in residential densities are proposed. | **No Conflict.** As discussed in Section, IV.A, Aesthetics, the proposed Project would contribute to the neighborhood character by redeveloping an underutilized Project Site that would promote pedestrian activity at the Project Site and surrounding area (which would add to the community character and enhance livability in the area). The proposed residential uses and neighborhood serving commercial land uses would be compatible with the residential neighborhood to the north. As shown in Figure II-5, Ground Level Floor Plan and Landscape Plan, a designated fire lane and pedestrian walkway separating Buildings A and G (parking garage) and pedestrian corridor between Buildings C and D, would provide pedestrian access to a designated fire lane improved with a walking path along the southern and eastern property lines adjacent to the LA River corridor and proposed Bowtie Park property. These linkages would connect the on-site residential uses and neighboring residential uses to the proposed creative office space and neighborhood serving commercial land uses. As such, the proposed Project would not conflict with this policy. |

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| Objective 1-4: To preserve and enhance neighborhoods with a distinctive and significant historical and architectural character. | **No Conflict.** As discussed above, the proposed Project would not encroach on the residential community to the north and west of SR-2 and would not impact the visual character of the adjacent neighborhoods.<br><br>As more thoroughly discussed in Section IV.A, Aesthetics, the Project Site is isolated from the surrounding community due to man-made features that encumber access to the Project Site. The self-storage facility to the north of the Project Site is the only property that includes buildings immediately abutting the Project Site. As such, the immediate area surrounding the Project Site lacks a distinctive historical or architectural character. Therefore, the proposed Project would not conflict with this objective. |
| Objective 1-6: To promote and ensure the provision of fair and equal housing opportunities for all persons regardless of income and age groups or ethnic, religious, or racial background. | **No Conflict.** The proposed Project would include 419 dwelling units, 35 dwelling units of which would be reserved for Very Low Income residents. All dwelling units would be available to all persons without discrimination. The proposed Project would not conflict with this objective. |
| Policy 1-6.1: Promote individual choice in type, quality, price, and location of housing. | **No Conflict.** The proposed Project's residential units would include a mix of studio, one-bedroom, and two-bedroom units. Additionally, 35 dwelling units would be reserved for Very Low Income residents. As such, the proposed Project would diversify the housing stock and would promote individual choice in type, quality, price, and location. The proposed Project would not conflict with this policy. |
| Policy 1-6.2: Promote mixed use in all multiple-family residential projects in commercial zones. | **No Conflict.** The proposed Project involves a mixed-use development within an area used for commercial and light industrial uses. The proposed Project's commercial uses would promote pedestrian activity on the Project Site, in the Project area, and along the Los Angeles River. As such, the proposed Project would not be in conflict with this policy. |
| Policy 1-6.3: Ensure that redevelopment activity minimizes displacement of residents. | **No Conflict.** The Project Site is currently developed with a light industrial building, and development of the Project Site would not displace any residents. The proposed Project would not conflict with this policy. |
| ***Commercial*** | |

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| Goal 2: Strong and competitive commercial areas that suitably serve the needs of the community and attract customers from outside the plan area by satisfying market demand and maximizing convenience and accessibility while preserving unique historic and cultural identities of each commercial area. | **No Conflict.** Although this goal is directed towards the City, the proposed Project would support this goal. The Project Site is located along the Los Angeles River. A maintenance road, which is used by the surrounding community as a pedestrian path, runs along the south side of the Project Site and along the Los Angeles River. The Project area and the greater Los Angeles community, especially the communities along the river, utilize the pedestrian paths along the Los Angeles River corridor.<br><br>The LARRMP and the RIO Ordinance set forth revitalization goals and strategies for the Los Angeles River to increase pedestrian activity, complement the river, and restore the natural habitat. The proposed Project would redevelop an underutilized site with a well-designed and landscaped project. The proposed Project would provide commercial uses and pedestrian amenities (such as a bicycle path and pedestrian path) that would support pedestrian activity along the Los Angeles River. The proposed Project would increase neighborhood connectivity by providing connection between Casitas Avenue and the path along the Los Angeles River. As such, the proposed Project has the possibility to attract customers and to maximize convenient access to commercial opportunities and would not conflict with this policy. |
| Objective 2-1: To conserve and strengthen potentially viable commercial areas in order to stimulate and revitalize existing businesses and create opportunities for appropriate new commercial development. | **No Conflict.** The proposed Project is not located on a prominent commercial street, such as Fletcher Drive, Eagle Rock Boulevard, Verdugo Road, Cypress Avenue, Figueroa Street, San Fernando Road, Colorado Boulevard, or Division Street, identified by the Community Plan of the CDO Design Guidelines. Nevertheless, the proposed Project is uniquely positioned to support and provide commercial opportunities along the Los Angeles River and near the Bowtie Project location that brings potential customers to the Project area. As such, the proposed Project would create new opportunities for commercial development. The proposed Project would not conflict with this objective. |
| Policy 2-1.1: Consolidate commercial areas through appropriate planning and zoning actions to strengthen the economic base and expand market opportunities. | **No Conflict.** Although the Project Site is currently zoned for Public Facilities, the Project Site is developed with light industrial uses associated with private businesses. The property immediately to the north of the Project Site has a land use designation of commercial manufacturing. Commercial land uses also exist to the east of the railway. The proposed Project would rezone the Project Site similar to surrounding land uses and would provide commercial uses on-site. As discussed under Objective 2-1, above, the propose Project would provide new commercial opportunities that would contribute to the expansion of the City's economic base. The proposed Project would not conflict with this policy. |

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| Policy 2-1.2: Protect commercially planned / zoned areas from residential-only development. | **No Conflict.** The proposed Project includes a zone change to CM-1-CDO-RIO and a General Plan amendment to Limited Industrial to allow for the development of the proposed Project, which would involve a mixed-use residential development with commercial land uses, including restaurants, office uses, and an urban farm. As such, the proposed Project would not include residential-only development. The proposed Project would not conflict with this policy. |
| Policy 2-2.2: Require that projects in commercial areas be designed and developed to achieve a high level of quality, distinctive character, and compatibility with appropriate existing uses and development. | **No Conflict.** The proposed Project would be well-designed and landscaped in accordance with applicable design guidelines (including, but not limited to, the CDO Design Guidelines and Chapter V, Urban Design, of the Community Plan) and the RIO Ordinance. These guidelines and standards are in place to ensure that projects are designed and developed to achieve a high level of quality, have a distinctive character, and are compatible with existing uses and development. Therefore, the proposed Project would not conflict with this policy. |
| Objective 2-3: To minimize conflicts between auto-related and pedestrian-oriented activities and encourage use of public transportation in commercial areas. | **No Conflict.** The proposed Project is accessible via a single driveway located off of Casitas Avenue, which terminates as a cul-de-sac in front of the Project Site. Access to the seven-story parking structure would have over 250 feet of approach between the street and the parking structure. The proposed creative office space and neighborhood-serving commercial uses would be accessible to residents in the neighborhoods located north of SR-2, via the Casitas Avenue undercrossing. Further, all parking on site would be provided in a seven-story parking structure with driveway access from Casitas Avenue to prevent pedestrian and vehicle conflict within the Project Site. As such, access to the proposed Project would not disturb access or traffic flow on Casitas Avenue. Therefore, the proposed Project would not conflict with with this objective. |
| Policy 2-3.2: Encourage the formation of pedestrian-friendly shopping environments. | **No Conflict.** As discussed under Policy 1-2.2, above, the proposed Project would promote pedestrian activity on and through the Project Site connecting the residential land uses with the proposed neighborhood serving commercial land uses. The two restaurant spaces proposed on the north and south corners of Buildings B and D, respectively would be connected by a pedestrian walkway and restricted Fire Lane that traverses the southern boundary of the Project Site adjacent to the LADWP easement fronting the LA River corridor. Vehicle parking would be provided in one seven-story parking structure with no vehicular driveways on-site (besides fire lanes). The proposed Project would encourage pedestrian activity on-site by limiting automobile access on the Project Site. As such, the proposed Project would not conflict with this Policy. |
| ***Industrial*** | |

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| Goal 3: Sufficient land for the range of industrial uses necessary to provide maximum employment opportunities, especially for local residents; that are safe for the environment and the work force; and have minimal adverse impact on adjacent uses and infrastructure resources.<br><br>Policy 3-1.1: Preserve existing industrial areas that have the greatest viability and compatibility and the least adverse impact on nearby uses. | **No Conflict.** Both of these relate to economic development, and none were specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The proposed Project would change the Project Site's land use designation from Heavy Manufacturing to Limited Industrial, an industrial land use designation that is more compatible with surrounding residential, school, and future park uses. Although the proposed Project would not include industrial uses, it would include a significant commercial component. Moreover, the proposed zoning and Community Plan land use designation would allow light industrial and manufacturing uses onsite. As the current PF zoning would not allow any industrial uses, the Project would facilitate possible industrial use in the future. Even though the proposed Limited Industrial designation would not be consistent with certain heavy industrial uses, such uses are not currently present onsite and are not permitted under the current zoning. Furthermore, the Project Site represents only approximately 0.5% of the industrially-zoned land in the Northeast Los Angeles CPA. Moreover, due to the somewhat isolated nature of the Project Site, which is surrounded by the Glendale Freeway (SR-2), the Los Angeles River, and a railway, thereby limiting access via Casitas Avenue from the surrounding neighborhood, the site is not well suited for heavy manufacturing or warehouse uses. In addition, heavy industrial uses would not be compatible with and could adversely impact nearby residential, school, and future park uses. Therefore, the proposed Project would not conflict with the intent of each of the goal and policy. |
| Objective 3-2: To provide for existing and future industrial uses that contribute job opportunities for residents and minimize adverse environmental and visual impacts on the community.<br><br>Policy 3-2.1: Designate lands for the continuation of appropriate existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses that are compatible with nearby uses, provide employment opportunities, and have minimal impact on the environment. | **No Conflict.** Both of these relate to economic development, and none were specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The proposed Project would change the Project Site's land use designation from Heavy Manufacturing to Limited Industrial, an industrial land use designation that is more compatible with surrounding residential, school, and future park uses. Although the proposed Project would not include industrial uses, it would include a significant commercial component. Moreover, the proposed zoning and Community Plan land use designation would allow light industrial and manufacturing uses onsite. As the current PF zoning would not allow industrial uses, the Project would facilitate possible industrial use in the future. Even though the proposed Limited Industrial designation would not be consistent with certain heavy industrial uses, such uses are not currently located onsite and are not permitted under the current zoning. Furthermore, the Project Site represents only approximately 0.5% of the industrially-zoned land in the Northeast Los Angeles CPA. Therefore, adequate land would remain for emerging industrial sectors. Moreover, heavy industrial uses would not be compatible with and could adversely impact nearby residential, school and future park uses. |

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| Objective 3-3: To retain industrial plan designations in order to attract appropriate industrial development to maintain the industrial employment base for community residents.<br><br>Policy 3-3.1: Protect large rail yards and other large industrially-planned parcels located in predominantly industrial areas from development by other uses that do not support the industrial and economic base of the city and the community. | **No Conflict.** This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would not affect any large rail yards; the nearby former Taylor Yard is being redeveloped with a multi-phase mixed-use project and, immediately adjacent to the Project Site, a public park. Refer also to Objective 3.2. |
| ***Open Space*** | |
| Goal 4: Sufficient open space, in balance with development, to serve the recreational, environmental, and health needs of the community and to protect environmental and aesthetic resources. | **No Conflict.** Pursuant to LAMC Section 12.21-G,2, the proposed Project would be required to provide 43,900 square feet of open space. The proposed Project would include 58,176 square feet of open space on-site. The proposed Project would be consistent with the LAMC. The open space on-site would include residential amenities, including communal patio, pool deck, lounge seating, outdoor barbeque, amenity deck, and community room, passive landscaped open space, a pedestrian path, and a bike path. The proposed Project would promote pedestrian activity on the Project Site and in the Project area by providing pedestrian paths and walkways throughout the Project Site linking the residential uses to the proposed creative office and commercial land uses, which would support the environmental and health needs of the community. As discussed in Section IV.A, Aesthetics, no aesthetic resources currently exist on the Project Site. The proposed Project would be well-designed and landscaped. As such, the proposed Project would not conflict with this goal. |
| ***Recreation and Park Facilities*** | |
| Goal 5: Adequate recreation and park facilities to meet the needs of the residents in the plan area. | **No Conflict.** The number of residents generated by the proposed Project would be within the estimated population growth for the City. The proposed Project would provide on-site open space that would exceed the requirements of the LAMC, which would reduce the proposed Project's demand on local parks. Additionally, the proposed Project would pay applicable Quimby fees. As such, although this goal is directed towards the City of Los Angeles, the proposed Project would not conflict with the intent of this goal. |
| ***Schools*** | |
| Goal 6: Adequate locations and adequate facilities for schools to serve the needs of existing and future population. | **No Conflict.** As discussed in Section IV.I, Public Services, the proposed Project would generate approximately 125 net new students. Area schools would be able to accommodate the proposed Project's student population. Additionally, the proposed Project would be required to pay developer school fees (pursuant to SB 50) to fully mitigate the impacts of the proposed Project on LAUSD schools. As such, although this goal is directed towards the City of Los Angeles, the proposed Project would not conflict with the intent of this goal. |

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| ***Libraries*** | |
| Goal 7: Adequate library facilities and services for the area's residents. | **No Conflict.** There are currently three library facilities within two miles of the Project Site. As discussed in Section IV.I.5, it is anticipated that the existing libraries within the Project area would be able to meet the proposed Project's demand for library services. As stated in the 2015-2020 Strategic Plan, LAPL is committed to increasing the number of people who use library services and the number of library cardholders. As such, the proposed Project would not be expected to significantly increase the demand on local library facilities. As such, although this goal is directed towards the City of Los Angeles, the proposed Project would not conflict with the intent of this goal. |
| ***Police Protection*** | |
| Objective 8-1: To provide adequate police facilities and personnel to correspond with population and service demands. | **No Conflict.** The Northeast Community Police Station currently serves the Project Site. The Northeast Community Police Station is located at 3353 San Fernando Road, approximately 0.9 mile north of the Project Site. The proposed Project would increase the utilization of the Project Site, which may lead to an increased police demand. The constant on-site presence of residents and customers of commercial uses would provide a measure of safety on-site. Prior to the issuance of a certificate of occupancy, the Project Applicant would submit a diagram of the Project Site to the LAPD to ensure adequate site access. As a mixed-use project, the proposed Project would provide an increased 24-hour community presence. The continuous presence of people and activity on-site is known to deter criminal activity as more eyes are on the street. Additionally, the proposed Project would include strategically positioned low-level and security lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security would be controlled to limit public access. The building and layout design of the proposed Project would also include crime prevention features, such as nighttime security lighting, full-time on-site professional security, security cameras monitored by on-site professional security, intrusion prevention systems and secure parking facilities. With the implementation of mitigation measures detailed in Section IV.I.2, the proposed Project would not create a significant impact to police services. As such, the proposed Project would not conflict with this objective. |
| Policy 8-1.1: Coordinate with Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands. | **No Conflict.** As discussed above, the proposed Project would coordinate with the LAPD to ensure adequate security and safety measures are incorporated into the design and operation of the proposed Project. The Project Applicant would submit a diagram of the Project Site to the LAPD to ensure adequate site access for police services. Additionally, the proposed Project's generation of approximately 1,127 residents would be within the projected capacity for the Northeast Los Angeles CPA. As such, the proposed Project would not conflict with this policy. |

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| ***Fire Protection*** | |
| Objective 9-1: Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses. | **No Conflict.** As discussed in Section IV.I, Public Services, based on correspondence from the LAFD, fire protection services are considered adequate based on the response distance between the two fire stations and the Project Site. (see also Appendix I, Public Service Letters). The proposed Project is not expected to necessitate the construction of a new fire station. As such, the proposed Project would not conflict with this objective. |
| ***Circulation*** | |
| Policy 10-1.1: Maintain Levels of Service for streets and highways not to exceed LOS "D" for secondary arterials, collector streets, and local streets; not to exceed LOS "E" on Major Highways of in the community's major business districts. | **No Conflict.** As discussed in Section IV.K Traffic/ Transportation, all study intersections would operate at LOS D or better under future plus project conditions, except for Riverside and Fletcher Drive (LOS F) and San Fernando Road and Fletcher Drive (LOS E). However, both intersections would be at these levels of service without the proposed Project, and the proposed Project would not cause the level of service at either intersection to degrade below LOS D. As such, the proposed Project would not conflict with this policy. |
| Policy 10-1.2: Design new development projects to minimize disturbance to existing traffic flow with proper ingress and egress to parking. | **No Conflict.** The proposed Project is accessible via a single driveway located off of Casitas Avenue, which terminates as a cul-de-sac in front of the Project Site. Access to the seven-story parking structure would have over 250 feet of approach between the street and the parking structure. As such, access to the proposed Project would not disturb access or traffic flow on Casitas Avenue. Thus, the proposed Project would not conflict with this policy. |
| ***Economic Development*** | |
| Goal 15: The revitalization of a physical environment conducive to increasing and improving economic activity. | **No Conflict.** The proposed Project would revitalize the Project Site with a well-designed and landscaped mixed-use development. The proposed Project would enhance the physical environment in a manner that supports the Community Plan, design regulations for development within the CDO District, and development regulations for projects within the RIO District. The proposed Project helps meet the City's needs to increase and diversify the housing stock and meet the projected population growth within the City of Los Angeles. The proposed Project would further provide commercial uses that would support the Project Site and the surrounding community. The proposed Project would not conflict with this goal. |
| Objective 15-1: To improve the visual environment of existing commercial and industrial areas. | **No Conflict.** The proposed Project would redevelop an existing industrial site with a mixed-use project. The mix of uses would include residential and commercial uses. The proposed Project would include well-designed buildings and would be landscaped throughout the Project Site. The proposed Project would be designed in conformance with the CDO Design Guidelines and RIO Ordinance development regulations. Both of these documents serve to guide development to visually improve the area. The proposed Project would not conflict with this objective. |
| *Source: City of Los Angeles, Department of City Planning, Northeast Los Angeles Community Plan, June 15, 1999.* | |

### *(ix) Los Angeles Municipal Code (LAMC)*

Zoning and Land Use Designations

The Project Site has a General Plan land use designation of Heavy Manufacturing and is currently zoned as [Q]PF-1-CDO-RIO.14 As discussed above, the City inadvertently rezoned the Project Site in 2010, and the current zoning and land use designations on-site do not correspond with one another. The Heavy Manufacturing land use designation corresponds with a M3 zone or P zone. The zoning designation of "PF" corresponds with a land use designation of Public Facilities.

As part of the proposed Project, the Applicant is requesting a Zone Change from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO pursuant to LAMC Section 12.32. Graphics identifying the existing zoning and General Plan land use designations of the Project Site and surrounding properties are provided in Figure IV.F-1 and Figure IV.F-2, respectively. Additionally, the Applicant is requesting a General Plan Land Use Amendment to change the General Plan land use designation from Heavy Manufacturing to Limited Industrial pursuant to LAMC Section 11.5.6. The CM zoning designation corresponds with the Limited Industrial land use designation. The proposed Project would rectify the discrepancy between the existing zoning and General Plan land use designation that currently exist on-site.

Floor Area Ratio

The Project Site's lot area includes a total of 248,190 gross square feet. Pursuant to the LAMC Section 12.2.1, the Project Site has an allowed floor area ratio (FAR) of 1.5 to 1, which equates to approximately 372,285 square feet of allowable floor area. Since the proposed Project would reserve eleven percent of its residential units (excluding density bonus units) as Very Low Income housing units, the proposed Project would be eligible for an on-menu density bonus incentive to increase the maximum allowed FAR by 35 percent and an off-menu density bonus incentive to use lot area as buildable area pursuant to California Government Code Section 65915(f)(3) and LAMC Section 12.22-A,25. Upon approval of these incentives, the maximum allowable floor area on the Project Site would be approximately 502,584 square feet. The proposed Project would develop approximately 487,872 square feet of floor area, resulting in an FAR of approximately 1.97 to 1. Therefore, with approval of the entitlement requests, the proposed Project's proposed uses and floor area would be consistent with the LAMC.

[14] *City of Los Angeles Department of City Planning, Cypress Park & Glassell Park [Q] Conditions CPC-2008-3991-ZC, 2009.*

Density

Pursuant to LAMC Section 12.17.1-A,1, residential land uses that are consistent with the density regulations of the R3 Zone are permitted in a CM Zone. As such, residential uses on the Project Site would be limited to one dwelling unit per 800 square feet (or approximately 310 dwelling units for the Project Site based on a lot area of 248,190 square feet). The proposed Project would reserve 35 units for Very Low Income residents (11 percent of the total units excluding density bonus units), which qualifies the Project for a 35 percent density bonus. With the density bonus, the proposed Project would be allowed to provide 419 residential units within Buildings A, B, C, and D. With approval of the discretionary actions, the proposed Project would be consistent with the permitted density for the Project Site.

Setbacks

Pursuant to the LAMC Section 12.17.1, setbacks for the residential portions of the proposed Project would be required to comply with setback requirements for the R4 Zone with the exception that no front yard setback is required. No front yard setback is required for a CM zone. The R4 Zone requires a minimum of a 5-foot side yard setback with an additional foot added to the width of each side yard for each additional story above the second story. The R4 Zone also requires a minimum of a 15-foot rear yard setback with an additional foot added to the width of the rear yard for each additional story above three stories. Table IV.F-5, provides a summary of the required and proposed setbacks for each building. As summarized in Table IV.F-5, the Proposed Project would be consistent with the yard requirements of the LAMC. The side yards and rear yards are used as a driveway, fire access lane, pedestrian path, bicycle path and landscaping. Therefore, the proposed Project would be consistent with setback requirements for the Project.

**Table IV.F-5**
**Summary of Required and Proposed Building Setbacks**

| Bldg. | Stories | Setback Required | | | Setback Provided | | |
|---|---|---|---|---|---|---|---|
| | | Front | Side | Rear | Front | Side | Rear |
| A | 6 | 0’ | 5’ +4’ = 9’ | 15’ + 3’ = 18’ | 14’ | 34’ | > 350’ |
| B | 5 | 0’ | 5’ +3’ = 8’ | 15’ + 2’ = 17’ | 50’ | 26’ to 37’ | 26’ |
| C | 5 | 0’ | 5’ +3’ = 8’ | 15’ + 2’ = 17’ | > 250’ | 69’ | 26’ |
| D | 5 | 0’ | 5’ +3’ = 8’ | 15’ + 2’ = 17’ | > 250’ | 26’ | 30’ |
| G | 7 | 0’ | 5’ +4’ = 9’ | 15’ + 4’ = 19’ | 228’ | 10’ 1” | > 100’ |
| *Source: Rios Clemente Hale, September 29, 2016.* | | | | | | | |

Height

The Project Site is located in Height District No. 1, which does not impose any height restrictions but limits the development on the Project Site to a 1.5:1 FAR. As discussed above, the proposed Project would be consistent with the FAR requirements with approval of an on-menu density bonus incentive to increase the maximum allowed FAR by 35 percent and an off-menu density bonus incentive to use lot area as buildable area pursuant to California Government Code Section 65915(f)(3) and LAMC Section 12.22-A,25.

Open Space and Landscaping

The proposed Project seeks a vesting zone change and height district change from [Q]PF-1-CDO-RIO that currently exists on the Project Site to a CM-1-CDO-RIO zoning designation across the Project Site for the construction of the proposed mixed-use development pursuant to LAMC Section 12.32-Q. Under LAMC Section 12.21-G, the proposed Project would be required to provide 43,900 square feet of open space. The proposed Project would include a total of 58,176 square feet of open space across the ground level, porch level, and second level. The open space requirements and amount of open space proposed for the proposed Project are summarized in Table II-3 (located in Section II, Project Description). As illustrated in the landscape plans, depicted in Figure II-5 and Figure II-6 (located in Section II), the proposed Project would feature a variety of trees, shrubs, vines, and perennials. Proposed landscaping would also feature a variety of ornamental streetscape and common area landscaping. The proposed Project would include a communal patio, pool deck, lounge seating, outdoor barbeque, and amenity deck. The proposed Project would also include a community room inside Building B. Thus, the proposed Project would meet the residential open space requirements of the LAMC.

Parking

As shown in Table II-4 in Section II, Project Description, the proposed Project would comply with the parking requirements of the LAMC. Since the proposed Project qualifies for a density bonus, the parking requirement for the proposed Project is reduced pursuant to LAMC Section 12.22-A,25(d)(1), which requires one (1) space for each single and one-bedroom unit and two (2) spaces for each two-bedroom unit. The commercial parking ratio for the ground floor restaurant space is based on the Los Angeles Enterprise Zone, which requires two (2) parking spaces per 1,000 square feet for commercial office, business, retail, restaurant, bar, and related uses. Therefore, the LAMC requires a minimum of 627 parking spaces for the residential and commercial land uses of the proposed Project. The proposed Project would provide approximately 720 parking spaces within the proposed parking structure, which includes residential parking spaces and

commercial parking spaces. With a total of 720 parking spaces provided on-site, the proposed Project would be in compliance with the parking requirements of the LAMC. While the proposed Project would provide 93 more spaces than the minimum spaces required by the LAMC, the proposed parking inventory would provide 1.4 spaces per dwelling unit to meet the proposed Project's anticipated parking demand.

The proposed Project would provide bicycle parking in accordance with the City's Bicycle Ordinance. As summarized in Table II-5, Summary of Required and Proposed Bicycle Parking Spaces, provided in Section II, Project Description, the proposed Project would be required to provide 469 bicycle spaces. The proposed Project would provide a total of 469 bicycle parking spaces, which includes 427 long-term bicycle spaces and 49 short-term bicycle spaces. Bicycle parking spaces would be provided on the first level of the parking garage and in outdoor bicycle parking areas. The proposed Project would meet the on-site bicycle parking requirements of the LAMC.

*(x) River Improvement Overlay District*

The Project Site is located adjacent to the Los Angeles River. According to the RIO Ordinance, the Project Site is in the inner core of the RIO District. The RIO Ordinance establishes development regulations for projects within the RIO District. Additionally, the RIO Ordinance establishes the development for accompanying design guidelines; although, these guidelines (Los Angeles River Design Guidelines: Best Practices for "Riverly" Development) are in draft form and have not been formally adopted by the City of Los Angeles.

The proposed Project would comply with the RIO's development regulations. Landscaped areas would be planted with a combination of native trees, plants and shrubs, or species defined as Watershed Wise, or species in accordance with the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. The proposed Project would also provide trees and shrubbery along the northern and eastern property lines. Due to the siting of the parking structure building (Building G), views of the parking structure from Casitas Avenue would be limited to the upper stories. Therefore, the vegetation along the northern property line would provide additional screening of the on-site parking garage. The proposed Project would conceal on-site mechanical equipment and trash areas by providing designated trash rooms and enclosures within each of the proposed buildings. The proposed Project would comply with lighting standards set by the RIO Ordinance, as discussed in Section IV.A, Aesthetics. Additionally, Building B, Building C, and Building D would provide units and commercial uses that would be oriented towards the Los Angeles River corridor. The proposed Project's articulation with the LA River would support future access and pedestrian activity along the LA river corridor in association with future plans under the Los Angeles River Revitalization Master Plan and adjacent

Bowtie Park property located to the south of the Project Site. Additionally, the fire lane area along the southern and eastern property lines would also function as a bicycle path, pedestrian path, and would be landscaped. As such, the proposed Project would support the RIO Ordinance, the Los Angeles River Design Guidelines and the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. A project consistency analysis with the applicable objectives of the Los Angeles River Design Guidelines is presented in Table IV.F-6, below. As discussed in Table IV.F-6, the proposed Project's overall consistency with the applicable objectives of RIO Ordinance and LA River Design Guidelines adopted for the purpose of avoiding or mitigating an environmental effect would help support the LARRMP by promoting sustainable environments and mixed-use projects and guiding development within the RIO District. As such, the proposed Project would also support the LARRMP.

**Table IV.F-6**
**Project Consistency Analysis with Applicable Objectives of the Los Angeles River Design Guidelines**

| Objective | Comments |
|---|---|
| ***Site Planning*** | |
| **Objective 1-1:** Incorporate passageways or paseos into mid-block developments adjacent to the river, to facilitate pedestrian access to the river greenway, such that pedestrians and bicyclists will not need to walk or ride the perimeter of a block in order to access the river. | **No Conflict.** As shown in Figure II-5, Ground Floor Plan and Landscape Plan, in the Section II. Project Description, the proposed Project would provide new contiguous pedestrian and bicycle pathways between buildings A and G (the parking garage) and building B, leading to the commercial restaurants in Buildings B and D. A pedestrian walkway would also be provided along the southern side of Building B to facilitate pedestrian access from Casitas to the restaurant spaces. The proposed pedestrian and bike paths on-site would facilitate a future connection to the LA River corridor should a pedestrian and/or bike path be installed along the eastern bank of the LA River in the future as part of the LARRMP Project and Bowtie Park Project. The proposed residential and commercial uses along the southern portion of the Project Site would be accessible from the proposed public paths along the Los Angeles River. As such the proposed Project would improve pedestrian and cyclist access to the Los Angeles River from Casitas Avenue. Therefore, the proposed Project would not conflict with this objective. |

| Objective | Comments |
|---|---|
| **Objective 1-2:** Activate the passageway or paseo so that they are safe and visually interesting spaces, using recycled water features, pedestrian-level lighting, artwork, benches, landscape, or special paving. | **No Conflict.** The proposed Project would provide pedestrian-scale commercial uses, a bike path, and a pedestrian path linking the Project Site to the Los Angeles River and adjacent Bowtie Park property. Pathways would include features and amenities, such as enhanced landscaping, outdoor patio space with seating, low-level security lighting, permeable pavement with native grasses, and stabilized decomposed granite. The aforementioned features and continuous 24-hour a day presence of residents on the Project Site would promote safety and create visually interesting outdoor spaces along the proposed pathways. As such the proposed Project would not conflict with this objective. |
| **Objective 1-3:** In the setback area, adjacent to the river, establish a courtyard or "outdoor room" incorporating outdoor dining, seating or water features, for example. | **No Conflict.** Ground floor commercial and residential uses along the south side of the Project Site would be accessible from the public paths along the Los Angeles River. Building C would include landscaped courtyards at entrances to the residential uses fronting the Los Angeles River. The proposed Project's central outdoor open space courtyard would be located between portions of Building B and Building C. The retail/restaurant spaces located at the southeast corner of Building B and the southwest corner of Building D would provide outdoor patio space with seating fronting the Los Angeles River. An outdoor amenity deck, located on the second level between Buildings B and C, would provide patio and seating space overlooking the Los Angeles River. The proposed Project would, therefore, not conflict with this objective. |
| ***Building Orientation*** | |
| **Objective 1-4:** Orient the long side of large-format retail to be parallel to the river corridor to physically define the edge of the public greenway. Large format retail buildings with multiple tenants should provide distinct entrances and storefronts to improve site design flexibility for future retail uses at the same location. | **No Conflict.** As shown in Figure II-4, Proposed Plot Plan, in Section II, Project Description, the ground floor retail/restaurant space would anchor the southwest corner of Building D and the southeast corner of Building B, located on the southern portion of the Project Site along the Los Angeles River. Entrances to the aforementioned commercial uses would be accessible from the public pathways. The retail/restaurant spaces associated with Building B and Building D would provide outdoor seating fronting the Los Angeles River. Commercial spaces would be designed to provide flexibility for future retail uses and would, therefore, not conflict with this objective. |

| Objective | Comments |
|---|---|
| ***Entrances*** | |
| **Objective 1-6:** Promote pedestrian connectivity from the river by placing publicly accessible entrances at grade level or slightly above, and unobstructed from view from the river corridor. Avoid sunken entryways below the level of the adjacent river pathways. | **No Conflict.** The proposed Project would promote pedestrian connectivity and access to the Los Angeles River by providing ground floor commercial uses along the southern portion of the Project Site. Entrances to commercial uses would be directly accessible at-grade from the proposed pedestrian and bicycle pathways proposed within the Project Site, which would connect to the future Bowtie Park Project that is planned to the south of the Project Site. Therefore, the proposed Project would not conflict with this objective. |
| **Objective 1-7:** In mixed-use residential, retail, and commercial projects as well as public facilities, ensure that ground floor uses, facing the river, maintain a high degree of transparency and maximize a visual connection to the river by providing clear and unobstructed windows, free of reflective glass coatings and exterior mounted gates or security grills. | **No Conflict.** The proposed Project consists of a mixed-use development consisting of residential, commercial, and retail uses. As shown in Figure II-7, Building C and Building D Elevations – South, of the Project Description, commercial and residential uses fronting the Los Angeles River would include glass windows and doors and would provide a high degree of transparency to maximize a visual connection to the Los Angeles River. Additionally, Project Design Feature AES-PDF-2 would ensure that the proposed Project's façades and windows would be constructed of non-reflective materials. Therefore, the proposed Project would not conflict with this objective. |
| **Objective 1-8:** Provide bicycle lockers and/or racks near river-facing building entrances. | **No Conflict.** The proposed Project would comply with this objective by providing bicycle racks near the entrances of river-facing building entrances for Buildings B, C, and D. Additionally, bicycle parking spaces would be provided on the first level of the proposed parking structure (Building G) and in outdoor bike parking areas. A total of 476 bicycle parking spaces would be provided by the Project in accordance with LAMC requirements. Therefore, the proposed Project would not conflict with this objective. |
| ***Building Façade and Materials*** | |
| **Objective 2-1:** Design the building façade facing the river with the same quality of design, materials, and detail as street-facing facades. Please refer to Objective 2 of the respective Citywide Commercial, Industrial, or Residential Design Guidelines for a full description of the guidelines identified under each of the categories listed above. | **No Conflict.** As discussed above in Table IV.F-7, the proposed Project would be designed and landscaped in accordance with the Cypress Park and Glassell Park CDO Design Guidelines. The proposed Project's architectural design would visually complement the commercial and industrial nature of the surrounding development. The proposed Project would support and promote pedestrian activity in the area. Architectural materials for the proposed buildings would include medium grain finish plaster (stucco), concrete fiber board panel siding, standing seam metal siding, aluminum frame casement windows, aluminum frame sliding doors, aluminum storefront glazing, roll up sectional garage door, glass, painted steel guardrail, louvers, and design features, and cast-in-place concrete. The use of the building materials, façade articulation, and varying building setbacks would add texture and depth to the development. The proposed Project would be designed following CDO's |

| Objective | Comments |
|---|---|
| | standards on building materials and design and would, therefore, not conflict with this objective. |
| ***River Paths*** | |
| **Objective 3-1:** On projects where a river pathway does not exist, work with the Los Angeles County Flood Control District and the City's River Project Office to establish a publicly accessible greenway, where feasible, within the public-right-of-way along the length of the property adjacent to the river. The path design may include trees, lighting, and site amenities such as trash receptacles, benches, drinking fountains and bike racks. Lighting, trees, and other site amenities should be selected from the Los Angeles County's River Master Plan Landscape Guidelines and Plant Palettes. | **No Conflict.** As shown in Figure II-5, Ground Level Floor Plan and Landscape Plan, in Section II, Project Description, the proposed Project would provide new contiguous pedestrian and bicyclist connectivity from Casitas Avenue to the proposed Bowtie Park Project. As shown in Figure II-5, the proposed bike trail on-site would connect from the existing maintenance road (that is used by pedestrians as well) on its southwest end, run along the south and east sides of the Project Site, and ultimately connect to Casitas Avenue on its northeast end. The proposed residential and commercial uses along the southern portion of the Project Site would be directly accessible from the proposed pathways along the Los Angeles River. Pathways would include features and amenities, such as enhanced landscaping, outdoor patio space with seating, low-level security lighting, and permeable pavement with native grasses and stabilized decomposed granite. Additionally, landscaping on the Project Site would be designed in accordance with the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Landscaped areas would be planted with a combination of native trees, plants and shrubs, or species defined as Watershed Wise, or species listed in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Therefore, the proposed Project would not conflict with this objective. |
| ***Views*** | |
| **Objective 3-2:** Create view opportunities to and from the river. | **No Conflict.** Development of the proposed Project would allow for views to and from the Los Angeles River from the proposed pedestrian and bicycle pathways along the southern edge of the Project Site and from Buildings B, C and D, which front the Los Angeles River. Buildings A and G, located on the northern portion of the Project Site, would provide limited views of the Los Angeles River. Additionally, commercial uses along the south side of the Project Site would provide outdoor patio space with seating fronting the Los Angeles River. An outdoor amenity deck, located on the second level between Buildings B and C, would provide patio and seating space overlooking the Los Angeles River. Therefore, the proposed Project would not conflict with this objective. |
| **Objective 3-3:** Preserve visual access to existing landmarks and overlooks within view corridors. | **No Conflict.** Aside from views of the Los Angeles River, there are no prominent viewsheds of existing landmarks or overlooks to preserve within the Project Site. Due to development along Casitas Avenue, there are no existing views of the Los Angeles River from the public right-of-way (i.e., Casitas Avenue). Views of the surrounding area are depicted in Figures IV.A-5 and IV.A-6. Therefore, the proposed Project would not conflict with this objective. |

| Objective | Comments |
|---|---|
| ***Pocket Parks*** | |
| **Objective 3-4:** Where feasible, provide and improve a public easement adjacent to the river path as a pocket park, community garden or other public space. | **No Conflict.** The proposed Project would provide a bike and pedestrian path on-site linking the Project Site to the Los Angeles River and future Bowtie Park Project Site to the south. On-site pathways would include features and amenities, such as enhanced landscaping, outdoor patio space with seating, low-level security lighting, and permeable pavement with native grasses, and stabilized decomposed granite. Although the Project would not involve any improvements to or within public easements, the proposed Project would facilitate public access along the southern perimeter of the site should future accessways be provided. As such, the proposed Project would not conflict with this objective. |
| ***On-Site River Adjacent Parking*** | |
| **Objective 4-1:** Place on-site parking so that it does not dominate the river corridor. | **No Conflict.** The parking structure (Building G) would be located along the northern property line and would, therefore, not dominate the river corridor. Buildings B, C, and D would limit views of the parking structure to the upper stories from the proposed pathways located to the south of the Project Site along the Los Angeles River. Additionally, the seventh level of the parking structure would be used as an urban farm. As such, the parking structure's most readily seen level from public pathways fronting the Los Angeles River would not contain automobile parking. Therefore, the proposed Project would not conflict with this objective. |
| ***River Adjacent Loading*** | |
| **Objective 4-2:** Locate loading facilities so that docks and doors do not dominate the river frontage and are screened from the river. | **No Conflict.** Loading areas would be located at the northeast corner of the Building A and between Building C and D. As such, loading facilities would not dominate the river frontage and would generally be screened from public pathways along the Los Angeles River. Therefore, the proposed Project would not conflict with this objective. |
| **Objective 4-3:** Situate loading areas so as not to interfere with on-site pedestrian and bicycle circulation to and from the river corridor. When feasible, separate loading areas from areas that are used for public entrances. | **No Conflict.** Loading areas would be located at the northeast corner of the Building A and between Building C and D (see Figure II-4, Proposed Plot Plan, in Section II, Project Description, of this Draft EIR). As such, loading areas would not interfere with the proposed primary public pathway connecting Casitas Avenue to the Los Angeles River or public entrances to the proposed buildings and the proposed Project would not conflict with this objective. |
| ***Shared Parking*** | |
| **Objective 4-4:** Encourage shared parking agreements to minimize the amount of area dedicated to parking. | **No Conflict.** The LAMC requires a minimum of 627 parking spaces for the residential and commercial land uses of the proposed Project and the proposed Project would provide approximately 720 parking spaces within the proposed parking structure, which would provide 93 more spaces than required by the LAMC. The commercial spaces could be used by residential guests on weekends and evenings when the commercial uses are not operating. Although the amount of parking spaces exceeds the minimum number of spaces |

| Objective | Comments |
|---|---|
| | allowed by the LAMC, the shared parking between uses is proposed to meet the proposed Project's anticipated parking demand at peak parking times. As such, the proposed Project would not conflict with this objective. |
| ***Green Streets*** | |
| **Objective 5-1:** Design cul-de-sacs, street ends, vacated streets, and remnant street width to provide pocket parks which can serve as gateways to the river while also assisting in the treatment and infiltration of stormwater as well as dry-weather run-off. | **No Conflict.** The Project Site would be designed to manage and capture stormwater runoff utilizing various LID Ordinance techniques, including, but not limited to, infiltration, evapotranspiration, capture for use, high efficiency bio-filtration, retention systems, and Best Management Practices (BMPs). The proposed Project would also comply with water quality standards and wastewater discharge requirements set forth by the SUSMP for Los Angeles County and Cities in Los Angeles County and approved by the LARWQCB. Therefore, the proposed Project would not conflict with this objective. |
| **Objective 5-2:** Design parkways and traffic circles to assist in the treatment and infiltration of stormwater as well as dry-weather runoff. See the City's Green Street Standard Plans for reference. | **No Conflict.** While this policy is applicable to public infrastructure, the proposed Project includes one restricted access fire lane through the Project Site, and pedestrian/bike paths with landscaping features along the perimeter. The Project Site as a whole would be designed to manage and capture stormwater runoff to the maximum extent feasible utilizing various LID Ordinance techniques, including, but not limited to, infiltration, evapotranspiration, capture for use, high-efficiency bio-filtration, retention systems and BMPs. Therefore, the proposed Project would not conflict with this objective. |
| *Source: City of Los Angeles, Department of City Planning, Los Angeles River Design Guidelines: Best Practices for 'Riverly' Development, Draft, July 29, 2015* | |

### *(xi) Cypress Park and Glassell Park CDO*

The establishment of the Cypress Park and Glassell Park CDO District included zone changes in the CDO District and Design Guidelines and Development Standards. The proposed Project is zoned [Q]PF-1-CDO-RIO and has a land use designation of Heavy Manufacturing. The current zoning and land use designation on the Project Site do not correspond with one another. The Project proposes a zone change to [Q]CM-1-CDO-RIO and a land use designation change to Limited Industrial, which would rectify the discrepancy between the on-site zoning and land use designation that currently exist on-site.

The "Q" condition, which is currently in effect on the Project Site, limits and/or prohibits a variety of automobile-related uses, drive-through establishments, commercial shipping, electronic message display signs or similar signs where content is displayed electronically, lumber stores and yards, new public storage facilities, pole and pylon signs,

equine or motorcycle sales, and recreational vehicle park. Although the proposed Project would be changing the zoning and land use designation on-site, the proposed Project would retain the Q condition limitations imposed in Sub Area No. 40 of Ordinance No. 181,062 that prohibits and/or limits various land uses within the Cypress Park & Glassell Park CDO.

Additionally, as further discussed in Table IV.F-7, below, the proposed Project would support the design regulations and standards set by the CDO Design Guidelines and Development Standards adopted for the purpose of avoiding or mitigating an environmental effect. The proposed Project's architectural design would visually complement the commercial and industrial nature of the surrounding development. The proposed Project would be well-designed and landscaped and support and promote pedestrian activity in the area by providing a pedestrian connection from Casitas Avenue through the site to access the proposed neighborhood-serving commercial land uses. Therefore, the proposed Project would be consistent with development within the CDO District.

**Table IV.F-7**
**Proposed Project Consistency with the Cypress Park and Glassell Park Community Design Overlay Design Guidelines and Development Standards for Multi-Family Residential Land Uses**

| Guidelines and Development Standards | Consistency Analysis |
|---|---|
| ***Guideline 1:*** Encourage an inviting pedestrian environment and provide for street wall continuity by locating buildings with a consistent setback, orienting building to the street and providing pedestrian amenities along the front of buildings. Site plans that fortify individual projects rather than connect them to the street are strongly discouraged. | **No Conflict.** The Project Site is generally isolated from the surrounding community with existing barriers, such as the railway to the northeast of the Project Site, the Los Angeles River to the south of the Project Site, and SR-2 to the west of the Project Site. Pedestrian activity in the Project Site area is provided by the LADWP maintenance road to the south of the Project Site, Casitas Avenue, and the vacant Bowtie Park Project area to the south of the Project Site.<br><br>The proposed Project would increase residential amenities on the Project Site and introduce pedestrian access and amenities to the Project Site area. The proposed Project would provide pedestrian-scale commercial uses, a bike lane, and a pedestrian path linking the Project Site to the Bowtie Park Project area, which is used for artist's projects, performances, and events. The proposed Project would emphasize connections to existing pedestrian access ways and promotes pedestrian activity around and on the Project Site. The proposed Project would not conflict with this guideline. |
| ***Standard 1b:*** Provide a prominent pedestrian entrance with a walkway that | **No Conflict.** The Project Site is located at the terminus of Casitas Avenue. Therefore, only the northeastern corner |

| Guidelines and Development Standards | Consistency Analysis |
|---|---|
| leads directly from the entrance to the street. | of the Project Site fronts a public street. A street easement from Casitas Avenue would extend street access along the northeastern corner of the Project Site to a full access driveway to the parking structure on-site, a loading area, emergency vehicle access, and bike lane access. Access to the buildings would be provided interior to the Project Site and open to outdoor pedestrian areas, walkways, and landscaped areas. Therefore, the proposed Project would not conflict with this standard. |
| ***Standard 1c:*** Where projects have multiple residential units at ground level, individual entrances are encouraged. | **No Conflict.** Buildings B through D would include ground floor residential units. To provide articulated building entrances, the ground floor residential units in Buildings B through D involve different designs to provide entrances from the interior and from the outdoor courtyard areas. A portion of the ground floor residential units would face outward toward the Los Angeles River and future Bowtie Park Project, and would include individual access from the ground level courtyard. These units would also have another access interior to the building. Therefore, the proposed Project would not conflict with this standard. |
| ***Guideline 2:*** Encourage the use of open surface for open space, landscaping and recreation areas by minimizing surface parking and by providing adequate separation between existing and new structures. | **No Conflict.** The proposed Project would include five buildings, in which Building G includes a seven-story mixed-use parking structure that would provide parking for all the uses on-site. An emergency lane would traverse the Project Site and would be limited to emergency vehicles. Street parking would not be provided or allowed on-site. As discussed under Guideline 1, the proposed Project would be designed to emphasize pedestrian activity on-site. The proposed Project would be well-landscaped (in accordance with the RIO Ordinance), would include a publicly accessible bike path and pedestrian path and would provide open space and amenity areas for residents. The proposed Project would not conflict with this guideline. |
| ***Standard 2a:*** Open space yard areas and courtyards with a minimum dimension of 15 feet are encouraged between existing structures and new structures on the same parcel. | **No Conflict.** Except when on-site buildings immediately abut one another, landscaping and paths would separate buildings on-site. Additionally, the proposed Project's central outdoor open space courtyard would be located between portions of Building B and Building C (see Figure II-4, Proposed Plot Plan, of Section II, Project Description, of this Draft EIR). Therefore, the proposed Project would not conflict with this standard. |
| ***Guideline 3:*** Parking areas and the driveways that accompany them can contribute to a cluttered appearance and can diminish the pedestrian livelihood of a street. Such areas should be kept out of view from the public street to the greatest extent possible. | **No Conflict.** Vehicular access to the Project Site would be limited to one driveway that would lead to the seven-story parking structure on-site. As shown in Figure II-4, Proposed Plot Plan, the parking structure (Building G) is located along the northern property line and is adjacent to the west side of Building A. Views of the parking structure from Casitas Avenue would be limited to the upper levels of the building, which would be the enclosed urban farm due to existing development north of the Project Site and Building A. Additionally, Buildings B, C, and D would also limit views of the parking structure to the upper stories |

| Guidelines and Development Standards | Consistency Analysis |
|---|---|
| | from the maintenance road to the south of the Project Site. The maintenance road, although not a public street, is used as a pedestrian path by the surrounding community. The seventh level of the parking structure would be used as an urban farm. Therefore, the parking structure's most readily seen level from public areas would not contain automobile parking. The parking structure would generally be kept out of view from existing public rights-of-way. Therefore, the proposed Project would not conflict with this guideline. |
| ***Standard 3a:*** Driveways within the front yard area should be no wider than 15 feet unless additional width is needed to accommodate entry ramps into subterranean parking areas. | **No Conflict.** As discussed above, the Project Site is located at the terminus of Casitas Avenue, and vehicular access is limited to this street. As such, the Project Site's connection with Casitas Avenue would largely be used for vehicular access to the Project Site, including a full access driveway to the parking structure on-site, a loading area, emergency vehicle access, and bike lane access. As such, the proposed Project would not conflict with this standard. |
| ***Standard 3b:*** Parking areas should be located underground, at the rear of properties, or at other suitable locations that are not visible from the public street. Multiple garage bays along the front of a building should be avoided. Surface parking areas and driveway "back-up" space between a structure and the public street (regardless of setback requirements) are prohibited. | **No Conflict.** Parking for the proposed Project would not be underground and would instead be provided in a seven-story above-grade parking structure. Views of the parking structure from public rights-of-way would be limited because of the building's position on the Project Site and the siting of Buildings A through D. The mixed-use parking structure's seventh level, which would be the most readily seen level from public rights-of-way, is an enclosed rooftop greenhouse structure and would be used as a commercial urban farm. No vehicles would be parked on the seventh level. Additionally, the Project Site would only provide one ingress/egress driveway leading to the parking structure. As such, the proposed Project would not conflict with this standard. |
| ***Guideline 3*** *(sic):* The overall scale of all buildings should maintain existing heights and massing patterns on streets where a consistent pattern exists. A building that is larger than its neighbors can still be in scale and be compatible with the smaller buildings in the area through façade articulations and through setbacks to upper floors. In other cases, it may be necessary to reduce the height or bulk of the building. | **Not Applicable.** The Project Site is located at the terminus of Casitas Avenue and is immediately bordered by a self-storage facility that ranges in height from one to two stories. This property includes the only buildings immediately adjacent to the Project Site. As such, there are no existing height and massing patterns on Casitas Avenue. Thus, this guideline does not apply to the proposed Project. |
| ***Standard 3a*** *(sic):* Where the height of a building would be inconsistent with the height of adjacent buildings as viewed from the street, upper-floor stepbacks should be used to adequately maintain the appearance of a prevailing height. A minimum 15-foot stepback of upper floors from the building front is recommended | **Not Applicable.** As discussed above, the proposed Project is generally isolated from the surrounding neighborhood. Buildings on the adjacent self-storage facility property include one and two stories structures. However, because the terminus of Casitas Avenue at the Project Site visually is isolated from other properties, there is no height established pattern within the proposed Project area. |

| Guidelines and Development Standards | Consistency Analysis |
|---|---|
| when new buildings or additions will be a full floor higher than adjacent structures. | |
| ***Standard 3b*** *(sic):* Where the massing of a building would be inconsistent with the massing of adjacent buildings as viewed from the street (for instance where a building would be two or three times the width of neighboring buildings), articulation and setbacks should be used to recreate existing massing patterns on the street to the greatest extent possible. | **No Conflict.** The proposed building setbacks and façade articulation would break up the proposed Project's massing. The proposed Project would provide a minimum 10'-1" side yard setback from Building G along the northerly property line, a minimum 14'-2" front yard setback from the easterly property line fronting Building A, a minimum 37'-1" side yard setback from the easterly property line adjacent to Building B, and a minimum 30'-2" rear yard setback from the southerly property line adjacent to Buildings C and D. The use of the varying building materials, façade articulation, and varying building setbacks would add texture and depth to the development. As such, the proposed Project's contemporary industrial-inspired design would aim to complement the surrounding area and the proposed Project would not conflict with this standard. |
| ***Guideline 4****:* Buildings should be composed of a rich variety of forms and contrasting shapes that will provide depth and texture and will avoid the appearance of monotonous architecture. | **No Conflict.** As shown in Figure II-4, Proposed Plot Plan, the proposed mixed-use project is comprised of seven individual buildings. Building A is 80 feet in height, Building G is 85 feet in height, and Buildings B, C and D are 60 feet in height. Building G and Building A are located along the northern property line and have differentiating building setbacks from the northerly property line. Building B, located south of Building A and Building G, is "V" shaped and oriented on the eastern portion of the Project Site. Building C connects to Building B along the southern property line, but the structures are distinguished by differentiating roof lines. As shown in Figure II-15, Landscape Exterior Elevations, Building B has a flat roof line and Building C has a series of A-frame roof tops. The façade treatments on Buildings B and C are also different. Building D, which is situated adjacent to Building C along the southern property line, is separated at the ground level by a pedestrian walkway. Additionally, an outdoor courtyard area is provided on the ground floor between Building B and Building C. The siting of the proposed buildings complement each other and create a cohesive environment. As shown in Figure II-13, Illustrative Renderings, the siting of the proposed buildings, façade articulation, and architectural materials avoid the appearance of monotonous architecture. Therefore, the proposed Project would not conflict with this guideline. |

| Guidelines and Development Standards | Consistency Analysis |
|---|---|
| ***Standard 4a:*** At minimum, all exterior building elevations should provide a break in the plane every 20 feet in horizontal length and every 15 feet in vertical length, created by a change in plane, architectural detail or a change in material. Windows or doors that are flush with the plane of the building and exterior hallways and stairwells shall not constitute a change in material or break in the plane.<br><br>***Standard 4b:*** Rooflines should include articulation that corresponds to articulation found on the building façade. At minimum rooflines that exceed 40 feet shall provide articulation in the form of vertical changes in plane or variation in roof types. | **No Conflict.** The proposed Project includes the use of various architectural materials and façade articulation to create a dynamic environment. As shown in Figure II-11, in Section II, Project Description, the south elevation of Buildings B, C, and D (facing the future Bowtie Park property and Los Angeles River) would be articulated with architectural setbacks, stepbacks, and overhanging projections that break the plane every 20 feet in horizontal length and every 15 feet in vertical length. As shown in Figure II-7 through Figure II-12, the proposed Project's rooflines would vary between heights and materials to show vertical changes in plane roof types for the south and west elevations. Therefore, the proposed Project would not conflict with these standards. |
| ***Standard 4c:*** Outdoor hallways and stairwells are generally discouraged and if used should be integrated into the overall structure through facades, materials and a cohesive architectural strategy. | **No Conflict.** While the proposed Project does not propose any outdoor hallways, it does propose outdoor stairwells on all five buildings, which would complement the proposed buildings' modern design. The outdoor stairs would further enhance the look of the architectural steel structures throughout the proposed Project. Therefore, the outdoor stairs would be integrated and complement the overall architectural design and the proposed Project would not conflict with this guideline. |
| ***Guideline 5:*** Buildings should have meaningful fenestration that establishes a clear pattern on the façade (with special attention paid to facades that are visible from the street) and that provide depth and additional articulation. Openings such as doors and windows should not be designed as an after-thought once the floor plan of a structure has been established, but rather should serve as an integral part in how the building relates to both the public and private realm. | **No Conflict.** The proposed Project's modern design would be consistent with surrounding development and would be compatible with the surrounding area's substantially commercial and manufacturing land uses. The proposed Project's façade fenestration would follow a coherent style and would be appropriate for the Project's modern design. The proposed Project would be designed consistent with the CDO's standards on façade fenestration with doors and windows oriented towards the public spaces toward the south and west. Therefore, the proposed Project would not conflict with this guideline. |
| ***Guideline 6:*** Building materials should be varied and should reflect a high level of quality and craftsmanship. The use of varied materials adds texture and depth to a façade and assists in providing needed articulation. Where specific building materials are found in abundance on a street front, such as wood siding or river rock, such materials should be incorporated into the façade of new buildings. | **No Conflict.** Architectural materials for the proposed buildings include medium grain finish plaster (stucco), concrete fiber board panel siding, standing seam metal siding, aluminum frame casement windows, aluminum frame sliding doors, aluminum storefront glazing, roll up sectional garage door, glass, painted steel guardrail, louvers, and design features, and cast-in-place concrete. The use of the building material, façade articulation, and varying building setbacks would add texture and depth to the development. The proposed Project would be designed consistent with the CDO's standards on building materials. Therefore, the proposed Project would not conflict with this guideline. |

| Guidelines and Development Standards | Consistency Analysis |
|---|---|
| ***Guideline 5*** *(sic):* Emphasize pedestrian orientation and accessibility by creating well-articulated, inviting building entrances and by orienting building entrances toward the street. | **No Conflict.** As discussed under Guideline 1, the proposed Project would create a pedestrian-oriented and well-articulated mixed-use development. Refer to the discussion under Guideline 1. |
| ***Standard 5a:*** Orient primary entrances toward the street. Emphasize entrances through architectural features such as front porches, awnings, columns and/or prominent walkways. | **No Conflict.** Primary entrance to the Project Site would be provided off of Casitas Avenue. The proposed buildings would include multiple building entrances consistent with Standard 1c. Building entryways are generally oriented around the periphery of the entire site as the ground floor residential uses are designed to look out on the LA River frontage and future Bowtie Park property to the south. Therefore, the proposed Project would not conflict with this standard. |
| ***Standard 5b:*** Where multiple ground level entrances exist, individual building entrances should be architecturally emphasized according to Standard 5a. | **No Conflict.** The proposed buildings would include multiple building entrance styles to match the respective land uses being proposed. Entrances to commercial uses would include aluminum frame and glass doors. Residential entrances would be available from the outdoor courtyard and would include aluminum frame and glass doors and sliding doors. Therefore, the proposed Project would not conflict with this standard. |
| ***Guideline 8:*** In addition to aesthetic benefits, landscaping provides shade, reduces glare and minimizes surface runoff during rainy periods. Projects should provide landscaping that complements existing architecture, provides shade to pedestrian areas and that provides a high level of surface permeability. | **No Conflict.** Primary entrance to the Project Site would be provided off of Casitas Avenue. The proposed buildings would include multiple building entrances consistent with Standard 1c. Building entrances would be consistent with the overall style of the proposed buildings. Entrances to commercial uses would include roll up sectional garage doors and aluminum frame and glass doors. Residential entrances would be available from the outdoor courtyard and would include aluminum frame and glass doors and sliding doors. The proposed Project would be well-landscaped in accordance with the RIO Ordinance. Additionally, the proposed Project would be required to comply with the Low Impact Development (LID) Ordinance, which requires the capture and treatment of the first ¾ inch of rainfall in a 24-hour period of the rainfall from an 85$^{th}$ percentile 24-hour runoff event (whichever is greater).<br><br>The proposed Project would also comply with water quality standards and wastewater discharge requirements set forth by the Standard Urban Stormwater Mitigation Plan (SUSMP) for Los Angeles County and Cities in Los Angeles County and approved by the Los Angeles Regional Water Quality Control Board (LARWQCB). Therefore, the proposed Project would not conflict with this guideline. |

| Guidelines and Development Standards | Consistency Analysis |
|---|---|
| ***Standard 8:*** Projects shall comply with the City Landscape Ordinance and the accompanying Guidelines. | **No Conflict.** The Project Site is located within the RIO District and would provide landscaping in accordance with the RIO Ordinance, which supersedes the Citywide landscape ordinance for the RIO overlay. Therefore, the proposed Project would not conflict with this guideline. |
| ***Guideline 9:*** Front yard and outdoor spaces such as common and private open space should be developed to an extent that encourages use and enhances the livability of residential structures. | **No Conflict.** As discussed under Guideline 1, the proposed Project would be designed to emphasize pedestrian activity and outdoor residential activity on-site. The Project would provide outdoor residential amenity areas and would be well-landscaped throughout the proposed development. Building C would include landscaped courtyards at entrances to the residential uses fronting the Los Angeles River. Thus, the proposed Project would not conflict with this guideline. |
| ***Standard 9a****:* All projects shall comply with the Open Space Requirements listed in Section 12.21 G of the LAMC. All subsequent Standards shall enhance those requirements found within the LAMC. | **No Conflict.** Pursuant to the LAMC Section 12.21-G,2, the proposed Project would be required to provide 43,900 square feet of open space on-site for Project residents. The proposed Project would provide approximately 58,176 square feet of outdoor open space and residential amenities. As such, the proposed Project is consistent with LAMC Section 12.21-G,2. The proposed Project would not conflict with this standard. |
| ***Standard 9b****:* Utilize drought tolerant plant species within required open space areas to the greatest extend possible. | **No Conflict.** Landscaping on the Project Site would be designed in accordance with the RIO Ordinance. The RIO Ordinance indicates that 75 percent of any newly landscaped area shall be planted with any combination of native trees, plants and shrubs, or species defined as Watershed Wise, or species listed in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. With adherence to the RIO Ordinance, the proposed Project would not conflict with this standard. |
| ***Guideline 10:*** Front yards provide for transition between the public right of way and the residential building. Front yard areas should remain open and used for landscaping and passive recreation space. In order to maintain a consistent streetwall, avoid the appearance of clutter and minimize excessive surface water runoff during rainy seasons. [M]assive fences, parking areas and excessive paving should be avoided in the front yard area. | **No Conflict.** Casitas Avenue is the only street in the vicinity of the Project Site. Due to the Project Site's limited frontage on Casitas Avenue, the majority of the front yard consists of the driveway easement for site access. A landscaped area is provided next to the main access point. There is no predominant streetwall in the vicinity, and the Project Site is largely isolated from the surrounding neighborhood due to SR-2, a railway, and the Los Angeles River. The proposed Project would not include massive fencing and street parking on the Project Site. Landscaping would be provided throughout the Project Site, including along the Project Site's southern and eastern property lines, which border the Bowtie Park property and the Los Angeles River. As such, the proposed Project would be consistent with this standard. |

| Guidelines and Development Standards | Consistency Analysis |
|---|---|
| ***Standard 9a*** *(sic):* Develop front yards with a prominent front walkway that leads directly from the sidewalk to the pedestrian entrance. Walkways should be improved with stamped concrete, brick, tile, stone or other such decorative surfaces. | **No Conflict.** Due to the Project Site's limited frontage on Casitas Avenue, the front yard area would be used primarily for site access. The front yard would be developed with one full access driveway, an emergency access lane, and loading area. The fire lane, pedestrian walkways, and bike paths would be improved with grasscrete. A bicycle path would lead from Casitas Avenue and would provide pedestrian and bicycle access throughout the Project Site and would connect to future pedestrian and bike paths proposed as part of the LA River Revitalization Master Plan and the future development of the Bowtie Park property. Thus, the proposed Project would not conflict with this standard. |
| ***Standard 9b*** *(sic):* Paving surfaces should be provided exclusively for driveways and walkways. Parking areas located between the front of a structure and the front property line (regardless of setback requirements) and paving of front yards not used for driveways and walkways is inappropriate. | **No Conflict.** Paving surfaces would be provided for driveways and walkways. Parking would be provided within a stand-alone seven-level parking structure on Levels 1 through 6. As such, no parking would occur between the front of any structure and the front property line. Thus, the proposed Project would not conflict with this standard. |
| ***Guideline 10*** *(sic):* Trash enclosures should be designed so that trash and recycling bins are not visible to the general public. | **No Conflict**. Trash and recycling receptacles for the proposed Project would be provided in enclosed trash rooms inside Buildings A, B, C, and D. The trash rooms would not be visible to the general public. Thus, the proposed Project would not conflict with this guideline. |
| *Source: City of Los Angeles Department of City Planning, Cypress Park and Glassell Park Community Design Overlay Design Guidelines and Development Standards, April 2009.*<br>*Parker Environmental Consultant, 2018.* | |

### *(xii) Zoning Information*

East Los Angeles Enterprise Zone / Employment and Economic Incentive Program Area (ZI No. 2129)

Consistent with development within an Enterprise Zone, the proposed Project would provide vehicular parking for its proposed 64,000 square feet of commercial floor area at a ratio of one parking spot per 500 square feet. The proposed Project would be consistent with the East Los Angeles Enterprise Zone (ZI No. 2129).

Metro Rail Project Area (ZI No. 1117)

ZI No. 1117 indicates that prior to the issuance of any building permit within 100 feet of the Metro Rail construction area, a development project must obtain clearance from Metro. Development of the proposed Project would coordinate with Metro to obtain

necessary clearance. As noted in Metro's response letter to the NOP, the project Applicant will be required to notify Metro and SCRRA of any changes to the construction or building plans that may or may not impact the right-of-way.

Freeway Adjacent Advisory Notice for Sensitive Uses (ZI No. 2427)

ZI No. 2427, effective September 17, 2018, is an advisory notice to applicants for discretionary land use requests regarding new and/or expanded projects within 1,000 feet of a freeway. ZI No. 2427 applies to all projects within 1,000 feet of freeways and provides a disclosure statement informing Applicants of a strong link between the chronic exposure of populations to vehicle exhaust and particulate matter from roads and freeways and elevated risk of adverse health impacts, particularly in sensitive populations such as young children and older adults. Areas located within 500 feet of a freeway[15] are known to experience the greatest concentrations of fine and ultrafine particulate matter (PM), a pollutant implicated in asthma and other health conditions. In 2003, the California Legislature enacted SB 352, which precludes the siting of public schools within 500 feet of a freeway, unless it can be shown that any significant health risk can be mitigated.

ZI No. 2427 identifies project design alternatives that if integrated into the project design may help to reduce or address impacts and public health risks associated with the placement of sensitive land uses near freeways and specifies that discretionary approvals for which findings must be made regarding conformance to the General Plan are expected to adhere to the Citywide Design Guidelines, including those that address freeway proximity. ZI No. 2427 also notes that as part of the Clean Up Green Up initiative, the City Council amended Articles 5 and 9 of Chapter IX of the LAMC addressing sources of outside air in buildings and requires all new mechanically ventilated buildings located within 1,000 feet of the freeway to install air filtration media that provides a Minimum Efficiency Reporting Value (MERV) of 13 (Ordinance 184245).

The Project Site is within 1,000 feet of SR-2, which is located to the west and north of the Project Site, and as such, the proposed Project is subject to the advisory notice and recommendations contained in ZI No. 2427. While recent court rulings have found that CEQA does not require an analysis of the impacts of the environment on a project, the SCAQMD and the City Planning Commission continue to recommend that, prior to the approval of a project, the impacts of air pollutants on people who would live in a new project are addressed and appropriately mitigated to the extent feasible. As discussed in further detail below, the proposed Project would comply with ZI No. 2427 and install MERV 13 Heating, Ventilation, and Air Conditioning (HVAC) systems in all residential

[15] *Freeway, as defined in the Caltrans Highway Design Manual – Chapter 60, pg. 60-2: (May 7, 2012) "Freeway--A divided arterial highway with full control of access and with grade separations at intersections."*

dwelling units on-site as required by Section 99.04.504.6 of the LAMC for all regularly occupied buildings within 1,000 feet of the freeway. Therefore, the proposed Project would be consistent with ZI No. 2427.

Additionally, for informational purposes, a project-specific HRA was prepared to quantify the localized health risks associated with freeway emissions. The HRA assesses the carcinogenic and non-carcinogenic risks attributable to exposure to poor ambient air quality emissions in proximity to SR-2 based on site-specific characteristics, including, but not limited to, local freeway volume data, vehicle emission factors, local meteorological data, dispersion modeling, and carcinogenic and non-carcinogenic health risk calculations for exposure to toxic air contaminants. Based on the findings in the HRA, the Project Site's worst-case ground level location would be exposed to carcinogenic risks below 10 per one million for the 9-year and 30-year residential scenarios, all acute and chronic health hazard indices would be under the SCAQMD recommended threshold of 1.0, and all criteria pollutants would be below the ambient air quality state and national standards. As such, no special project design features are warranted for the Project. Nevertheless, as required by the LAMC, the Project will include air filtration systems with filters meeting or exceeding the MERV rating of 13 pursuant to LAMC Section 99.04.504.6 for new ventilated buildings within 1,000 feet of a freeway (Ordinance No. 184,245). As such, the Project would be consistent with the City of Los Angeles Planning Commission ZI No. 2427 and the LAMC.

Recognizing the inherent conflict associated with localized health risks attributable to siting residential land uses in close proximity to freeways and the public health, climate, financial, and other benefits of compact, infill development along transportation corridors, CARB published a technical advisory outlining strategies to reduce air pollution exposure near high-volume roadways.[16] Identifying the benefits of compact, infill development, CARB's technical advisory acknowledges that infill and compact development patterns have many benefits, including, but not limited to, (1) promoting physical activity by facilitating active transportation (biking and walking) and by shortening the distances that people must travel for their daily activities, (2) provides density of development that helps support transit operations, (3) improves people's quality of life by facilitating community connectivity between residential and neighborhood-serving commercial land uses. Vehicle trips that are shortened or replaced by alternative modes of transportation (such as walking, biking, and public transit) result in greenhouse gas (GHG) emissions reductions. GHGs are further reduced in these communities because they are also associated with reduced energy and water use. Additionally, compact infill development is encouraged by the 2016-2040 RTP/SCS and transportation planning in accordance

[16] *CARB, Research Division, Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways, April 2017.*

with Senate Bill (SB) 375. The foremost strategy for reducing pollution exposure near high-volume roadways is to minimize traffic pollution in the first place. A key mechanism for this is the reduction of VMT. State legislation, including Senate Bills 375 and 743, is specifically designed to facilitate VMT reductions from passenger cars by encouraging and facilitating the replacement of vehicle trips with walk, bike, and transit trips.

CARB's technical advisory identifies a number of strategies to reduce air pollution exposure near high-volume roadways. Table IV.F-8, Strategies to Reduce Air Pollution Near High Volume Roadways, identifies a number of applicable strategies recommended by CARB to reduce air pollution exposure near freeways that are incorporated into the project by design features, code compliance measures, or are otherwise reflected by features of the project's environmental setting. This table presents those strategies that have been determined to be applicable to the proposed Project. As noted in Table IV.F-6, the Project would be consistent with several effective strategies to reduce future resident's exposure to poor ambient air quality. As such, impacts associated with developing residential land uses in close proximity to a freeway would be considered less than significant.

**Table IV.F-8**
**Strategies to Reduce Air Pollution Near High Volume Roadways**

| Strategy [a] | Description of Research Findings [a] | Project Analysis |
|---|---|---|
| ***Strategies that increase dispersion of traffic emissions*** | | |
| Design that promotes air flow and pollutant dispersion along street corridors. | The physical layout of urban streetscapes influences airflow and pollution movement. Research studies show that street corridors characterized by buildings with varying shapes and heights, building articulations (street frontage design elements like edges and corners that help break up building mass), and spaces that encourage air flow (e.g., parks) benefit from better pollutant dispersion and air quality. For example, buildings of varying heights can result in significant increases in turbulence (e.g., up to doubling), and adding bike lanes and sidewalks not only reduces car traffic, but also creates space for more dispersion (up to a 45 percent reduction in particulate concentrations). | **No Conflict.** The Project's residential buildings are separated, in part, from the freeway by the existing self-storage facility. Additionally, the Project's seven-story parking structure with an urban farm on the roof level is located on the north side of the proposed Project, closest to the freeway. This building would increase the distance between residential units and the freeway and would increase turbulence of downwind airflow. The building heights and physical layout of Buildings A through D would also promote airflow between buildings. Therefore, the proposed Project would not conflict with this strategy. |

| | | |
|---|---|---|
| Solid barriers, such as sound walls | Measurement and modeling studies consistently find that solid barriers reduce near-road downwind concentrations by increasing vertical dispersion of pollutants emitted by vehicles. The magnitude of the reduction and its spatial extent depend on the height of the barrier, the width of the road, and micrometeorology. Studies have consistently found that pollution concentrations downwind of the barrier range from a 10 percent to 50 percent reduction compared to concentrations measured on or directly adjacent to high-volume roadways. | **No Conflict.** SR-2 and the northbound SR-2 on-ramp from Fletcher Drive are not improved with sound walls in the immediate vicinity of the Project. However, as discussed above, the Project's seven-story parking structure with an urban farm on the roof level would provide a physical barrier that would increase vertical dispersion of pollutants emitted by vehicles. The existing adjacent self-storage facility would also serve to buffer and disperse emissions along the northernmost alignment of the freeway. Therefore, the proposed Project would not conflict with this strategy. |
| Vegetation for pollutant dispersion | Studies indicate that vegetation has the potential to alter pollutant transport and dispersion. In some studies, specific locations and conditions translated to air quality benefits (e.g., pollution concentration reductions of up to 20 percent on the leeward side of the tree line). It should be noted that most studies were conducted on the East Coast and in Europe where vegetation types and densities differ from what is found in California. | **No Conflict.** SR-2 and the SR-2 on-ramp from Fletcher Drive are improved with a landscaped buffer with significant vegetation that alters the flow of air movement and increases dispersion. Furthermore, much of the freeway alignment to the west is separated from the proposed Project by the LA River, which increases distance between the source and the receptor and is heavily vegetated. Therefore, the proposed Project would not conflict with this strategy. |
| ***Strategies that remove pollution from the air*** | | |
| Indoor high efficiency filtration | Studies show that particle filtration systems and devices, specifically high-efficiency filtration with mechanical ventilation or portable high efficiency air cleaners, can be highly effective for reducing indoor pollution concentrations. High efficiency filters in ventilation systems can remove from 50-99 percent of particles in the air. However, research shows that filtration technologies for gaseous pollutants (VOCs) are variable in their effectiveness; some remove certain VOCs well, but not others. | **No Conflict.** Section 99.04.504.6 of the LAMC requires mechanically ventilated buildings within 1,000 feet of a freeway to provide regularly occupied areas of the building with air filtration media for outside and return that provides a Minimum Efficiency Reporting Value (MERV) of 13. As such, the proposed Project would be compliant with the code and would not conflict with this strategy. |

[a] *CARB, Technical Advisory: Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways, April 2017.*

*(b) Consistency with the applicable goals and policies of the AQMP, SCAG's Regional Comprehensive Plan, and the 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS).*

*(i) SCAQMD Air Quality Management Plan*

As previously discussed, the proposed Project is located within the South Coast Air Basin and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's AQMP was updated in 2012 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. As discussed in IV.B, Air Quality, the proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the proposed Project. Therefore, the proposed Project would be consistent with the AQMP.

*(ii) SCAG Regional Transportation Plan / Sustainable Communities Strategy*

On April 2016, SCAG's Regional Council adopted the 2016-2040 RTP/SCS. The RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016-2040 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals.

On a policy level, the proposed Project is consistent with the goals and strategies of the RTP/SCS, as the proposed Project would revitalize an underutilized, fully-developed property. The proposed Project would increase the density and utilization of the Project Site and support and promote pedestrian activity on the Project Site by providing a pedestrian-scale development with residential, creative office and neighborhood-serving commercial uses. The proposed Project further promotes the connectivity of the Project Site to the surrounding neighborhood area as residents who live in proximity to the Project Site would be able to access the neighborhood serving commercial land uses via the pedestrian and bike paths connecting Casitas Avenue to the southern end of the Project Site where the commercial uses are proposed. The proposed Project is an infill development project within the Northeast Los Angeles CPA.

With respect to regional growth forecasts, SCAG forecasts that the City of Los Angeles Subregion will experience a population increase to 4.6 million persons by 2040. As further discussed in Section IV.H, Population, Housing, and Employment, SCAG's population and housing projections for the City of Los Angeles and the SCAG Region forecast from 2012 through 2040 envisions a population growth of 763,900 additional persons (an

approximate 20-percent growth rate) and 3,816,000 additional persons (an approximate 21-percent growth rate), respectively. The number of households within the City of Los Angeles is anticipated to increase by 364,800 households, or approximately 28 percent between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26 percent between 2012 and 2040. By 2040, the City of Los Angeles is expected to experience a 20-percent population growth, a 28-percent household unit growth, and a 28-percent employment growth as compared to the 2012 values. The proposed Project would construct 419 multi-family residential units that would result in approximately 1,127 permanent residents in the City of Los Angeles. The proposed increase in housing units and population would be consistent with SCAG's RTP/SCS, and a less-than-significant impact would occur.

*(c) Conclusion Regarding Land Use Impacts Related to Regulatory Consistency*

Based on the analysis above, the proposed Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. Therefore, the proposed Project would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to Threshold (b) and land use policy consistency would be less than significant.

*(d) Spot Zoning*

The Thresholds Guide includes as one its land use screening criteria: "Would the project result in a 'spot' zone". If the answer to the screening question is yes, further analysis is required. However, a spot zone does not in and of itself result in a significant land use impact; it merely requires further analysis. This Chapter includes such further analysis and assesses whether the Project would result in a significant impact under the Appendix G thresholds set forth above. As set forth herein, the Project would not physically divide an established community or conflict with an applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the proposed Project would not result in a significant land use impact as a result of a spot zone.

*(e) Industrial Displacement*

According to the Northeast Los Angeles Community Plan, there are 1,128 acres of industrially zoned property in the Northeast Los Angeles CPA (approximately 7.2 percent of the 15,682-acre total (including streets)). The Project Site comprises approximately 5.7 acres, or only approximately 0.5 percent of the industrially-zoned land and approximately 0.03 percent of the total land in the Northeast Los Angeles CPA.

The conversion of industrial land is an economic issue that is not within the scope of CEQA review unless it results in adverse impacts on the physical environment. While the proposed Project will displace the existing light manufacturing, warehouse, and production uses on the Project Site, the business currently operating at the site intends to relocate its operations outside of the State of California.[17] Thus, the existing light industrial uses will not relocate to other sites in the area and cause environmental impacts. Moreover, the Project's proposed zoning and Community Plan land use designation would allow light industrial and manufacturing uses onsite. As the current PF zoning would not allow industrial uses, the Project would facilitate possible industrial use in the future. Therefore, impacts with regard to industrial displacement would be less than significant.

#### (2) Mitigation Measures

The Project would not conflict with any of the applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect, and, as such, land use impacts would be less than significant. Therefore, no additional mitigation measures are required beyond those proposed for traffic impacts (see Section IV.K, Transportation/Traffic), and cumulative construction noise (see Section IV.G, Noise).

#### (3) Level of Significance After Mitigation

Land use impacts would be less than significant without mitigation.

### e) Cumulative Impacts

#### (1) Impact Analysis

Cumulative land use impacts could occur if other related projects in the vicinity of the Project Site would result in land use incompatibility effects in conjunction with the impacts of the proposed Project. The proposed Project would implement important local and regional goals and policies for the Northeast Los Angeles CPA, which would assist the City of Los Angeles in achieving short- and long-term planning goals and objectives. Furthermore, all related projects would be subject to the same development standards as the proposed Project with respect to assessing the consistency of each related project's respective Community Plan, the LAMC, the General Plan, and the other applicable specific and regional land use plans that govern their respective geographic area. Therefore, no significant cumulative land use impacts are anticipated.

[17] *Nelson-Miller, 2019.*

### (2) Spot Zoning

As noted above, the question of whether a project results a spot zone is merely a screening criterion under the L.A CEQA Thresholds Guide; a spot zone does not in and of itself constitute a significant impact. If a related project would result in the creation of a spot zone, it would be subject to further CEQA analysis to determine whether there would be a significant land use impact under the Appendix G thresholds of significance. If necessary, the City would require mitigation measures to address environmental impacts. Moreover, as noted above, the Project would not result in a significant land use impact as a result of a spot zone. Therefore, cumulative impacts with respect to spot zoning would be less than significant.

### (3) Industrial Displacement

The conversion of industrial land is an economic issue that is not within the scope of CEQA review unless it results in adverse impacts on the physical environment. While the proposed Project will displace the existing light manufacturing, warehouse, and production uses on the Project Site, in this case the business currently operating at the site intends to relocate its operations outside of the State of California. In addition, the proposed zoning and Community Plan land use designation would allow light industrial and manufacturing uses onsite. As the current PF zoning would not allow industrial uses, the Project would actually facilitate possible industrial use in the future. Moreover, the Project Site comprises 5.7 acres, or only approximately 0.5 percent of the industrially-zoned land and approximately 0.03 percent of the total land in the Northeast Los Angeles CPA. As such, the Project would not result in a significant impact with respect to industrial displacement. In addition, none of the related projects within the Northeast Los Angeles CPA are seeking zone changes and General Plan amendments from industrial designations to another designation. Any future project seeking such zone changes and General Plan amendments would be subject to CEQA review. If necessary, the City would require mitigation measures to address environmental impacts. As such, cumulative impacts related to displacement of industrial uses would be less than significant.

### (4) Mitigation Measures

Cumulative impacts related to land use plans, policies, and zoning would be less than significant. Therefore, no mitigation measures are required.

### (5) Level of Significance After Mitigation

Cumulative impacts related to land use plans, policies, and zoning would be less than significant without mitigation.

# IV. Environmental Impact Analysis

# G. Noise

## 1. Introduction

This section evaluates the potential for noise and groundborne vibration impacts resulting from the development of the proposed Project, including impacts associated with a substantial temporary and/or permanent increase in ambient noise levels in the vicinity of the Project Site; exposure of people in the vicinity of the Project Site to excessive noise levels, groundborne vibration, or groundborne noise levels; and whether this exposure is in excess of standards established in the local general plan or noise ordinance. Mitigation measures intended to reduce noise and vibration impacts are proposed, where appropriate, to avoid or reduce significant impacts of the proposed Project.

Data used to prepare this analysis were obtained from the City's General Plan Noise Element, the City of Los Angeles Municipal Code (LAMC), the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment (Harris, Miller, Miller & Hanson, 2006),[1] California Department of Transportation (Caltrans) Technical Noise Supplement (2013),[2] Federal Highway Administration (FHWA) Traffic Noise Model (TNM),[3] and by measuring and modeling existing and future noise levels at the Project Site and surrounding areas. The noise measurement data and calculations cited in this section are presented in greater detail in Appendix G to this Draft EIR.

### a) Fundamentals of Sound and Environmental Noise

Sound is technically described in terms of amplitude (i.e., loudness) and frequency (i.e., pitch). The standard unit of sound amplitude measurement is the decibel (dB). The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise

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1 *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*
2 *California Department of Transportation, Technical Noise Supplement, September 2013.*
3 *U.S. Department of Transportation, Federal Highway Administration, Traffic Noise Model Version 2.5, updated 6/28/2017.*

to human sensitivity. The A-weighted dB scale (dBA) provides this compensation by emphasizing frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound audible at such a level that the sound becomes an undesirable by-product of society's normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, causes actual physical harm, or results in adverse health effects. The definition of noise as unwanted sound implies that it has an adverse effect, or causes a substantial annoyance, to people and their environment. However, not every unwanted audible sound interferes with normal activities, causes harm, or has adverse health effects. For unwanted audible sound (i.e., noise) to be considered adverse it must occur with sufficient frequency and at such a level that adverse impacts are reasonably likely to occur.

A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise, such as traffic on a major highway. Table IV.G-1, Representative Environmental Noise Levels, illustrates representative noise levels in the environment.

**Table IV.G-1**
**Representative Environmental Noise Levels**

| Common Outdoor Activities | Noise Level (dBA) | Common Indoor Activities |
|---|---|---|
| | —110— | Rock Band |
| Jet Fly-over at 100 feet | | |
| | —100— | |
| Gas Lawnmower at 3 feet | | |
| | —90— | |
| | | Food Blender at 3 feet |
| Diesel Truck going 50 mph at 50 ft. | —80— | Garbage Disposal at 3 feet |
| Noisy Urban Area during Daytime | | |
| Gas Lawnmower at 100 feet | —70— | Vacuum Cleaner at 10 feet |
| Commercial Area | | Normal Speech at 3 feet |
| Heavy Traffic at 300 feet | —60— | |
| | | Large Business Office |
| Quiet Urban Area during Daytime | —50— | Dishwasher in Next Room |
| Quiet Urban Area during Nighttime | —40— | Theater, Large Conference Room (background) |
| Quiet Suburban Area during Nighttime | | |
| | —30— | Library |
| Quiet Rural Area during Nighttime | | Bedroom at Night, Concert Hall (background) |
| | —20— | |
| | | Broadcast/Recording Studio |
| | —10— | |
| | —0— | |

*Source: California Department of Transportation, Technical Noise Supplement, September 2013.*

Several rating scales have been developed to analyze the adverse effects of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effects of noise on people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- $L_{eq}$: An $L_{eq}$, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the $L_{eq}$ of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- $L_{max}$: The maximum instantaneous noise level experienced during a given period of time.
- $L_{min}$: The minimum instantaneous noise level experienced during a given period of time.
- CNEL: The Community Noise Equivalent Level (CNEL) is a 24-hour average $L_{eq}$ with a 5-dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10-dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a constant 60-dBA 24-hour $L_{eq}$ would result in a CNEL of 66.7 dBA.

Noise environments and consequences of human activities are usually well-represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Frequent exposure to noise levels greater than 85 dBA over time can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5-dBA CNEL increase is readily noticeable to most people, while the human ear perceives a 10-dBA CNEL increase as a doubling of sound. However, there is no direct correlation between increasing or even doubling noise-generating uses and what is detectable by the human ear as an increase in noise level. The human ear perceives a 10-dBA increase in sound level to be a doubling of sound volume, but doubling the sound wave energy, (i.e., the noise-generating activity), only results in a 3-dBA increase in sound. This means that a doubling of sound wave energy (e.g., doubling the volume of traffic on a roadway) would result in a barely perceptible change in sound level to the human ear. Thus, relatively sizeable increases in baseline noise generation are not necessarily perceived as significant noise increases by the human ear.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflective barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source (assume a starting point of 50 feet), the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels are also generally reduced by about 1 dBA for each 1,000 feet of distance due to air absorption. In general, the maximum noise reduction that can be achieved from a barrier is about 20 dBA for thin screens (walls) and 23 dBA for berms.[4] The normal noise attenuation within residential structures with open windows is about 10 dBA, while the noise attenuation with closed windows is a minimum of 25 to 35 dBA.[5]

## b) Fundamentals of Environmental Groundborne Vibration

Vibration is sound radiated through the ground. Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, etc.) causing the adjacent ground to move and creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration

[4] *Caltrans, Technical Noise Supplement, Chapter 5.1.1, 2013.*

[5] *FHWA, Highway Traffic Noise Analysis and Abatement Policy and Guidance, 2011.*

level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The general human response to different levels of groundborne vibration velocity levels is described in Table IV.G-2, Human Response to Different Levels of Groundborne Vibration, below. The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. For purposes of human perception, the range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings, such as historic buildings.

**Table IV.G-2**
**Human Response to Different Levels of Groundborne Vibration**

| Vibration Velocity Level | Human Perception |
|---|---|
| 65 VdB | Approximate threshold of perception for many people. |
| 75 VdB | Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable. |
| 85 VdB | Vibration acceptable only if there are an infrequent number of events per day. |

*Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

# 2. Environmental Setting

## a) Regulatory Framework

### (1) Federal

#### *(a) Noise*

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the proposed Project. However, Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise.

#### *(b) Vibration*

The Federal Transit Administration (FTA) has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. The vibration damage criteria adopted by the FTA are shown in Table IV.G-3, Federal Transit Administration's Construction Vibration Building Damage Criteria.

**Table IV.G-3**
**Federal Transit Administration's Construction Vibration Building Damage Criteria**

| Building Category | Peak Particle Velocity (PPV) (in/sec) |
|---|---|
| I. Reinforced-concrete, steel or timber (no plaster) | 0.50 |
| II. Engineered concrete and masonry (no plaster) | 0.30 |
| III. Non-engineered timber and masonry buildings | 0.20 |
| IV. Buildings extremely susceptible to vibration damage | 0.12 |

*Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

In addition to the FTA Construction Vibration Impact Criteria for Building Damage, the FTA guidance manual also provides vibration criteria for human annoyance for various uses. These criteria were established primarily for rapid transit (rail) projects and are based on the frequency of vibration events. The FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three land-use categories: (1) Vibration Category 1 – High Sensitivity; (2) Vibration Category 2 – Residential; and (3) Vibration Category 3 – Institutional. The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution

lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses with primarily daytime use such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference.

Under conditions where there are an infrequent number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 80 VdB for Category 2 buildings, and 83 VdB for Category 3 buildings.[6] Under conditions where there are an occasional number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 75 VdB for Category 2 buildings, and 78 VdB for Category 3 buildings.[7] Under conditions where there are a frequent number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 72 VdB for Category 2 buildings, and 75 VdB for Category 3 buildings.[8] No thresholds have been adopted or recommended for commercial or office uses.

### (2) State

#### *(a) Noise*

The California Department of Health Services has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines for land use and noise exposure compatibility are shown in Table IV.G-4, Community Noise Exposure Guidelines. In addition, Section 65302(f) of the California Government Code requires each county and city in the state to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

#### *(b) Vibration*

There are no state vibration standards that apply to the proposed Project. Moreover, according to the Caltrans *Transportation and Construction Vibration Guidance Manual* (2013), there are no official Caltrans standards for vibration. Therefore, this analysis uses

[6] *"Infrequent events" are defined by the FTA as being fewer than 30 vibration events of the same kind per day. FTA, Transit Noise and Vibration Impact Assessment, May 2006.*

[7] *"Occasional events" are defined by the FTA as between 30 and 70 vibration events of the same source per day. FTA, Transit Noise and Vibration Impact Assessment, May 2006.*

[8] *"Frequent events" are defined by the FTA as more than 70 vibration events of the same source per day. FTA, Transit Noise and Vibration Impact Assessment, May 2006.*

the FTA criteria for structural damage as discussed above and shown in Table IV.G-3 to assess construction impacts relative to structural damage from groundborne vibration.

### (3) City of Los Angeles

#### *(a) General Plan Noise Element*

As discussed previously, California Government Code Section 65302(g) requires that a noise element be included in the general plan of each county and city in the state. The City's Noise Element identifies sources of noise and provides objectives and policies that ensure that noise from various sources do not create an unacceptable noise environment. The City's Noise Element describes the noise environment (including noise sources) in the City, addresses noise mitigation regulations, strategies, and programs as well as delineating federal, state, and City jurisdiction relative to rail, automotive, aircraft, and nuisance noise.

The City's noise standards are correlated with land use zoning classifications in order to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds the ambient noise levels within a specified zone. The City has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the DHS for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the City's General Plan Noise Element and the City's *CEQA Thresholds Guide* in terms of the CNEL. The noise/land use compatibility guidelines for land uses within the City are presented in Table IV.G-4, Community Noise Exposure Guidelines.

In accordance with the City's Noise Element, a noise exposure of 60 dBA CNEL or less is considered to be the most desirable target for the exterior of noise-sensitive land uses, or sensitive receptors, such as homes, schools, churches, libraries, etc. It is also recognized that such a level may not always be possible in areas of substantial traffic noise intrusion. Exposures up to 70 dBA CNEL for noise-sensitive uses are generally considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dBA CNEL are normally unacceptable for sensitive receptors except in unusual circumstances.

**Table IV.G-4**
**Community Noise Exposure Guidelines**

| Land Use | Normally Acceptable[a] | Conditionally Acceptable[b] | Normally Unacceptable[c] | Clearly Unacceptable[d] |
|---|---|---|---|---|
| Single-Family, Duplex, Mobile Homes | 50 - 60 | 55 - 70 | 70 - 75 | above 75 |
| Multi-Family Homes | 50 - 65 | 60 - 70 | 70 - 75 | above 75 |
| Schools, Libraries, Churches, Hospitals, Nursing Homes | 50 - 70 | 60 - 70 | 70 - 80 | above 80 |
| Transient Lodging – Motels, Hotels | 50 - 65 | 60 - 70 | 70 - 80 | above 75 |
| Auditoriums, Concert Halls, Amphitheaters | --- | 50 - 70 | --- | above 70 |
| Sports Arena, Outdoor Spectator Sports | --- | 50 - 75 | --- | above 75 |
| Playgrounds, Neighborhood Parks | 50 - 70 | --- | 67 - 75 | above 75 |
| Golf Courses, Riding Stables, Water Recreation, Cemeteries | 50 - 75 | --- | 70 - 80 | above 80 |
| Office Buildings, Business and Professional Commercial | 50 - 70 | 67 - 77 | above 75 | --- |
| Industrial, Manufacturing, Utilities, Agriculture | 50 - 75 | 70 - 80 | above 75 | --- |

*[a] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.*
*[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.*
*[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.*
*[d] Clearly Unacceptable: New construction or development should generally not be undertaken.*
*Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services (DHS)); City General Plan Noise Element, adopted February 1999.*

### *(b) LAMC Noise Regulations*

The City has numerous ordinances and enforcement practices that apply to intrusive noise and that regulate new construction activities. The City's comprehensive noise ordinance, found in Chapter XI of the LAMC, sets forth sound measurement and criteria, minimum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for

determining when noise is deemed to be a disturbance, and legal remedies for violations. Key provisions of Chapter XI of the LAMC are discussed below.

Section 112.05 of the LAMC prohibits the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet from the source of the noise between the hours of 7:00 A.M. and 10:00 P.M. when the source is located within 500 feet of a residential zone:

- 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors, and pneumatic or other powered equipment;

- 75 dBA for powered equipment of 20 horsepower or less intended for infrequent use in residential areas, including chain saws, log chippers, and powered hand tools; or

- 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools, and riding tractors.

The noise limitations above do not apply where compliance is deemed to be technically infeasible. The term technically infeasible means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction device or techniques during the operation of the equipment. The aforementioned limitations apply only to uses in residential zones or within 500 feet thereof.

In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to (1) radios, television sets, and similar devices defined in LAMC Section 112.01; (2) air conditioning, refrigeration, heating, pumping, and filtering equipment defined in LAMC Section 112.02; (3) powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices defined in LAMC Section 112.04; and (4) motor vehicles driven on-site as defined in LAMC Section 114.02. These standards apply regardless of the off-site land use. Furthermore, Section 112.05 of the LAMC limits the use of any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet from the noise source when the construction and industrial machinery is located within 500 feet of a residential zone.

Section 41.40 of the LAMC prohibits construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6 P.M. and 8 A.M. on Saturday. All such activities are also prohibited on Sundays and all federal holidays.

The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address; permit number; name and phone number of the contractor and owner or owner's agent; hours of construction allowed by code or any discretionary approval for the Project Site; and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

The LAMC Noise Regulations state that where the ambient noise level is less than the presumed ambient noise level designated, the presumed ambient noise level shall be deemed to be the minimum ambient noise level. The City's presumed ambient noise levels are provided in Table IV.G-5 below. In cases where the actual ambient conditions are not known, the City's presumed daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) ambient noise levels defined in Section 113.03 of the LAMC should be used.

**Table IV.G-5**
**City of Los Angeles Presumed Ambient Noise Levels**

| Land Use Type (Zone) | Presumed Ambient Noise Level (dBA) | |
|---|---|---|
| | Day (7 AM to 10 PM) | Night (10 PM to 7 AM) |
| Residential, School, Hospital, Hotel, Agriculture (A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5) | 50 | 40 |
| Commercial (P, PB, CR, C1, C1.5, C2, C5, and CM) | 60 | 55 |
| Manufacturing (M1, MR1, and MR2) | 60 | 55 |
| Heavy Manufacturing (M2 and M3) | 65 | 65 |
| *Source: LAMC Chapter XI, Noise Regulations, Section 111.03. Minimum Ambient Noise Level.* | | |

### *(c) City Groundborne Vibration Regulations*

The City has not adopted any regulations for construction or operational groundborne vibration impacts. Therefore, this analysis uses the FTA criteria for structural damage, as

discussed above and shown in Table IV.G-3, to assess construction impacts relative to structural damage from groundborne vibration.

## b) Existing Conditions

### (1) Existing Ambient Daytime Noise Levels

The Project Site is currently developed and operating with a manufacturing/ warehouse/production facility and associated surface parking lot. Ambient noise levels at the Project Site are attributable to activities associated with manufacturing/ warehouse/production uses, cars entering and leaving the Project Site, employees working on the Project Site, the SR-2 Freeway traffic, trains, helicopters, and typical residential activities (dogs barking, garbage trucks). To establish baseline noise conditions, existing daytime noise levels were monitored at four locations in the vicinity of the Project Site representing potential noise levels for adjacent sensitive receptors. The approximate locations of where the noise measurements were taken are depicted in Figure IV.G-1, Noise Monitoring and Sensitive Receptor Location Map. The noise measurements were conducted on Wednesday August 30, 2017 between approximately 10:00 A.M. and 12:00 P.M. using a Larson-Davis 831 precision sound level meter (SLM), which meets the industry standard performance requirements for "Type 1" standard instruments as defined in the American National Standard Institute (ANSI) S1.4. This noise meter complies with the requirements specified in LAMC Section 111.01(l) that the instruments be "Type S2A" standard instruments or better and was calibrated and operated according to the manufacturer's written specifications. The SLM recording measurements are provided in Appendix G to this EIR.

At the measurement sites identified in Figure IV.G-1, the microphone was placed at a height of approximately five feet above grade level, which is consistent with standard protocol for conducting community noise measurements. The sound level meter was programmed to record the average sound level ($L_{eq}$) over a cumulative period of 15 minutes in accordance with LAMC Section 111.01(a). The results of the measurements are summarized in Table IV.G-6, Existing Ambient Daytime Noise Levels in the Project Site Vicinity.

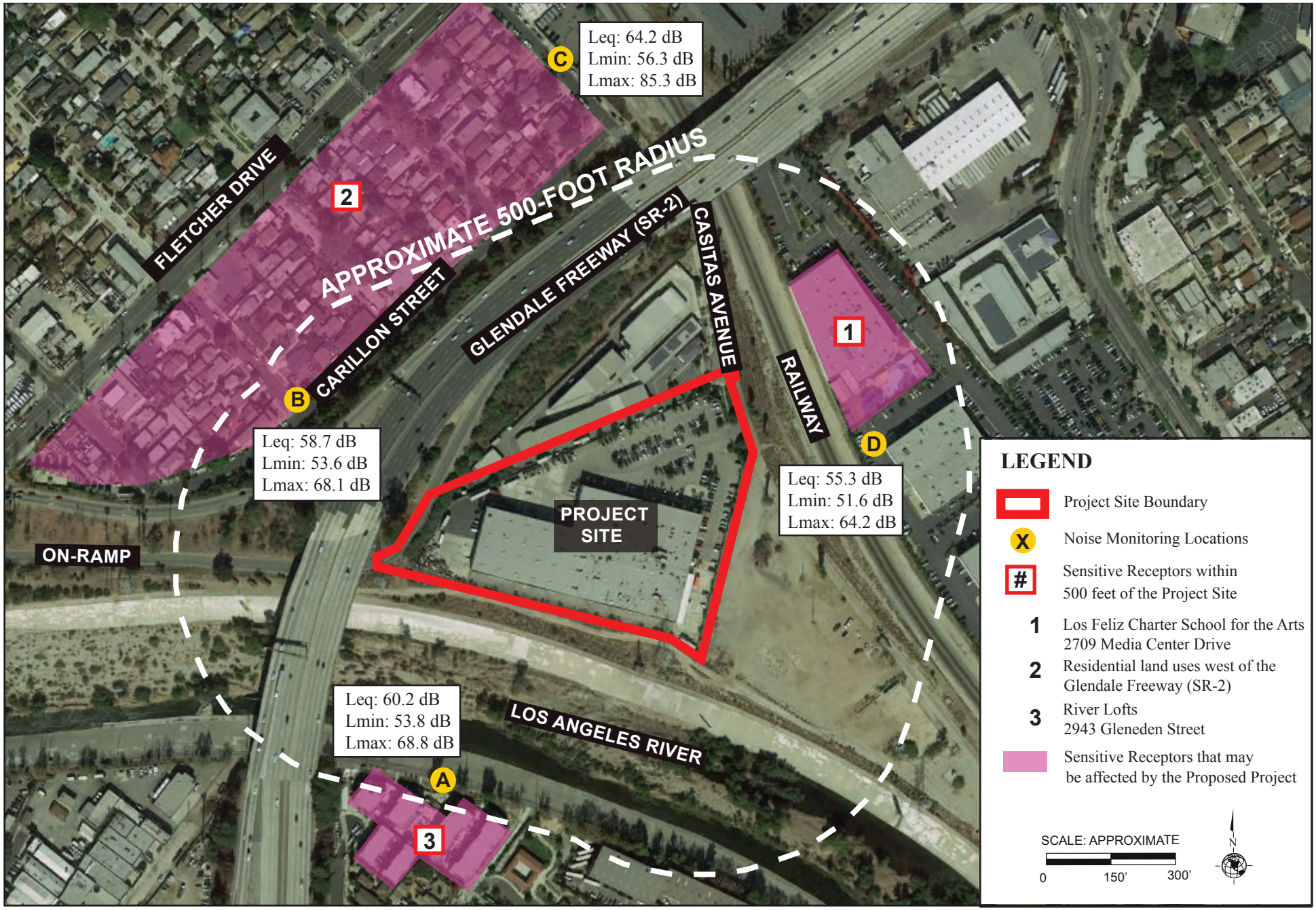
**Table IV.G-6**
**Existing Ambient Daytime Noise Levels in Project Site Vicinity**

| No. | Location | Primary Noise Sources | Noise Level Statistics [a] | | |
|---|---|---|---|---|---|
| | | | $L_{eq}$ | $L_{min}$ | $L_{max}$ |
| A | South side of the LA River along the Los Angeles River Greenway Trail adjacent to the Los Angeles River House development | SR-2 traffic, bicyclists and pedestrians along trail, Metrolink, helicopter. | 60.2 | 53.8 | 68.8 |
| B | At the Intersection of Atwater Avenue and Carillon Street | SR-2 traffic, minimal vehicular and pedestrian activity | 58.7 | 53.6 | 68.1 |
| C | On the north side of Casitas Avenue between Fletcher Drive and Carillon Street | SR-2 traffic, dogs barking, light vehicle activity, helicopter, garbage truck | 64.2 | 56.3 | 85.3 |
| D | South of the Los Feliz Charter School for the Arts; east of the railroad Right-of-Way | SR-2 traffic, delivery truck activity from adjacent manufacturing buildings. | 55.3 | 51.6 | 64.2 |

[a] *Noise measurements were taken on Wednesday, August 30, 2017 at each location for a duration of 15 minutes. See Appendix G of this EIR for noise monitoring data sheets.*

As shown in Table IV.G-6, above, the ambient recorded noise levels ($L_{eq}$) ranged from 55.3 dBA to 64.2 dBA in the vicinity the Project Site. The primary noise sources that contributed most to the measured ambient noise levels included roadway traffic, delivery trucks, commercial/industrial activities, the Metrolink trains, and traffic from SR-2.

The measured ambient noise levels in the vicinity of the Project Site exceed the City's presumed ambient noise levels identified in LAMC Chapter XI, Section 111.03 and summarized in Table IV.G-5, above. Therefore, the measured ambient noise levels recorded in this analysis represent the baseline ambient noise levels. Since the measured ambient noise levels range from 10:00 AM to 12:00 PM, this analysis utilizes the presumed nighttime ambient noise levels when necessary.




Sources: Parker Environmental Consultants, August 30, 2017; and Google Earth, Aerial View, October 18, 2016.

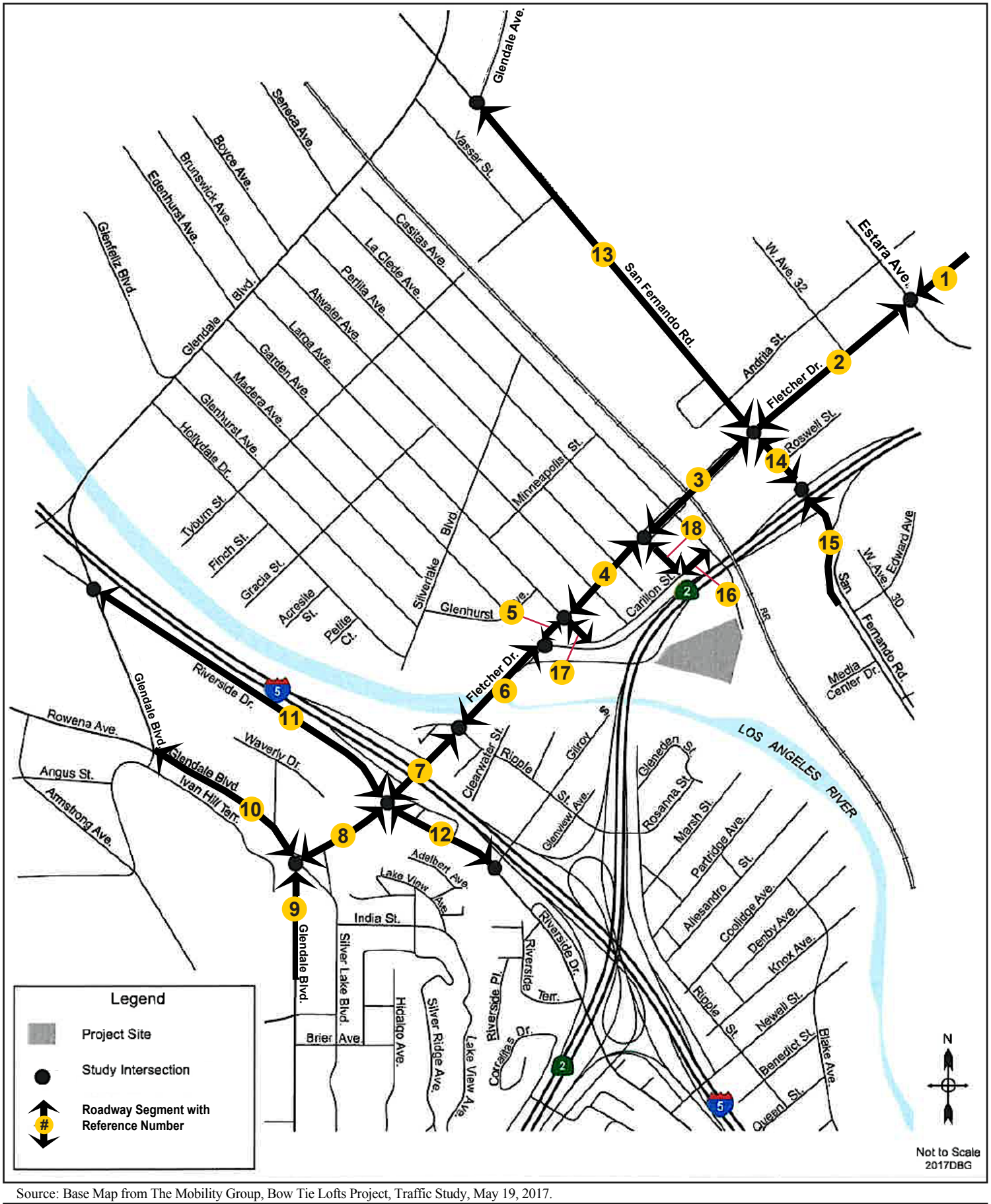
Figure IV.G-1
Noise Monitoring and Sensitive Receptor Location Map

### (2) Existing Mobile Noise Levels

Existing mobile noise levels were estimated for 18 roadway segments located in proximity to the Project Site, as shown in Figure IV.G-2, Roadway Segment Traffic Noise Location Map. These roadway segments were selected for analysis because they would be most directly impacted by Project-related traffic as determined in the Project's Traffic Impact Study. These roadway segments, when compared to other roadway segments located further away from the Project Site, would experience the greatest percentage increase in traffic generated by the proposed Project.

Traffic noise levels were calculated using the FHWA TNM program and traffic volume data from the Traffic Impact Study.[9] The TNM traffic noise prediction model calculates the 24-hour CNEL levels based on specific information, including the peak hour traffic volume, vehicle fleet mix, roadway speed limits, roadway geometrics, and lateral distance between the noise receptor and the roadway. The existing ambient roadway noise levels and corresponding community noise exposure categories as identified in the City's Community Noise Compatibility Guidelines are presented in Table IV.G-7, Existing Vehicular Traffic Noise Levels, below. As shown in Table IV.G-7, the existing noise levels on local roadway segments analyzed range from 54.4 dBA CNEL to 56.9 dBA CNEL at local residential roadways (i.e., Carillon Street, Larga Avenue, and La Clede Avenue) and from 66.6 dBA CNEL to 72.5 dBA CNEL on commercial corridors (i.e., Fletcher Drive, Glendale Boulevard, Riverside Drive, and San Fernando Road). All of the roadway segments analyzed are currently operating under "normally acceptable," "conditionally acceptable," or "normally unacceptable" community noise compatibility categories.

[9] *The Traffic Impact Study is provided in Appendix J.2 to this EIR.*




Source: Base Map from The Mobility Group, Bow Tie Lofts Project, Traffic Study, May 19, 2017.

Figure IV.G-2
Roadway Segment Traffic Noise Location Map

## Table IV.G-7
## Existing Vehicular Traffic Noise Levels

| | Roadway Segment | Adjacent Land Uses | Existing Noise Exposure Compatibility Category[a] | Existing CNEL (dBA) at the Roadway Right-of-Way |
|---|---|---|---|---|
| **Fletcher Drive** | | | | |
| 1. | Between Ave. 34 and Estara Ave. | MF Residential, School, Commercial | Conditionally Acceptable | 67.2 |
| 2. | Between Estara Ave. and San Fernando Rd. | Commercial, School | Conditionally Acceptable | 69.9 |
| 3. | Between San Fernando Rd. and La Clede Ave. | Commercial, Residential | Normally Unacceptable | 70.4 |
| 4. | Between La Clede Ave. and Larga Ave. | Commercial, Residential | Conditionally Acceptable | 69.3 |
| 5. | Between Larga Ave. and SR-2 SB Off Ramp | Commercial | Normally Acceptable | 69.1 |
| 6. | Between SR-2 Off-Ramp and Ripple St. | LA River Crossing | Normally Unacceptable | 72.5 |
| 7. | Between Ripple St. and Riverside Dr. | Commercial | Normally Acceptable | 71.9 |
| 8. | Between Riverside Dr. and Glendale Blvd. | Commercial, Residential | Normally Unacceptable | 72.0 |
| **Glendale Boulevard** | | | | |
| 9. | Between Fletcher Dr. and Silver Lake Blvd. | Commercial, Residential | Normally Unacceptable | 72.5 |
| 10 | Between Lakewood Ave. and Fletcher Dr. | Commercial, Residential | Conditionally Acceptable | 69.5 |
| **Riverside Drive** | | | | |
| 11 | Between Glendale Blvd. and Fletcher Dr. | Commercial, Residential | Conditionally Acceptable | 69.6 |
| 12 | Between Fletcher Dr. and Gilroy St. | Commercial, Residential | Conditionally Acceptable | 69.0 |
| **San Fernando Road** | | | | |
| 13 | Between Glendale Ave. and Fletcher Dr. | Commercial | Conditionally Acceptable | 66.6 |
| 14 | Between Fletcher Dr. and SR-2 | Commercial | Normally Acceptable | 66.9 |
| 15 | Between SR-2 and Edward Way | School, Commercial | Normally Unacceptable | 70.9 |
| **Carillon Street** | | | | |
| 16 | Between Larga Ave. and Casitas Ave. | Single Family Residential | Normally Acceptable | 54.4 |
| **Larga Avenue** | | | | |
| 17 | Between Fletcher Dr. and Carillon St. | Single Family Residential | Conditionally Acceptable | 56.7 |
| **La Clede Avenue** | | | | |
| 18 | Between Fletcher Dr. and Carillon St. | Single Family Residential | Conditionally Acceptable | 56.9 |

*Notes:*

*[a] The applicable noise level ranges for the existing noise exposure compatibility category are defined in Table IV.G-4, Community Noise Exposure Guidelines, above. It should be noted that many of the category ranges overlap. For purposes of applying the most conservative threshold, the higher range was identified for purposes of applying the threshold criteria (i.e., a 3-dBA CNEL or greater increase to or within the "normally unacceptable" or "clearly unacceptable" range and a 5-dBA CNEL or greater increase for all other categories.)*

*Source: Parker Environmental Consultants. The TNM worksheets are provided in Appendix G to the EIR.*

### (3) Existing Groundborne Vibration Levels

The main sources of groundborne vibration near the Project Site are heavy-duty vehicular travel (e.g., refuse trucks and delivery trucks) on local roadways and the adjacent railway to the east. Trucks and buses typically generate groundborne vibration velocity levels of around 63 VdB at 50 feet, and these levels could reach 72 VdB where trucks and buses pass over bumps in the road. Light rail systems, such as transit rail vehicles, with speeds of 50 miles per hour (mph) typically generate vibration of about 72 VdB at a distance of 60 feet from the track centerline. Heavy locomotives, such as freight trains, can result in vibration levels that, on average, are about 5 to 10 decibels higher than rail transit vehicles and can be 10 decibels higher than typical if there is an unusually rough track.[10] In terms of PPV levels, a heavy-duty vehicle traveling at a distance of 50 feet can result in a vibration level of approximately 0.001 inch per second. The on-site industrial activity could also contribute to vibration levels on the Project Site.

### (4) Noise Sensitive Receptors

Noise sensitive land uses on the properties surrounding the Project Site include multi-family residential, single-family residential, and educational land uses. Sensitive receptors within 500 feet of the Project Site are depicted in Figure IV.G-1, Noise Monitoring and Sensitive Receptor Location Map. For purposes of assessing noise impacts on sensitive populations, the following sensitive receptors in proximity to the Project Site were identified:

1) 2709 Media Center Drive – Los Feliz Charter School for the Arts;
2) Residential land uses west of SR-2 along Carillon Street; and
3) 2943 Gleneden Street – L.A. River Lofts apartments across the Los Angeles River from the Project Site.

# 3. Project Impacts

## a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the proposed Project would have a significant impact on noise if it would result in:

***Threshold (a): Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of***

[10] *FTA, Transit Noise and Vibration Impact Assessment, May 2006.*

***standards established in the local general plan or noise ordinance, or applicable standards of other agencies;***

***Threshold (b): Generation of excessive groundborne vibration or groundborne noise levels; or***

***Threshold (c): For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.***

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

The Thresholds Guide identifies the following criteria to evaluate impacts related to noise:

(1) Construction Noise

a) Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA (hourly $L_{eq}$) or more at a noise sensitive use;

b) Construction activities lasting more than ten days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA (hourly $L_{eq}$) or more at a noise sensitive use; or

c) Construction activities would exceed the ambient noise level by 5 dBA (hourly $L_{eq}$) at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or anytime on Sunday.[11]

(2) Operational Noise

The L.A. CEQA Thresholds Guide and City's LAMC Noise Regulations identified the following criteria to evaluate the Project's operational noise impacts:

- Project operations would have a significant impact on noise levels if they cause the ambient noise level measured at the property line of affected uses increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or

[11] *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.1-3.*

- any 5 dBA or greater noise increase, as specified in Table IV.G-4, Community Noise Exposure Guidelines.[12]

#### (3) Construction Vibration

The City has not adopted any regulations for construction groundborne vibration impacts. Consequently, for purposes of this analysis, the FTA's adopted vibration standards for assessing potential building damage and annoyance were used to evaluate potential impacts related to project construction.

Based on FTA criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the potential threshold criteria listed in Table IV.G-3, above, were exceeded.

In terms of groundborne vibration impacts associated with human annoyance, the FTA's vibration impact thresholds for sensitive buildings, residences, and institutional land uses under conditions where there are a frequent number of events per day, was applied to provide a conservative vibration analysis. These thresholds are 65 VdB at buildings where vibration would interfere with interior operations, 72 VdB at residences and buildings where people normally sleep, and 75 VdB at other institutional buildings.[13] The 65 VdB threshold applies to typical land uses where vibration would interfere with interior operations, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment include, but are not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. The 72 VdB threshold applies to all residential land uses and any buildings where people sleep, such as hotels and hospitals. The 75 VdB threshold applies to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment but still have the potential for activity interference.

## b) Methodology

### (1) On-Site Construction Activities

Construction noise impacts were evaluated by calculating the construction related noise levels at representative sensitive receptor locations in the vicinity of the Project Site and comparing the anticipated construction noise levels to the existing ambient noise measurements recorded in proximity to the same receptors. Construction noise levels were estimated by data published by the USEPA, as published in the *L.A. CEQA Thresholds Guide*. These noise levels are then analyzed against the construction noise

[12] *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.2-3.*
[13] *FTA, Transit Noise and Vibration Impact Assessment, May 2006.*

standards established in the LAMC and *L.A. CEQA Thresholds Guide* to determine whether the allowable noise levels would be exceeded at off-site locations that are sensitive to noise.

Groundborne vibration impacts on building structures resulting from heavy construction equipment used during earthwork and construction activities were estimated by data published in the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment (Harris, Miller, Miller & Hanson, 2006). Potential vibration levels resulting from construction equipment were calculated at nearby off-site buildings and structures that are sensitive to vibration based on soil type and distance attenuation.

### (2) Off-Site Construction Activities

#### *(a) Off-Site Construction Noise*

The proposed Project's impacts from off-site construction noise, such as haul trucks and construction worker trips, were analyzed using the trips generated from the total hauling trips and the increase in noise on local roadways. Roadway noise attributable to construction trips was compared to the noise levels generated by existing trips on local roadways.

#### *(b) Off-Site Construction Vibration*

Groundborne vibration levels for off-site activities (i.e., hauling) were also estimated using data in the FTA's Noise and Vibration Impact Assessment (which provides the formulas and vibration levels of specific construction equipment) and analyzed against the thresholds based on the sensitive receptor's land use. These thresholds are 65 VdB at buildings where vibration would interfere with interior operations, 72 VdB at residences and buildings where people normally sleep, and 75 VdB at other institutional buildings.

### (3) Operational Impacts

#### *(a) Roadway Noise Impacts*

The proposed Project's operational impacts from mobile noise sources were analyzed using the FHWA TNM traffic noise prediction model, which calculates the 24-hour CNEL levels based on specific information, including the peak hour traffic volume, vehicle fleet mix, roadway speed limits, roadway geometrics, and lateral distance between the noise receptor and the roadway. The roadway noise impacts were based on traffic volume data as reported in the Traffic Impact Study for the Existing (2017) "No Project" scenario, "Existing (2017) With Project", and "Future (2023) with Project" scenarios, respectively. The Technical Noise Supplement methodology is based on roadway configurations, barrier attenuation (if applicable, and distance to receiver locations. Roadway noise

attributable to the proposed Project was calculated by comparing the "Existing (2017) With Project" noise levels to the existing baseline scenario (i.e., "Existing (2017) No Project").

*(b) Stationary Noise Impacts*

Stationary point-source noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources, such as building mechanical equipment, loading area activity, and activities anticipated to occur within accessible outdoor open space areas, and calculating the hourly $L_{eq}$ noise level from each noise source at sensitive receptor property lines.

*(c) Operational Vibration Impacts*

Operational vibration impacts were evaluated by identifying operational sources of vibration, such as loading and refuse trucks, and assessing whether the addition of these operations would impact surrounding off-site sensitive receptors.

## c) Project Design Features

The following Project Design Features are applicable to the Project.

**Project Design Feature NOI-PDF-1**: Construction and demolition will be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday or national holidays.

**Project Design Feature NOI-PDF-2**: Project construction will not include the use of impact driven pile systems (i.e., pile drivers).

**Project Design Feature NOI-PDF-3**: All building outdoor mounted mechanical, heating ventilation and air conditioning (HVAC), and electrical equipment will be designed to comply with LAMC noise regulations to prohibit noise from any stationary mechanical systems from exceeding the ambient noise levels at the property line by more than 5 dBA $L_{eq}$.

**Project Design Feature NOI-PDF-4**: Outdoor amplified sound systems (e.g., speaker and stereo systems, or other sound producing devices) will be designed so as not to exceed 5 dBA (hourly $L_{eq}$) above ambient noise levels at any residential off-site receptor.

**Project Design Feature NOI-PDF-5**: The perimeter of the outdoor restaurant seating areas will be designed with a five-foot high glass, plexiglass, or other solid barrier to confine noise within the outdoor seating area.

# d) Analysis of Project Impacts

***Threshold (a): Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

## (1) Construction Noise

Construction of the proposed Project would require demolition, earthwork, and building construction activities that would generate noise on a temporary and intermittent basis throughout the duration of the construction process. As stated in Section II, Project Description, construction is anticipated to occur over an approximately 30-month period and would involve the following phases: (1) demolition, (2) site clearing/preparation, (3) excavation/grading, (4) building construction, (5) paving, and (6) architectural coatings/finishing. Construction activities would be performed in accordance with all applicable state and federal laws, and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Project would comply with these restrictions. Construction activities would also be conducted in accordance with the project design features identified above (i.e., Project Design Features NOI-PDF-1 and NOI-PDF-2).

### *(a) On-Site Construction Noise*

Based on the typical outdoor construction noise levels published by the USEPA and as cited in the Thresholds Guide, as shown in Table IV.G-8, below, construction activities are anticipated to result in noise levels in the range of 77 to 86 dBA $L_{eq}$, with the use of mufflers and depending upon the phase and type of activities occurring on-site during each phase of construction.

**Table IV.G-8**
**Typical Outdoor Construction Noise Levels**

| Construction Phase | Noise Levels at 50 Feet (dBA $L_{eq}$) | Noise Levels at 50 Feet with Mufflers (dBA $L_{eq}$) |
|---|---|---|
| Ground Clearing | 84 | 82 |
| Excavation, Grading | 89 | 86 |
| Foundations | 78 | 77 |
| Structural | 85 | 83 |
| Finishing | 89 | 86 |

*Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971; and LA CEQA Guide Exhibit I.1-2 at page I.1-9.*

The noise levels shown in Table IV.G-8 represent composite noise levels associated with typical construction phases, which take into account both the number of pieces and spacing of heavy construction equipment that are typically operated during each phase of construction. As shown in Table IV.G-8, construction noise during heavier initial periods of construction (i.e., excavation and grading) would typically reach 86 dBA $L_{eq}$ (with mufflers) when measured at a reference distance of 50 feet from the center of construction activity. These noise levels would diminish notably with distance from the construction site at a rate of 6 dBA per doubling of distance (noise from stationary or point sources is reduced by about 6 dBA for every doubling of distance at acoustically hard locations). For example, a noise level of 86 dBA $L_{eq}$ measured at 50 feet from the noise source to the receptor would decline to 80 dBA $L_{eq}$ at 100 feet from the source to the receptor and fall by another 6 dBA $L_{eq}$ to 74 dBA $L_{eq}$ at 200 feet from the source to the receptor. These noise attenuation rates assume a flat and unobstructed distance between the noise source and the receptor. Intervening structures, vegetation, and differences in topography would further attenuate the noise as it propagates from the source. As applicable these factors were factored into the noise impact analysis, as presented below.

For purposes of assessing construction related noise impacts at adjacent off-site land uses, noise levels from the Project Site activities were calculated at each of the sensitive receptor locations previously identified in this section based on distance attenuation, ground absorption (i.e., acoustically hard or soft sites), and intervening structures or topographical features that block the line-of-sight between the noise source and the noise receptor. Table IV.G-9, Estimated On-Site Construction Noise at Off-Site Sensitive Receptor Locations, provides a summary of the noise impacts at each of the sensitive receptors.

**Table IV.G-9**
**Estimated On-Site Construction Noise at Off-Site Sensitive Receptor Locations**

| No. [a] | Sensitive Land Use | Distance to Project Site (feet) | Existing Ambient Noise Levels (dBA $L_{eq}$) | Estimated Exterior Peak Construction Noise Levels (dBA $L_{eq}$) [b] | Noise Impact (Above Ambient) (dBA $L_{eq}$) |
|---|---|---|---|---|---|
| 1 | Los Feliz Charter School for the Arts; 2709 Media Center Drive | 230 | 55.3 | 58.4 | 3.1 |
| 2 | Residential neighborhood west of SR-2 along Carillon Street | 350 | 58.7 | 54.1 | 0.0 |
| 3 | L.A. River Lofts Apartments; 2943 Gleneden Street | 450 | 60.2 | 60.6 | 0.4 |

*Notes:*
*[a] See Figure IV.G-1, Noise Monitoring and Sensitive Receptor Location Map.*
*[b] For calculations and attenuation factors applied to each receptor location, see Appendix G to this EIR. Based on the characteristics of the soft ground and vegetation between the Project Site and sensitive receptors, a computation of ground factor G of 0.66 was applied for soft ground attenuation.*
*[c] Ambient noise levels for Receptor 2 were recorded at measurement locations B and C. To apply a conservative comparison, the lower ambient noise level is shown in this table.*
*Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006.*

Sensitive Receptor 1, identified as the Los Feliz Charter School for the Arts at 2709 Media Center Drive, is located approximately 230 feet east of the Project Site and is separated by an elevated earthen berm that is approximately 12 to 15 feet above grade, along the railroad Right-of-Way easement. Based on the distance attenuation and an attenuation factor of 10 dBA resulting from the earthen berm, the highest construction noise impact at this sensitive receptor is estimated to be 58.4 dBA $L_{eq}$, or approximately 3.1 dBA $L_{eq}$ above ambient noise levels. Because construction noise levels would not exceed 5 dBA $L_{eq}$, construction noise levels from the Project Site at Receptor 1 would be less than significant.

Sensitive Receptor 2, identified as the residential neighborhood west of SR-2 along Carillon Street, is located approximately 350 feet north of the Project Site. Between the Project Site and this receptor is a two-story self-storage building and SR-2, which is elevated on an earthen berm that blocks the line-of-sight between the Project Site and the residential neighborhood. Based on the distance and applying an attenuation factor of -15 dBA for the intervening building and elevated freeway, the highest calculated construction noise impact at this sensitive receptor is estimated to be 54.1 dBA $L_{eq}$, which is 10.1 dBA $L_{eq}$ below the ambient noise level at this receptor location. As such, on-site construction noise levels would not exceed 5 dBA $L_{eq}$ at a noise-sensitive receptor location, and construction noise levels at Receptor 2 would be less than significant.

Sensitive Receptor 3, identified as the L.A. River Lofts Apartments located at 2943 Gleneden Street, is situated approximately 450 feet west of the Project Site. This receptor is on the west bank of the Los Angeles River, which, in the vicinity of the Project Site, is improved as a soft bottom river with concrete sides. No structures or topography break the line-of-sight between the Project Site and the receptor. Based on the distance attenuation factor alone, the highest calculated construction noise impact at this sensitive receptor is estimated to be 60.6 dBA $L_{eq}$, which is 0.4 dBA $L_{eq}$ above the ambient noise level at this receptor location. As such, on-site construction noise levels would not exceed 5 dBA $L_{eq}$ at a noise-sensitive receptor location, and construction noise levels at Receptor 3 would be less than significant.

The property to the south of the Project Site, which is owned by the California State Parks, is currently vacant and not operational as a recreational use. This property, named the Bowtie Park Project, was identified as Related Project No. 13 in Table III-2 in Section III, Environmental Setting. As no development plans have yet to be defined for this parcel, it is anticipated that it would remain vacant during the construction of the proposed Project. As such, the proposed Project's construction activities would not result in any adverse impacts to this adjacent property. With respect to the property located immediately to the north of the Project Site at 2904 Casitas Avenue, it is currently operated as a commercial storage facility and is not considered a sensitive noise receptor. As such, construction noise impacts upon this property would be less than significant.

***In summary, the proposed Project's construction noise activities would increase exterior ambient noise levels at off-site noise-sensitive receptors by a maximum of 3.1 dBA $L_{eq}$. Since the construction noise impacts would be below the 5 dBA $L_{eq}$ significance criterion at all three sensitive receptors, construction noise impacts would be considered less than significant.***

*(b) Off-Site Construction Noise*

In addition to the on-site construction noise sources addressed above, which are regulated under the City's Noise Ordinance, other noise sources may be generated off-site resulting from materials delivery, concrete mixing trucks, haul trucks, and construction trucks from workers accessing the Project Site during construction. The highest level of noise from these noise sources would be generated by haul trucks for demolition debris and soil export during the first four months of construction. It is anticipated that the proposed haul route to and from I-5 would utilize Casitas Avenue and Carillon Street to Fletcher Drive, then to the Fletcher Drive on- and off-ramps of I-5 (northbound and southbound), and dispose waste at the Sunshine Canyon Landfill. See Figure IV.G-3, Haul Routes to and from I-5.

Based on the total volume of construction/demolition debris and soil hauling, (i.e., 170,000 square feet of demolition debris during the demolition phase, 3,000 cubic yards (cy) of asphalt debris during the site preparation phase, and 10,000 cy soil export and 10,000 cy of soil import during the grading/excavation phase), the highest number of haul trips would occur during the grading/excavation phase. Assuming an average of 14 cy per haul truck, the soil export and import during the two-month grading/excavation phase would generate approximately 2,858 one-way haul trips, or roughly 66 trips per day (33 inbound and 33 outbound)[14] distributed over an approximate two-month period. The addition of 66 haul trucks per day would generate an approximate 9-percent increase in traffic noise levels at the least traveled street segment along the designated haul route.[15] Table IV.G-10, below, shows the estimated increase in noise levels from the addition of haul truck trips along the haul route's street segments. As shown, the highest increase in noise levels would be along Carillon Street, which is estimated to increase noise levels by 3.42 dBA CNEL above the existing ambient noise levels. Haul truck noise increase would be below the significance criteria for the haul route's street segments. ***As such, the hauling activities during construction would result in a less-than-significant impact to off-site noise receptors.***

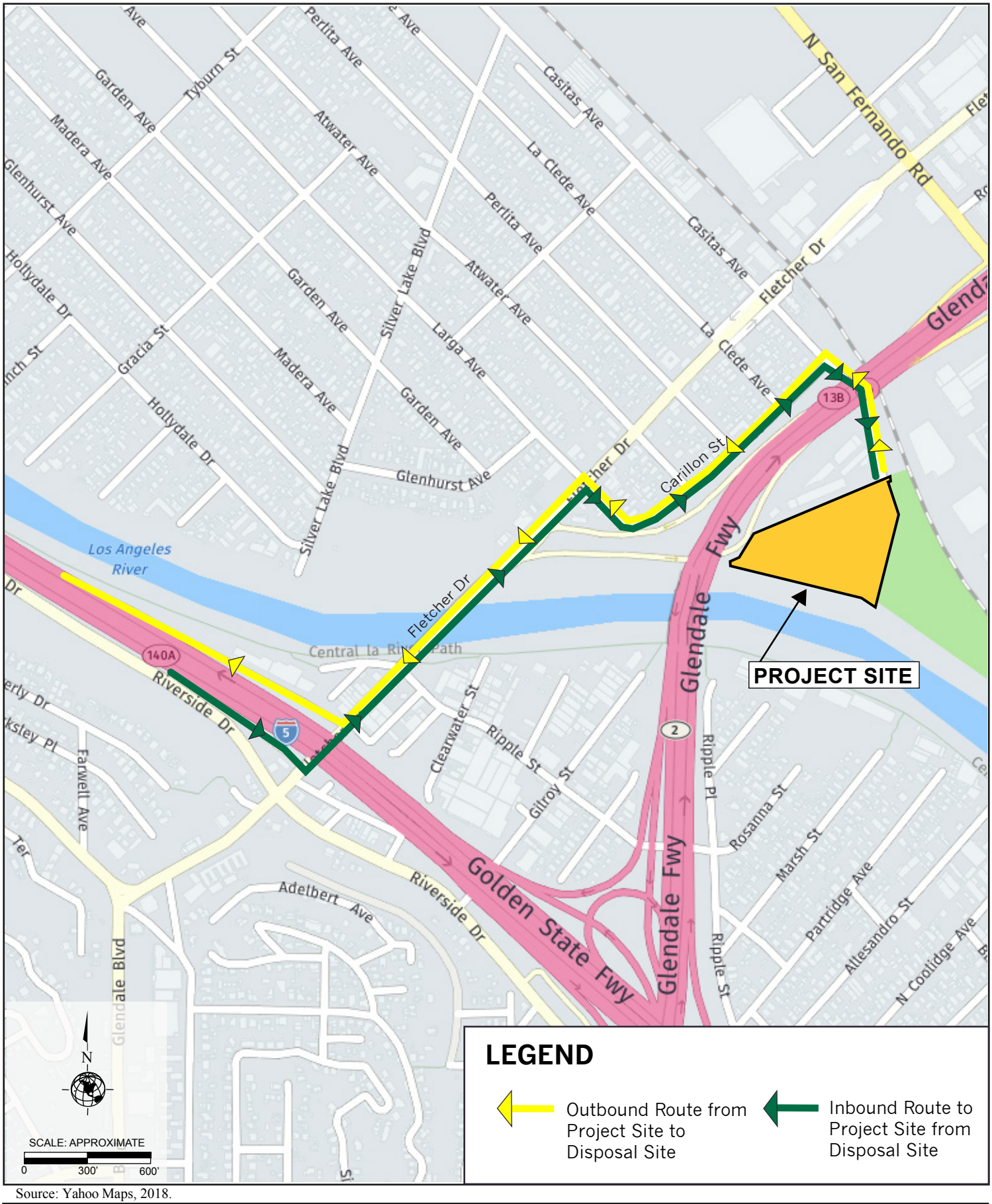
**Table IV.G-10**
**Predicted Roadway Noise Levels From Haul Trips**

| Construction Phase | Estimated Number of Haul Truck Trips per Day | Noise Level | Estimated Noise Level along Project Haul Routes (dBA $L_{eq}$) | | |
|---|---|---|---|---|---|
| | | | Carillon Street | Larga Avenue | Fletcher Drive |
| Grading/Excavation Phase | 66 | Existing Conditions | 55.20 | 56.70 | 57.50 |
| | | Existing plus Haul Trucks | 57.88 | 59.23 | 71.92 |
| **Significance Criteria (> 5dBA Leq):[a]** | | | **60.20** | **61.70** | **62.50** |
| **Significant Impact?** | | | **No** | **No** | **No** |

*Notes:*
*[a] City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.1-3.*
*Source: Parker Environmental Consultants. TNM noise calculation worksheets are provided in Appendix G to the EIR.*

[14] *With 20,000 cy of total soil import/export, there would be 2,858 one-way haul trips based on 14-cy haul truck capacity (20,000 cy/ 14 cy per truck = 1,429 one way trips, x2 = 2,825 two way trips). 2,825 trips /44 days = 65 daily trips and rounded up to 66 total daily trips assuming 33 trips leaving the Project Site and 33 trips arriving at the Project Site.*

[15] *As shown in Appendix G, Off-Site Traffic Noise levels, the estimated average daily traffic on Carillon Street between La Clede Avenue and Casitas Avenue is 718 ADT (66 / 718 = 0.09).*




Source: Yahoo Maps, 2018.

Figure IV.G-3
Haul Routes to and from I-5

## (2) Operational Noise Impacts

Operation of the proposed Project would have the potential to increase ambient noise levels through the increase in vehicle trips entering and leaving the Project Site (i.e., roadway noise), outdoor plazas and gathering spaces (including restaurants with outdoor seating) that have the potential to attract people and utilize amplified music, and building mechanical equipment (i.e., HVAC systems), and on-site loading dock and parking structure noise. A discussion of these potential impact sources is provided below.

### *(a) Roadway Noise*

#### *(i) Existing Plus Project*

The proposed Project would generate an increase in vehicle trips to and from the Project Site, which would have the potential to increase roadway traffic noise on the surrounding roadways. As noted in the Project Traffic Study, the proposed Project is anticipated to generate a total of 2,551 daily vehicle trips, including 199 AM peak hour trips and 239 PM peak hour trips. Using the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) and traffic volume data from the Traffic Impact Study,[16] the proposed Project's roadway noise impacts were calculated at 18 street segments in the Project vicinity previously identified in Subsection 2.b, Existing Conditions, above. As shown in Table IV.G-11, below, roadway noise impacts were determined by comparing the relative increase in roadway noise levels based on a comparison of the Existing (2017) conditions and Existing With Project conditions, and comparing the noise level impact to the applicable thresholds pursuant to the Community Noise Exposure Guidelines discussed above. A summary of the proposed Project's roadway traffic noise levels is provided in Table IV.G-11, below.

As shown in Table IV.G-11, the proposed Project would result in a less-than-significant roadway noise impact at 16 of the 18 street segments analyzed. Two of the local streets would, however, experience roadway noise level impacts that exceed the ambient predicted noise level by more than 5 dBA CNEL and, thus, would be considered a significant impact. Larga Avenue (between Fletcher Drive and Carillon Street) would experience an approximate 5.7-dBA CNEL increase, which is 0.7 dBA CNEL above the threshold. La Clede Avenue (between Fletcher Drive and Carillon Street) would experience an approximate 7.2-dBA CNEL increase, which is 2.2 dBA CNEL above the threshold. Additionally, these roadways are fronted by single-family homes, which are

[16] *The Traffic Impact Study is provided in Appendix J.2 to this EIR.*

**Table IV.G-11**
**Existing and Predicted Project Roadway Traffic Noise Levels**

| | Roadway Segment | Existing (2017) CNEL (dBA) at the Edge of Right-of-Way | Existing + Project CNEL (dBA) at the Edge of Right-of-Way | Significance Criteria CNEL (dBA)[a] | Impact CNEL (dBA) | Significant Impact? |
|---|---|---|---|---|---|---|
| **Fletcher Drive** | | | | | | |
| 1 | Between Ave. 34 and Estara Ave. | 67.2 | 67.3 | 70.2 | 0.1 | No |
| 2 | Between Estara Ave. and San Fernando Rd. | 69.9 | 70.0 | 72.9 | 0.1 | No |
| 3 | Between San Fernando Rd. and La Clede Ave. | 70.4 | 70.7 | 73.4 | 0.3 | No |
| 4 | Between La Clede Ave. and Larga Ave. | 69.3 | 69.7 | 72.3 | 0.4 | No |
| 5 | Between Larga Ave. and SR-2 SB Off Ramp | 69.1 | 69.3 | 72.1 | 0.2 | No |
| 6 | Between SR-2 Off-Ramp and Ripple St. | 72.5 | 72.6 | 75.5 | 0.1 | No |
| 7 | Between Ripple St. and Riverside Dr. | 71.9 | 72.0 | 74.9 | 0.1 | No |
| 8 | Between Riverside Dr. and Glendale Blvd. | 72.0 | 72.1 | 75.0 | 0.1 | No |
| **Glendale Boulevard** | | | | | | |
| 9 | Between Fletcher Dr. and Silver Lake Blvd. | 72.5 | 72.5 | 74.1 | 0.0 | No |
| 10 | Between Lakewood Ave. and Fletcher Dr. | 69.5 | 70.0 | 72.5 | 0.5 | No |
| **Riverside Drive** | | | | | | |
| 11 | Between Glendale Blvd. and Fletcher Dr. | 69.6 | 69.6 | 72.6 | 0.0 | No |
| 12 | Between Fletcher Dr. and Gilroy St. | 69.0 | 69.3 | 72.0 | 0.3 | No |
| **San Fernando Road** | | | | | | |
| 13 | Between Glendale Ave. and Fletcher Dr. | 66.6 | 66.7 | 69.6 | 0.1 | No |
| 14 | Between Fletcher Dr. and SR-2 | 66.9 | 67.0 | 69.9 | 0.1 | No |
| 15 | Between SR-2 and Edward Way | 70.9 | 71.0 | 73.9 | 0.1 | No |
| **Carillon Street** | | | | | | |
| 16 | Between Larga Ave. and Casitas Ave. | 54.4 | 57.8 | 59.4 | 3.4 | No |
| **Larga Avenue** | | | | | | |
| 17 | Between Fletcher Dr. and Carillon St. | 56.7 | 62.4 | 61.7 | 5.7 | Yes |
| **La Clede Avenue** | | | | | | |
| 18 | Between Fletcher Dr. and Carillon St. | 56.9 | 64.1 | 61.9 | 7.2 | Yes |

*Notes:*
*[a] The thresholds of significance are either a 3-dBA CNEL or greater increase over ambient noise levels for land uses that would be impacted to or within the "normally unacceptable" or "clearly unacceptable" range (as identified in Table IV.G-4), or a 5-dBA CNEL or greater noise increase.*
*Source: Parker Environmental Consultants. TNM noise calculation worksheets are provided in Appendix G to the EIR.*

considered noise-sensitive land uses. ***As such, the Project's roadway noise impacts at the Larga Avenue and La Clede Avenue street segments would be considered significant.***

*(ii) Future Plus Project*

The analysis of future roadway noise impacts was based on the incremental increase in traffic roadway noise levels attributable to the proposed Project based on a comparison of future with project traffic volumes to existing conditions. However, as the proposed Project's anticipated buildout year is 2023, the existing roadway noise would be affected by cumulative growth between 2017 and 2023. As such, the following analysis was also performed to determine the potential noise impacts based on the increase in roadway noise levels as compared to the future without project conditions in 2023. As summarized in Table IV.G-12, Future Baseline (2023) Predicted Project Roadway Traffic Noise Levels, impacts would be similar to the Existing Plus Project conditions described above. Under the Future Plus Project Scenario, the proposed Project would result in a less-than significant roadway noise impact at 16 of the 18 street segments analyzed. Two of the local streets would, however, experience roadway noise level impacts that exceed the ambient predicted noise level by more than 5 dBA CNEL and, thus, would be considered a significant impact. Larga Avenue (between Fletcher Drive and Carillon Street) would experience an approximate 5.7-dBA CNEL increase, which is 0.7 dBA CNEL above the threshold. La Clede Avenue (between Fletcher Drive and Carillon Street) would experience an approximate 7.2-dBA CNEL increase, which is 2.2 dBA CNEL above the threshold. Additionally, these roadways are fronted by single-family homes, which are considered noise-sensitive land uses. ***As such, the Project's roadway noise impacts at the Larga Avenue and La Clede Avenue street segments would be considered significant.***

*(b) Outdoor Activity Noise Levels*

Noise levels from outdoor activities were determined based on a prediction of the combined noise impact from the proposed Project's outdoor noise sources. Sources of outdoor noise due to human activities and uses include gatherings within the open-air amenity courtyard between Buildings B and C and the outdoor patio seating areas of the restaurant spaces in Buildings B and D.

## Table IV.G-12
## Future Baseline (2023) Predicted Project Roadway Traffic Noise Levels

| | Roadway Segment | Future (2023) Without Project CNEL (dBA) at the Edge of Right-of-Way | Future (2023) With Project CNEL (dBA) at the Edge of Right-of-Way | Significance Criteria CNEL (dBA)[a] | Impact CNEL (dBA) | Significant Impact? |
|---|---|---|---|---|---|---|
| **Fletcher Drive** | | | | | | |
| 1 | Between Ave. 34 and Estara Ave. | 67.6 | 67.7 | 70.6 | 0.1 | No |
| 2 | Between Estara Ave. and San Fernando Rd. | 70.3 | 70.3 | 73.3 | 0.0 | No |
| 3 | Between San Fernando Rd. and La Clede Ave. | 70.8 | 71.0 | 73.8 | 0.2 | No |
| 4 | Between La Clede Ave. and Larga Ave. | 69.7 | 69.7 | 72.7 | 0.0 | No |
| 5 | Between Larga Ave. and SR-2 SB Off Ramp | 69.5 | 69.7 | 72.5 | 0.2 | No |
| 6 | Between SR-2 Off-Ramp and Ripple St. | 72.8 | 72.9 | 75.8 | 0.1 | No |
| 7 | Between Ripple St. and Riverside Dr. | 72.3 | 72.4 | 75.3 | 0.1 | No |
| 8 | Between Riverside Dr. and Glendale Blvd. | 72.3 | 72.4 | 75.3 | 0.1 | No |
| **Glendale Boulevard** | | | | | | |
| 9 | Between Fletcher Dr. and Silver Lake Blvd. | 72.9 | 72.9 | 75.9 | 0.0 | No |
| 10 | Between Lakewood Ave. and Fletcher Dr. | 69.6 | 69.6 | 72.6 | 0.0 | No |
| **Riverside Drive** | | | | | | |
| 11 | Between Glendale Blvd. and Fletcher Dr. | 69.9 | 69.9 | 72.9 | 0.0 | No |
| 12 | Between Fletcher Dr. and Gilroy St. | 69.3 | 69.3 | 72.3 | 0.0 | No |
| **San Fernando Road** | | | | | | |
| 13 | Between Glendale Ave. and Fletcher Dr. | 67.1 | 67.1 | 70.1 | 0.0 | No |
| 14 | Between Fletcher Dr. and SR-2 | 67.4 | 67.5 | 70.4 | 0.1 | No |
| 15 | Between SR-2 and Edward Way | 71.5 | 71.6 | 74.5 | 0.1 | No |
| **Carillon Street** | | | | | | |
| 16 | Between Larga Ave. and Casitas Ave. | 54.4 | 57.8 | 59.4 | 3.4 | No |
| **Larga Avenue** | | | | | | |
| 17 | Between Fletcher Dr. and Carillon St. | 56.7 | 62.4 | 61.7 | 5.7 | Yes |
| **La Clede Avenue** | | | | | | |
| 18 | Between Fletcher Dr. and Carillon St. | 56.9 | 64.1 | 61.9 | 7.2 | Yes |

*Notes:*
*[a] The thresholds of significance are either a 3-dBA CNEL or greater increase over ambient noise levels for land uses that would be impacted to or within the "normally unacceptable" or "clearly unacceptable" range (as identified in Table IV.G-8), or a 5-dBA CNEL or greater noise increase.*

*Source: Parker Environmental Consultants. TNM noise calculation worksheets are provided in Appendix G to the EIR.*

The proposed Project provides approximately 58,176 square feet of publicly available open space. A majority of the open space would be concentrated in a central community patio courtyard to be improved with a swimming pool, gas fire pits, and two barbeques. Based on the size of the courtyard and the type of amenities provided, it is anticipated that this area could accommodate up to 150 people for casual outdoor gatherings. For

purposes of estimating noise from people congregating in the central courtyard, reference noise levels of 65 dBA and 62 dBA ($L_{eq}$ at a distance of 3.3 feet) for a male and a female speaking in a raised voice, respectively, were used to analyze noise from the use of the outdoor central courtyard area. Assuming 150 individuals occupy this space at one time and up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time, the noise levels from activities would be approximately 82.5 dBA $L_{eq}$ within the courtyard.[17] The central courtyard is bounded by and nearly enclosed on all sides by Building B and Building C, which are approximately 66.5 feet high above grade. As such, most of the noise generated within this courtyard would be attenuated by the surrounding buildings. Assuming an approximate 10-dBA attenuation rate from the interior to exterior of the courtyard, the noise permeating through the courtyard would be approximately 72.5 dBA $L_{eq}$.

The proposed Project has two commercial restaurant spaces that would include outdoor seating. As noted in Section, II, Project Description, the proposed Project includes a proposed restaurant with 1,435 square feet of interior space and 838 square feet of exterior space, and 104 total seats, inclusive of outdoor seating; and a proposed beer garden with 845 square feet of interior space and 1,951 square feet of exterior space, and 105 total seats, inclusive of outdoor seating. The restaurant would include 38 outdoor seats and the beer garden would include 68 outdoor seats. These areas are proposed on the ground floor of Buildings D (for the beer garden) and Building B (for the restaurant) and are located on the south end of the Project Site overlooking the Los Angeles River. Based on the estimated number of people to occupy these outdoor seating areas and the methodology applied above for estimating noise generated by people congregating and speaking casually in a common area, it is anticipated that the outdoor levels generated by people on the outdoor restaurant and beer garden patios would be 76.5 and 79.1 dBA $L_{eq}$, respectively, within 50 feet from the source.

The noise levels of the outdoor use areas combined were calculated by combining all three noise levels (i.e., courtyard, outdoor restaurant, and beer garden patio) and calculating the projected noise levels at the three nearest sensitive receptor locations (identified in Figure IV.G-1) factoring distance between the source and receptor and building attenuation. As discussed above, outdoor amplified sound systems (e.g., speaker and stereo systems or other sound producing devices) will be designed so as not to exceed 5 dBA (hourly $L_{eq}$) above ambient noise levels at any off-site noise-sensitive receptor (see Project Design Feature NOI-PDF-4, above). Additionally, the perimeter of the outdoor restaurant seating areas will be designed with a five-foot high glass, plexiglass, or other solid barrier to confine noise within the outdoor seating area (see

[17] *Cyril M. Harris, Handbook of Acoustical Measurements and Noise Control, Third Edition, 1991. See Noise calculation worksheets in Appendix G.*

Project Design Feature NOI-PDF-5, above). As shown in Table IV.G-13, below, the anticipated outdoor noise impacts at the nearest noise-sensitive receptors would not exceed the significance criteria noise level at any of the sensitive receptors. ***As these noise levels would not exceed 5 dBA above the respective ambient noise level threshold for daytime or nighttime noise, noise impacts from outdoor activities would be less than significant at nearby sensitive receptors.***

**Table IV.G-13**
**Estimated Outdoor Noise Levels for Nearest Sensitive Receptors**

| SR ID [a] | Ambient Noise Levels [b] | Outdoor Open Space Noise Levels (dBA $L_{eq}$) | Ambient + Project Noise Levels (dBA ($L_{eq}$)) | Threshold of Significance Criteria [c] | Exceedance Over Significance Criteria | Significant Impact? |
|---|---|---|---|---|---|---|
| **Daytime Noise Levels** | | | | | | |
| 1 | 55.3 | 48.24 | 56.1 | 60.3 | **0** | **No** |
| 2 | 58.7 | 39.60 | 58.8 | 63.7 | **0** | **No** |
| 3 | 60.2 | 51.12 | 60.7 | 65.2 | **0** | **No** |
| **Evening Noise Levels** | | | | | | |
| 1 | 65 | 48.24 | 65.1 | 70.0 | **0** | **No** |
| 2 | 40 | 39.60 | 42.8 | 45.0 | **0** | **No** |
| 3 | 55 | 51.12 | 56.5 | 60.0 | **0** | **No** |

*Notes*

[a] *See Figure IV.G-1, Noise Monitoring and Sensitive Receptor Location Map.*

[b] *The daytime ambient noise levels are based on the noise measurements previously identified in Table IV.G-6. The nighttime ambient noise levels are based on the presumed nighttime ambient noise levels for the sensitive receptor locations pursuant to LAMC Section Table 111.03. For purposes of determining significant impacts the lower of the daytime or nighttime noise levels should be applied.*

[c] *The significance criteria are based on the ambient noise levels plus 5 dBA.*

*Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006 and Caltrans' Technical Noise Supplement, September 2013. Parker Environmental Consultants, 2019. (See calculation worksheets in Appendix G to this EIR.)*

### *(c) Mechanical Equipment and HVAC Noise Levels*

As part of the proposed Project, new mechanical equipment, HVAC units, and exhaust fans would be installed on the roof of the proposed new structures. Although the operation of this equipment would generate noise, the design of these on-site HVAC units and exhaust fans would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, the on-site equipment would be designed such that they would be shielded, and appropriate noise muffling devices would be installed on the equipment to reduce noise levels that affect nearby uses. In addition, nighttime noise limits would be applicable to any equipment items required to operate between the hours of 10:00 P.M. and 7:00 A.M.

Table IV.G-14, below, shows the predicted noise levels from on-site mechanical equipment at nearby sensitive receptors. Based on estimated A-weighted noise ratings published for standard HVAC equipment,[18] sound power from rooftop mounted HVAC equipment would be expected to range from 69 dBA $L_{eq}$ to 74 dBA $L_{eq}$ at the source. By converting a 74-dBA sound power level at a source to sound pressure levels at 50 feet, the sound pressure level would be approximately 39.9 dBA.[19] Since the HVAC equipment would most likely operate for 24 hours a day, the presumed ambient noise levels for nighttime were used for a baseline noise level as a conservative estimate. Based on the approximate distances to the nearby sensitive receptors, the estimated noise levels at nearby sensitive receptors would range from 40.1 dBA $L_{eq}$ to 40.2 dBA $L_{eq}$, which would be below the 5-dBA $L_{eq}$ increase above ambient noise levels at the sensitive receptors. ***As such, noise from mechanical equipment would be less than significant at nearby sensitive receptors.***

**Table IV.G-14**
**Estimated Noise Levels from Mechanical Equipment**

| No. [a] | Sensitive Land Use | Distance to Project Site (feet) | Presumed Ambient Noise Levels (dBA $L_{eq}$) | Estimated Exterior Peak HVAC Noise Levels (dBA $L_{eq}$) | Ambient + HVAC Noise Levels (dBA $L_{eq}$) | Significant Impact? |
|---|---|---|---|---|---|---|
| 1 | Los Feliz Charter School for the Arts; 2709 Media Center Drive | 230 | 40.0 | 26.6 | 40.2 | No |
| 2 | Residential neighborhood west of SR-2 along Carillon Street | 350 | 40.0 | 40.1 | 40.1 | No |
| 3 | L.A. River Lofts Apartments; 2943 Gleneden Street | 450 | 40.0 | 40.1 | 40.1 | No |

*Notes:*
*[a] See Figure IV.G-1, Noise Monitoring and Sensitive Receptor Location Map.*

*Source: Parker Environmental Consultants, calculation worksheets are provided in Appendix G to the EIR.*

*(d) Loading Dock, Trash Collection, and Parking Garage Noise*

The primary entrance to the parking garage would be from Casitas Avenue at the northeast end of the Project Site. As discussed in Section II, Project Description, the proposed Project would provide 720 on-site parking spaces in a 7-level above grade

[18] *Carrier Corporation, Product Data Sheet for 25HBC5 Base 15 Heat Pump with Puron Refrigerant (1 ½ to 5 Nominal Tons, Edition Date 9/11. .*

[19] *Daikin, HVAC Acoustic Fundamentals, Application Guide 31-010, Calculating Sound Pressure from Sound Power, at pg. 16.*

parking garage. Parking structures generate noise from vehicle engines, tires squealing, doors closing, car alarms, and people talking. Noise levels within the garage structure would fluctuate based on the types of simultaneous noise sources and the overall level of activity within the garage. Noise levels are anticipated to be highest during the A.M. and P.M. peak hours, corresponding to the volumes of Project-generated traffic as reported in Section IV.K, Traffic/Transportation. As noted in Section IV.K, Traffic/Transportation, the proposed Project's highest peak hourly traffic volumes would be 239 vehicles, generated during the P.M. commuter peak hour. Using the recommended methodology for calculating parking structure noise as published by the U.S. Department of Transportation (USDOT), FTA,[20] the predicted noise levels from the parking garage for the highest peak hour were estimated. The parking garage would also serve as a loading dock and trash collection areas for the proposed urban farm/greenhouse operations that are proposed on the rooftop level (Level 7) of the parking garage. Based on measured noise levels from typical loading dock facilities and trash collection areas, noise levels within the lower level of the parking structure would be expected to range from 72.0 dBA $L_{eq}$ to 66 dBA $L_{eq}$ at a distance of 50 feet.[21] The combined noise level from loading dock and parking garage activities were then calculated and added to the ambient noise levels at the three identified sensitive receptors. As shown in Table IV.G-15, the estimated existing ambient plus Project noise levels from the parking garage and trash compactor would not exceed the 5-dBA increase above ambient noise levels threshold at all three sensitive receptor locations. It should be noted that the calculations provided below are conservative as they do not account for any attenuation resulting from intervening structures and assume the highest trips during the PM peak hour. During the late evening and early morning hours (10 PM to 7 AM), it is assumed that the number of trips entering and exiting the parking structure would be significantly less than the trips during the peak hours. Therefore, noise from the parking garage would not impact the surrounding residential neighborhoods during the late evening and early morning hours. ***As such, noise from the parking structure would be less than significant at nearby sensitive receptors.***

[20] *U.S. Department of Transportation, Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

[21] *RK Engineering Group, Inc., Wal-Mart/Sam's Club Reference Noise Level Study, 2003.*

**Table IV.G-15**
**Estimated Noise Levels from Parking Garage**

| No.[a] | Sensitive Land Use | Existing Ambient Noise Levels (dBA $L_{eq}$) | Parking Garage Noise (dBA $L_{eq}$) | Trash Compactor Noise (dBA $L_{eq}$) | Ambient + Project Noise dBA $L_{eq}$ | Significance Threshold dBA $L_{eq}$ [b] | Significant Impact? |
|---|---|---|---|---|---|---|---|
| 1 | Los Feliz Charter School for the Arts; 2709 Media Center Dr. | 55.3 | 54.4 | 48.4 | 58.3 | 60.3 | No |
| 2 | Residential neighborhood west of the Glendale Fwy. along Carillon St. | 58.7 | 49.5 | 43.5 | 59.3 | 63.7 | No |
| 3 | L.A. River Lofts Apartments; 2943 Gleneden St. | 60.2 | 46.6 | 40.6 | 60.4 | 65.2 | No |

*Notes:*
*[a] See Figure IV.G-1, Noise Monitoring and Sensitive Receptor Location Map.*
*[b] The significance thresholds is defined by a 5 dBA or greater noise increase from the ambient noise level.*
*Source: Parker Environmental Consultants, calculation worksheets are provided in Appendix G to the EIR.*

*(e) Composite Noise Levels*

On-site noise sources associated with the proposed Project would include the outdoor courtyard, outdoor restaurant, outdoor beer garden, mechanical HVAC equipment, the parking structure, loading dock, and trash compactor. Composite noise levels were estimated to analyze the impact from the combination of all on-site noise sources from the Project Site to the surrounding sensitive receptors. Table IV.G-16, Estimated Composite Noise Levels for Nearest Sensitive Receptors, shows the 24-hour CNEL from all on-site sources and estimates the total composite noise levels at the surrounding sensitive receptors from the Project Site. When analyzed together, the proposed Project would have a maximum CNEL increase of 4.16 dBA for Sensitive Receptor No. 1, the Los Feliz Charter School to the northeast. Therefore, it is anticipated that the combination of operational activities from the proposed Project would not exceed the 5-dBA increase threshold for any of the sensitive receptors. ***Therefore, the proposed Project would not increase ambient noise levels by 5 dBA, and a less than significant impact would occur.***

**Table IV.G-16**
**Estimated Composite Noise Levels for Nearest Sensitive Receptors**

| SR ID [a] | Ambient CNEL | Estimated Project-Related CNEL at Receptor | | | | | | | Composite CNEL | Threshold [b] | Composite + Ambient CNEL |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Outdoor Courtyard | Outdoor Restaurant | Outdoor Beer Garden | HVAC System | Parking Garage | Loading Dock | Trash Compactor | | | |
| 1 | 53.97 | 50.86 | 44.97 | 51.81 | 39.90 | 49.36 | 47.34 | 43.01 | **56.03** | **58.97** | **58.13** |
| 2 | 57.00 | 46.01 | 40.12 | 46.96 | 39.90 | 44.51 | 42.49 | 38.16 | **51.39** | **62.00** | **58.06** |
| 3 | 58.40 | 43.11 | 47.22 | 54.06 | 39.90 | 41.60 | 39.58 | 35.26 | **55.46** | **63.40** | **60.19** |

*Notes:*
*All noise levels are estimated CNEL dBA.*
[a] *See Figure IV.G-1, Noise Monitoring and Sensitive Receptor Location Map.*
[b] *Significance thresholds are based on the ambient CNEL plus 5 dBA since the existing ambient CNEL are within the "normally acceptable" and "conditionally acceptable" categories.*
*Source: CNEL Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006; Formulas for adding sound levels based on Caltrans' Technical Noise Supplement, September 2013.*
*Parker Environmental Consultants, 2018.*

### (3) Mitigation Measures

No feasible mitigation measures have been identified to effectively mitigate the significant operational roadway noise impacts that are projected to occur. Measures, such as speed humps, curb extensions, and bulbouts, could be employed to slow down traffic. However, they would be unlikely to divert any traffic. Speed humps would also have the undesirable effect on increasing noise on local streets. As such, these measures would be ineffective in addressing the Project's roadway noise impacts and are not recommended.

### (4) Level of Significance After Mitigation

Project on-site and off-site noise and groundborne vibration impacts associated with the proposed Project would be less than significant. Noise levels from the on-site operational noise sources would be less than significant. Operational impacts associated with groundborne vibration resulting from the proposed Project would be less than significant. As discussed above, proposed Project impacts related to local roadway noise would be significant and unavoidable.

***Threshold (b): Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels?***

### (1) Construction

Construction activities that would occur within the Project Site would have the potential to generate low levels of groundborne vibration on a temporary and intermittent basis during construction. Table IV.G-17, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate during the construction of the proposed Project. In accordance with the project design features, Project construction will not use impact pile driving methods and, as such, potential vibration impacts from impact pile driving activities was excluded from this construction vibration analysis (see Project Design Feature NOI-PDF-2, above). Based on the information presented in Table IV.G-17, below, vibration velocities could reach as high as approximately 0.089 inches per second (in/sec) PPV at 25 feet from the source activity, depending on the type of construction equipment in use. This corresponds to a RMS velocity level (in VdB) of 87 VdB at 25 feet from the source activity. Per FTA guidance, under conditions where there are a frequent number of events per day (such as construction), the significance criteria for human annoyance from vibration are 72 VdB at residences and buildings where people normally sleep and 75 VdB at institutional buildings with primarily daytime use. Therefore, specific construction equipment may cause significant human annoyance from vibration depending on the distance from the receptor to the source of construction equipment.

**Table IV.G-17**
**Vibration Source Levels for Construction Equipment**

| Equipment | Approximate PPV (in/sec) | | | | Approximate RMS (VdB) | | | |
|---|---|---|---|---|---|---|---|---|
| | 25 Feet | 50 Feet | 75 Feet | 100 Feet | 25 Feet | 50 Feet | 75 Feet | 100 Feet |
| Large Bulldozer | 0.089 | 0.031 | 0.017 | 0.011 | 87 | 78 | 73 | 69 |
| Caisson Drilling | 0.089 | 0.031 | 0.017 | 0.011 | 87 | 78 | 73 | 69 |
| Loaded Trucks | 0.076 | 0.027 | 0.015 | 0.010 | 86 | 77 | 72 | 68 |
| Jackhammer | 0.035 | 0.012 | 0.007 | 0.004 | 79 | 70 | 65 | 61 |
| Small Bulldozer | 0.003 | 0.001 | 0.0006 | 0.0004 | 58 | 49 | 44 | 40 |

*Note: in/sec = inches per second.*
*Source: FTA, Transit Noise and Vibration Impact Assessment, Final Report, 2006.*

(a) *Human Annoyance Impacts from On-Site Construction Vibration*

As discussed above, per FTA guidance, under conditions where there are a frequent number of events per day (such as construction), the significance criteria for human annoyance from vibration are 72 VdB at residences and buildings where people normally sleep and 75 VdB at institutional buildings with primarily daytime use. Persons in the multi-family residential buildings south of the Project Site, the residential neighborhoods west of the Project Site, and the students and staff of the Los Feliz Charter School for the Arts could be exposed to increased vibration levels on a temporary and intermittent basis during the construction period. However, several barriers are located between the identified sensitive receptors and the Project Site that would help to attenuate groundborne vibration. For example, the railroad Right-of-Way and an earth berm separate the Los Feliz Charter School from the Project Site. The SR-2 Freeway and earth berm separate the residential neighborhood along Carillon Street from the Project Site, and the Los Angeles River is located between the River Lofts and the Project Site. These land characteristics would help attenuate groundborne vibration to these sensitive receptors. Additionally, groundborne vibration is further attenuated when traveling through an unpaved surface compared to a surface that is paved with cement or asphalt. Table IV.G-18, Estimated Vibration Human Annoyance Levels at Nearest Sensitive Receptors, shows the construction-generated vibration levels experienced at the sensitive receptors identified in Figure IV.G-1, Noise Monitoring and Sensitive Receptors Location Map. As shown in Table IV.G-18, construction generated vibration would be below the applicable significance criteria for human annoyance and would, therefore, not be a potential source of human annoyance to any of the nearby sensitive receptors. Vibration levels at sensitive receptors located farther away from the Project Site would be even lower. ***As such, human annoyance impacts with respect to construction-generated vibration increases would be less than significant.***

**Table IV.G-18**
**Estimated Vibration Human Annoyance Levels at Nearest Sensitive Receptors**

| No.[a] | Sensitive Land Use | Distance from Project Site (ft) | Estimated Vibration Levels (VdB) | Significance Criteria | Significant Impact? |
|---|---|---|---|---|---|
| 1 | Los Feliz Charter School for the Arts – 2709 Media Center Drive | 230 | 58.09 | 75 | No |
| 2 | Residential neighborhood west of the Glendale Fwy. along Carillon St. | 350 | 52.62 | 72 | No |
| 3 | L.A. River Lofts apartments 2943 Gleneden Street | 450 | 49.34 | 72 | No |

*Notes:*
*[a] See Figure IV.G-1, Noise Monitoring and Sensitive Receptor Location Map.*

*Source: Calculation based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak vibration levels at the nearby sensitive receptors during project construction represent the highest instantaneous vibration level that would be generated periodically during a worst-case construction activity and do not represent continuous vibration levels occurring throughout the construction day or period.*
*Parker Environmental Consultants, 2017.*

*(b) Building Damage Impacts from On-Site Construction Vibration*

The adjacent properties to the north (self-storage facility) and south (vacant, future parkland) would not be considered sensitive to the effects of groundborne vibration similar to the effects of construction noise. As such, building damage from groundborne vibration impacts upon these properties would be less than significant.

For purposes of assessing potential groundborne vibration impacts with respect to structural damage, two adjacent properties were identified as having structures in proximity to the Project Site to warrant analysis; the Extra Space Self-Storage facility at 2904 Casitas Avenue and the railroad tracks within the Metro Right-of-Way. The self-storage facility is a two-story structure of modern construction and is separated from the Project Site by a 25-foot building setback and driveway access lane. The Metro Right-of-Way easement is located approximately 100 feet to the east of the Project Site. As required by ZI-1117, consultation with Metro is required prior to the issuance of any building permit for projects within 100 feet of Metro-owned Rail Right-of-Way. As set forth in Table IV.G-19, the vibration levels at each of the closest sensitive receptors would be a maximum of 0.09 in/sec PPV, well below the applicable significance threshold for building or foundational damage. Vibration levels at sensitive receptors located farther away from the Project Site would be even lower. ***As such, impacts with regard to building damage from construction vibration would be less than significant.***

**Table IV.G-19**
**Estimated Structural Vibration Damage Levels at Nearest Structures**

| No.[a] | Sensitive Land Use | Distance from Project Site (ft) | Estimated Vibration Levels (in/sec PPV ) | Threshold of Significance | Significant Impact |
|---|---|---|---|---|---|
| 1 | Extra Space Self Storage Facility 2904 Casitas Avenue | 25 | 0.09 | 0.5 | No |
| 2 | Metro Right-of-Way | 100 | 0.02 | 0.5 | No |

*Source: Calculations based on Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment (Harris, Miller, Miller & Hanson, 2006).*
*Parker Environmental Consultants, 2017.*

*(c) Off-site Construction Vibration Impacts*

During the course of the combined excavation and other construction activities, it is estimated that a total of approximately 20,000 cubic yards (cy) of soil material would be transported to and from the site (10,000 cy of soil import and 10,000 cy of soil export), and approximately 170,000 square feet of demolition debris, and 3,000 cy of asphalt debris would be exported to a landfill located within the City. It is anticipated that 14 cy capacity haul trucks would be used to export the soil and construction/demolition debris. It is assumed that haul truck trips would occur uniformly predominately outside of peak hours. A Haul Truck Route would be identified for the proposed Project and approved by LADOT as part of the Construction Traffic Control/Management Plan (refer to Project Design Features PDF-TRANS-1 and PDF-TRANS-2). The proposed haul route traveling to and from I-5 would utilize Casitas Avenue and Larga Avenue (between Casitas Avenue and Fletcher Drive) and Fletcher Drive between Larga Avenue and the I-5 on- and off-ramps. Trucks and buses typically generate groundborne vibration velocity levels of around 63 VdB at 50 feet. These residents already experience trucks leaving and entering the existing manufacturing and production uses on the Project Site. ***Therefore, haul trucks traveling along Larga Avenue are not expected to significantly increase vibration impacts to these residents. Also, since haul truck loading and unloading activities would occur on-site and/or within the boundaries of an approved Construction Traffic Control/Management Plan and during the acceptable hours as required by the Noise Ordinance and Project Design Feature NOI-PDF-1, the vibration impacts from haul trucks would be considered less than significant.***

### (2) Operation

#### *(a) Human Annoyance Impacts from Operational Vibration*

The proposed Project would include a mixed-use residential and commercial development that would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large manufacturing and industrial projects. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on nearby local roadways, the proposed land uses at the Project Site would not result in the increased use of these heavy-duty vehicles on the public roadways. Heavy-duty refuse trucks typically generate groundborne vibration velocity levels of around 63 VdB at 50 feet, which is less than the human annoyance threshold levels of 72 VdB at residences and buildings where people normally sleep and 75 VdB at institutional buildings. Therefore, vehicular-induced vibration is unlikely to be perceptible by nearby residents and the nearby charter school. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur a few times a week and would not be any different than those presently occurring in the vicinity of and on the Project Site. ***As such, human annoyance vibration impacts associated with operation of the proposed Project would be less than significant.***

#### *(b) Building Damage Impacts from Operational Vibration*

Heavy-duty refuse trucks typically generate groundborne vibration velocity levels of around 63 VdB at 50 feet, which is equivalent to approximately 0.008 in/sec PPV. As shown in Table IV.G-19, the thresholds levels for building damage for the Extra Space Self-Storage facility and the Metro Right-of-Way are 0.05 in/sec PPV. The estimated groundborne vibration velocity levels from refuse trucks would be far below the significance threshold for building and foundational damage. ***Therefore, impacts with regard to building damage from operational vibration would be less than significant.***

***In summary, the proposed Project's construction activities would be below the significance criteria for groundborne vibration impacts with regard to human annoyance and structural damage. Additionally, the proposed Project's operational vibration impacts would be less than significant. Therefore, groundborne vibration impacts would be considered less than significant.***

### (3) Mitigation Measures

Project impacts related to the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels would be less than significant. Therefore, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Project impacts related to the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels would be less than significant without mitigation.

***Threshold (c): For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

As discussed in the Initial Study (provided in Appendix A to this Draft EIR), the proposed Project is not located within a private airstrip, airport land use plan or within two miles of a public airport or public use airport. The nearest public airport to the Project Site is the Burbank Bob Hope Airport, which is located approximately 9 miles to the north/northwest. LAX is located approximately 14 miles southwest of the Project Site. ***As such, the proposed Project would not expose people residing or working in the project area to excessive noise levels and no impact would occur with respect to Threshold (c). Therefore, no further analysis is required.***

## e) Cumulative Impacts

### (1) Impact Analysis

#### *(a) Construction*

This cumulative impact analysis considers development of the proposed Project in combination with ambient growth and other development projects within the vicinity. As noise is a localized phenomenon and decreases in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the proposed Project to result in cumulatively considerable noise impacts.

##### *(i) On-Site Construction Noise and Vibration*

Construction of the proposed Project, in combination with related projects, would result in an increase in construction-related noise and vibration in this already urbanized area of the City. None of the related Project's located within the City of Glendale would generate

in cumulative noise and vibration impacts because they are located over 1 mile away and construction noise and vibration impacts would not be audible in combination with the Project's noise and vibration impacts. All of the related projects within the City of Los Angeles would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. In addition, each of the related projects would be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible.

The closest related projects to the Project Site are Related Projects No. 5, 10, and 15. Related Project No. 5 is the LAUSD Charter School located at 2558 N. San Fernando Road. This related project is completed and operational and, thus, has no potential to generate cumulative construction noise impacts. Related Project No. 15 is the Bow Tie Park and is proposed to undergo soil remediation, habitat restoration and improvements for potential future passive recreational uses. However, the timing and specific development plans for this adjacent property is unknown and, therefore, speculative to address. Related Project 10 is located approximately 700 feet to the east of the Project Site at 2910 W. San Fernando Road. This related project and the proposed Project may have concurrent construction activities, which may impact the Los Feliz Charter School located between these two projects. While the proposed Project's construction noise levels would be less than significant as an isolated project, the combined noise levels from two concurrent project sites within 500 feet of a sensitive receptor would have the potential to increase ambient noise levels by more than 5 dBA. As such, impacts associated with cumulative construction noise would be potentially significant if concurrent construction activities occur. ***The project-related on-site cumulative construction noise impact would, therefore, be considered potentially significant.***

With respect to groundborne vibration human annoyance impacts, the concurrent construction activities with Related Project No. 10 could potentially generate cumulative impacts upon the Los Feliz Charter School for the Arts. As stated above, vibration annoyance impacts experienced by nearby land uses from the proposed Project, including the Los Feliz Charter School for the Arts, would result in a less-than-significant impact. The construction activities would occur during the acceptable time periods for construction activities and would only occur on a temporary and intermittent basis during the construction period. Additionally, Related Project No. 10 would be required to implement several mitigation measures that would serve to reduce groundborne vibration annoyance impacts from the construction site. For example, Related Project 10 would require construction contractors to use equipment that generates lower vibration levels, such as rubber-tired equipment rather than metal-tracked equipment. The noise

mitigation measures for Related Project No. 10 also require the construction contractor to place noise- and vibration-generating construction equipment and locate construction staging areas away from sensitive uses whenever feasible. ***Thus, impacts associated with cumulative groundborne vibration annoyance would be mitigated to a less-than-significant level.***

*(ii) Off-Site Construction Noise and Vibration*

With respect to off-site construction noise and vibration, the concurrent construction activities, especially the number of haul trucks and heavy-duty trucks from the surrounding related projects and the proposed Project can increase noise and vibration along the surrounding roadways and impact the nearby residential neighborhoods. As discussed above, the nearest related project, the Bow Tie Park Project, is still in the design phase and is not anticipated to begin construction until after the proposed Project is constructed; as such, the timing of construction of the proposed Project and the Bow Tie Park Project would not overlap. Related Project No. 10 would most likely utilize the closest freeway, SR-2, via the San Fernando on-ramp to travel to nearby disposal sites. As such, no related project would utilize the same haul route as the proposed Project. ***Therefore, cumulative off-site construction noise and vibration impacts would be less than significant.***

With respect to off-site structural groundborne vibration impacts, the proposed Project's groundborne vibration impacts was determined to be less than significant at the nearest adjacent structure (i.e., the self-storage facility to the north) and the railroad tracks on the Metro Right-of-Way. As discussed above, Related Project No. 10 is the only related project in the vicinity of the Project that could potentiality have construction activities at the same time as the proposed Project. However, unlike noise impacts, the effects of groundborne vibration dissipate rapidly with distance through soil. As such, the groundborne vibration impacts of the proposed Project would not have the potential to combine with groundborne vibration at another construction site that is located over 700 feet away. ***Therefore, cumulative structural groundborne vibration impacts would be considered less than significant.***

*(b) Operation*

*(i) On-Site Operational Noise and Vibration*

The closest related projects to the Project Site, Related Project 10 (located 700 feet to the east of the Project Site at 2910 W. San Fernando Road) and the Bow Tie Park Project (located adjacent to the Project Site at 2780 Casitas Avenue), would have the potential to increase on-site operational noise and vibration. The related projects within the City if

Glendale are located over 1 mile from the Project Site and thus would not have the potential to generate cumulative operational noise impacts from on-site activities.

Each of the related projects in the City of Los Angeles would be subject to the noise provisions in the LAMC, which limit on-site stationary noise sources from exceeding the 5-dBA CNEL increase at the property line. Further, the nearby related projects do not propose any land uses that are associated with higher noise levels, such as industrial uses. Additionally, as discussed above, on-site operational noise impacts for the proposed Project would be less than significant. ***Therefore, based on the distance of the related projects and adherence to the LAMC, cumulative on-site operational noise impacts would be less than significant.***

Groundborne vibration decreases rapidly with distance. The distances of these related projects relative to the Project Site would not combine or overlap in a manner that would cumulatively increase groundborne vibration impacts in the Project vicinity. ***Since the two closest related projects do not involve heavy commercial or industrial land uses, which are typically producers of high groundborne vibration, there would be a less-than-significant impact to cumulative on-site operation vibration impacts.***

*(ii) Off-site Operational Noise and Vibration*

Cumulative roadway noise impacts would occur primarily as a result of increased traffic on local roadways and intersections due to the proposed Project, ambient growth, and related projects within the study area. To assess the cumulative roadway noise impacts, the Future Year With Project (2023) traffic volumes were compared to the Existing (2017) traffic volumes at the 12 study intersections evaluated in the Project Traffic Study presented in greater detail in Section IV.K, Traffic/Transportation. The resulting noise levels for both Existing (2017) and Future Year With Project (2023) conditions are presented in Table IV.G-20, below.

As shown in Table IV.G-20, Future With Project (2023) roadway noise levels would increase less than 3 dBA at all roadway segments analyzed with the exception of two local roadway segments; Larga Avenue and La Clede Avenue. Future cumulative roadway noise levels would increase by a maximum of 5.7 dBA CNEL on Larga Avenue (between Fletcher Drive and Carillon Street) and by 7.2 dBA CNEL on La Clede Avenue (between Fletcher Drive and Carillon Street), which would result in a significant impact. ***Therefore, the cumulative impact associated with off-site operational noise would be significant at these locations.***

With respect to cumulative groundborne vibration impacts, neither the proposed Project nor any of the related projects in close proximity to the Project Site propose any land uses that would generate a substantial increase in groundborne vibration impacts. ***As such,***

***cumulative operational groundborne vibration impacts would be less than significant.***

**Table IV.G-20**
**Cumulative Roadway Traffic Noise Levels**

| | Roadway Segment | Existing (2017) CNEL (dBA) at the Edge of Right-of-Way | Future + Project (2023) CNEL (dBA) at the Edge of Right-of-Way | Significance Criteria CNEL (dBA) | Impact CNEL (dBA) | Significant Impact? |
|---|---|---|---|---|---|---|
| | **Fletcher Drive** | | | | | |
| 1 | Between Ave. 34 and Estara Ave. | 67.2 | 67.7 | 70.2 | 0.5 | No |
| 2 | Between Estara Ave. and San Fernando Rd. | 69.9 | 70.3 | 72.9 | 0.4 | No |
| 3 | Between San Fernando Rd. and La Clede Ave. | 70.4 | 71.0 | 73.4 | 0.6 | No |
| 4 | Between La Clede Ave. and Larga Ave. | 69.3 | 69.7 | 72.3 | 0.4 | No |
| 5 | Between Larga Ave. and SR-2 SB Off Ramp | 69.1 | 69.7 | 72.1 | 0.6 | No |
| 6 | Between SR-2 Off-Ramp and Ripple St. | 72.5 | 72.9 | 75.5 | 0.4 | No |
| 7 | Between Ripple St. and Riverside Dr. | 71.9 | 72.4 | 74.9 | 0.5 | No |
| 8 | Between Riverside Dr. and Glendale Blvd. | 72.0 | 72.4 | 75.0 | 0.4 | No |
| | **Glendale Boulevard** | | | | | |
| 9 | Between Fletcher Dr. and Silver Lake Blvd. | 71.5 | 72.9 | 74.5 | 1.4 | No |
| 10 | Between Lakewood Ave. and Fletcher Dr. | 69.5 | 69.6 | 72.5 | 0.1 | No |
| | **Riverside Drive** | | | | | |
| 11 | Between Glendale Blvd. and Fletcher Dr. | 69.6 | 69.9 | 72.6 | 0.3 | No |
| 12 | Between Fletcher Dr. and Gilroy St. | 69.0 | 69.3 | 72.0 | 0.3 | No |
| | **San Fernando Road** | | | | | |
| 13 | Between Glendale Ave. and Fletcher Dr. | 66.6 | 67.1 | 69.6 | 0.5 | No |
| 14 | Between Fletcher Dr. and SR-2 | 66.9 | 67.5 | 69.9 | 0.6 | No |
| 15 | Between SR-2 and Edward Way | 70.9 | 71.6 | 73.9 | 0.7 | No |
| | **Carillon Street** | | | | | |
| 16 | Between Larga Ave. and Casitas Ave. | 54.4 | 57.8 | 59.4 | 3.4 | No |
| | **Larga Avenue** | | | | | |
| 17 | Between Fletcher Dr. and Carillon St. | 56.7 | 62.4 | 61.7 | 5.7 | Yes |
| | **La Clede Avenue** | | | | | |
| 18 | Between Fletcher Dr. and Carillon St. | 56.9 | 64.1 | 61.9 | 7.2 | Yes |

*Notes:*
*[a] The thresholds of significance is either a 3-dBA CNEL or greater increase over ambient noise levels for land uses that would be impacted to or within the "normally unacceptable" or "clearly unacceptable" range (as identified in Table IV.G-7), or a 5-dBA CNEL or greater increase in all other cases.*

*Source: Parker Environmental Consultants. TNM noise calculation worksheets are provided in Appendix G to the EIR.*

## (2) Mitigation Measures

No feasible mitigation measures have been identified to effectively mitigate the significant cumulative operational roadway noise impacts that are projected to occur. Measures, such as speed humps, curb extensions, and bulbouts, could be employed to slow down

traffic. However, they would be unlikely to divert any traffic. Speed humps would also have the undesirable effect on increasing noise on local streets. As such, these measures would be ineffective in addressing the cumulative roadway noise impacts and are not recommended.

### (3) Level of Significance After Mitigation

Although the Project would have a less-than-significant impact on Sensitive Receptor No. 1, due to the proximity of Related Project No. 10 and the potential for concurrent construction activities, cumulative construction noise impacts would be significant and unavoidable.

With respect to groundborne vibration annoyance impacts, as stated above, due to the shorter attenuation distance for groundborne vibration impacts to occur, the groundborne vibration impacts of the proposed Project and related projects would not combine or overlap in a manner that would cumulatively increase groundborne vibration in the Project vicinity. Cumulative groundborne vibration impacts would be less than significant.

Additionally, noise levels from the on-site operational noise sources would be less than significant. Operational impacts associated with groundborne vibration resulting from the proposed Project would be less than significant. However, future cumulative roadway noise levels would increase by a maximum of 5.7 dBA CNEL on Larga Avenue (between Fletcher Drive and Carillon Street) and by 7.2 dBA CNEL on La Clede Avenue (between Fletcher Drive and Carillon Street), which would result in a cumulative significant and unavoidable impact.

# IV. Environmental Impact Analysis

# H. Population and Housing

## 1. Introduction

This section evaluates the proposed Project in relationship to the Southern California Association of Governments' (SCAG) population and housing growth forecasts for the City of Los Angeles Subregion. It also evaluates whether the proposed Project would cause growth that exceeds projected or planned growth for the City of Los Angeles, Northeast Los Angeles Community Plan Area (CPA). The potential cumulative impacts related to population growth and housing needs in combination with all known related projects are also evaluated.

## 2. Environmental Setting

The Project Site and surrounding area are within the scope of regional population and housing projections provided by SCAG, as well as local projections provided within the City of Los Angeles General Plan Framework Element and the Northeast Los Angeles Community Plan.

### a) Regulatory Framework

#### (1) State

##### *(a) California Government Code Section 65583 and 65584(a)(1) (AB-2158)*

Section 65583 of the California Government Code requires cities and counties to prepare a housing element, as one of seven state-mandated elements of the General Plan, with specific direction on its content. Pursuant to Section 65584(a)(1) the California Department of Housing and Community Development (HCD) reviews every local government's housing element to determine whether it complies with state law. HCD is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's planning body known as a "council of governments" (COG), the Southern California Association of Governments (SCAG) being the COG serving the Southern California area. HCD prepares an initial housing needs assessment and then coordinates with each COG in order to arrive at the final regional housing needs

assessment. To date, there have been four previous housing element update "cycles." California is now in its fifth "housing-element update cycle." The SCAG Regional Housing Needs Assessment (RHNA) and the City's General Plan Housing Element are discussed further below.

*(b) Senate Bill 375 (SB 375, Steinberg) (Chapter 728, Statutes of 2008)*

Senate Bill (SB) 375 (Chapter 728, Statutes of 2008) established mechanisms for the development of regional targets for reducing greenhouse gas emissions from passenger vehicles and light duty trucks. Under SB 375, the regional greenhouse gas (GHG) reduction targets for the passenger vehicle and light-duty trucks guides the regional Metropolitan Planning Organizations in the preparation of growth forecasts for population, households and employment.1 Under SB 375, the reduction target must be incorporated within that region's Regional Transportation Plan (RTP) in a Sustainable Communities Strategy (SCS). As discussed further below, on April 7, 2016, SCAG adopted its 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), which is an update to the previous 2012 RTP/SCS.2 Using growth forecasts and economic trends, the RTP/SCS provides a vision for transportation throughout the region for the next 25 years that achieves the statewide reduction targets; and in so doing identifies the amount and location of growth expected to occur within the region.

## (2) Regional

*(a) Southern California Association of Governments (SCAG)*

SCAG is a federally designated Metropolitan Planning Organization (MPO) representing 6 counties (Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles). SCAG is mandated by federal and State law to research and draw up plans for transportation, growth management, hazardous waste management, and a regional growth forecast that is the foundation for these plans and regional air quality plans developed by the South Coast Air Quality Management District (SCAQMD). SCAG divides its planning area into 15 subregions. The Project Site is located within the City of Los Angeles subregion.

As part of its regional planning efforts, SCAG prepared and adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Regional Housing Needs Assessment (RHNA) to address regional growth and measure progress toward achieving regional planning goals and objectives. Each of these plans is discussed in further detail below.

*(i) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*

In April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016-2040 RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016-2040 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals.

SCAG's population, housing, and employment projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for SCAG's 2012 base year and 2040 planning horizon year are further summarized in Table IV.H-1, below.

**Table IV.H-1**
**SCAG Population and Housing Projections for the City of Los Angeles, Los Angeles County and the SCAG Region**

| **Population** | | | |
|---|---|---|---|
| | **2012** | **2040** | **%Growth (2012-2040)** |
| Los Angeles City | 3,845,500 | 4,609,400 | 20% |
| Los Angeles County | 9,923,000 | 11,514,000 | 16% |
| SCAG Region | 18,322,000 | 22,138,000 | 21% |
| **Households** | | | |
| | **2012** | **2040** | **%Growth (2012-2040)** |
| Los Angeles City | 1,325,500 | 1,690,300 | 28% |
| Los Angeles County | 3,257,000 | 3,946,000 | 21% |
| SCAG Region | 5,885,000 | 7,412,000 | 26% |
| **Employment** | | | |
| | **2012** | **2040** | **%Growth (2012-2040)** |
| Los Angeles City | 1,696,400 | 2,169,100 | 28% |
| Los Angeles County | 4,246,000 | 5,226,000 | 23% |
| SCAG Region | 7,440,000 | 9,872,000 | 33% |

*Source:*
*SCAG, 2016-2040 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.*

*(ii) SCAG's Regional Housing Needs Assessment (RHNA)*

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified

planning periods. The 5th Cycle RHNA Allocation Plan, which covers the planning period from October 2013 to October 2021, was adopted by the Regional Council on October 4, 2012. The State of California Department of Housing and Community Development, Division of Housing Policy Development, approved SCAG's adopted RHNA Plan upon finding it consistent with the 2012-2035 RTP/SCS in that the Final RHNA was developed concurrently with SCAG's development of the Integrated Growth Forecast.

For the City of Los Angeles subregion, the Final RHNA Allocation for the 5th Cycle RHNA Allocation Plan apportioned a total of 82,001 dwelling units, consisting of 10,213 extremely low income households, 10,213 very low income households, 12,435 low income households, 13,728 moderate income households, and 35,412 above moderate income households. The City of Los Angeles RHNA allocation represents one-fifth of the total SCAG RHNA.[1] A summary of the City of Los Angeles Regional Housing Needs Assessment Allocation is presented in Table IV.H-2, below.

Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and household growth. The RHNA does not necessarily encourage or promote growth but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, and addresses social equity and fair share housing needs. The City of Los Angeles does not have a process for allocating the citywide growth among City subareas or Community Plan areas.

**Table IV.H-2**
**City of Los Angeles Regional Housing Needs Assessment Allocation (2014-2021)**

| Income Category | % of Total | Number of Units |
|---|---|---|
| Extremely low income households (≤ 30% AMI [a]) | 12.5 | 10,213 |
| Very low income households (31-50% AMI) | 12.5 | 10,213 |
| Low income households (51-80% AMI) | 15.2 | 12,435 |
| Moderate income households (81-120% AMI) | 16.8 | 13,728 |
| Above moderate income households (≥ 120% AMI) | 43.2 | 35,412 |
| **Total [b]** | **100.1** | **82,001** |

*Notes:*
*[a] AMI = Area Mean Income*
*[b] Percentages add up to more than 100% due to rounding.*
*Sources: SCAG, 5th Cycle RHNA Allocation Plan October 2012 and City of Los Angeles Housing Element of the General Plan (2013-2021), Table 1.29.*

[1] *City of Los Angeles Department of City Planning, City of Los Angeles Housing Element (2013-2021), December 3, 2013, CPC-2013-1318-GPA, at page 1-79.*

### (3) Local

#### *(a) City of Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework (Framework), adopted December 1996 (re-adopted August 2001), provides general guidance on land use issues for the entire City.[2] The Framework contains several housing goals for the City, as identified below.

- An adequate supply of housing accessible to persons of all income levels;
- Sufficient ownership and rental housing to meet the City's needs;
- Housing production incentives for for-profit and non-profit developers of housing for low- and very-low income households;
- A reduction in barriers leading to more housing;
- Housing opportunities accessible to all City residents without discrimination, including groups with special needs;
- A City of residential neighborhoods that maintains a sense of community by conserving and improving existing housing stock;
- Housing, jobs, and services in mutual proximity;
- Energy efficient housing; and
- Goals found in other chapters of the Framework.

The General Plan Framework Element establishes a comprehensive citywide strategy for long-term growth of the City and intended to guide the development of the other elements of the General Plan. The plan is a "smart growth" strategy that generally seeks to accommodate growth near transit and other existing infrastructure to assure a sustainable, economically viable future for Los Angeles. The Framework Element identified a projected population of 4,306,500 million people living in 1,566,000 housing units by 2010.

As a program of the Framework Element, the City Planning Department published the 2015 Report on Growth and Infrastructure which is intended to synthesize detailed information about the City's demographics, development activity, infrastructure and public facilities since the 2010 Census. As noted in the 2015 Report on Growth and Infrastructure, the rate of growth in Los Angeles has slowed significantly since the

[2] *City of Los Angeles, Department of City Planning, The Framework Element of the Los Angeles General Plan, Originally adopted by City Council on December 11, 1996, Re-adopted on August 8, 2001.*

adoption of the Framework Element, with a total population estimate of 4,030,904 persons, 1,453,271 housing units, and 1,818,516 jobs citywide in 2016.[3]

*(b) City of Los Angeles General Plan Housing Element*

The Housing Element is required by California State law to be a component of every city's General Plan because housing needs are recognized as a State-wide concern. Pursuant to State law, the Housing Element must identify the City's housing needs, the sites that can accommodate these needs, and the policies and programs to assure that the housing units necessary to meet these needs can be provided. The primary goal of the Housing Element is to provide a range of housing opportunities for all income groups. Pursuant to California Government Code Section 65580 – 65589.9, the Housing Element is required to be updated every five years in accordance with a specific schedule of dates established by the State.

Adopted in December 2013, the City of Los Angeles General Plan Housing Element covers the period from 2013 to 2021.[4] The Housing Element identifies as its overall goal the creation of a city of livable and sustainable neighborhoods with a range of housing types and costs in mutual proximity to jobs, infrastructure, and services. The City of Los Angeles will achieve this goal amidst a variety of governmental, infrastructure, and market constraints to residential development through aligning its actions in accordance with four detailed goals, each of which contain objectives, policies, and implementing programs. These goals embody the City's commitment to meeting housing needs. The four detailed goals are as follows:

- Goal 1: A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, and affordable to people of all income levels, races, ages, and suitable for their various needs.
- Goal 2: A City in which housing helps to create safe, livable and sustainable neighborhoods.
- Goal 3: A City where there are housing opportunities for all without discrimination.
- Goal 4: A City committed to ending and preventing homelessness.

The City of Los Angeles General Plan Housing Element identifies as its overall goal the creation of a city of livable and sustainable neighborhoods with a range of housing types and costs in mutual proximity to jobs, infrastructure, and services. The Housing Element contains several population and housing objectives for the City, as identified below.

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[3] *City of Los Angeles, Growth and Infrastructure 2015, November 1, 2016.*

[4] *Los Angeles Department of City Planning, Housing Element of the General Plan 2013-2021, adopted December 3, 2013, CPC-2013-1318-GPA.*

- Produce an adequate supply of rental and ownership housing in order to meet current and projected needs;
- Preserve quality rental and ownership housing for households of all income levels and special needs;
- Forecast and plan for changing housing needs over time in relation to production and preservation needs;
- Reduce regulatory and procedural barriers to the production and preservation of housing at all income levels and needs;
- Promote safety and health within neighborhoods;
- Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services, and transit;
- Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources;
- Promote livable neighborhoods with a mix of housing types, quality design and a scale and character that respects unique residential neighborhoods in the City;
- Promote a more equitable distribution of affordable housing opportunities throughout the City;
- Ensure that housing opportunities are accessible to all residents without discrimination on the basis of race, ancestry, sex, national origin, color, religion, sexual orientation, marital status, familial status, age, disability (including HIV/AIDS), and student status.
- Promote fair housing practices and accessibility among residents, community stakeholders and those involved in the production, preservation and operation of housing.
- Provide an adequate supply of short-term and permanent housing and services throughout the City that are appropriate and meet the specific needs of all persons who are homeless or at risk of homelessness.
- Promote outreach and education to homeless populations; residents; community stakeholders; health, social service and housing providers and funders; criminal justice system agencies; and, communities in which facilities and services may be located.[5]

[5] *Los Angeles Department of City Planning, Housing Element of the General Plan 2013-2021, adopted December 3, 2013, CPC-2013-1318-GPA.*

An analysis of the above-listed objectives as they relate to the proposed Project is provided in Section IV.F. Land Use and Planning, of this Draft EIR.

*(c) Northeast Los Angeles Community Plan*

State of California law requires the incorporation of a land use element within cities' general plans. The City of Los Angeles divides its land use element into 35 community plans, which address land use goals, policies, and objectives within each of the 35 CPAs. Each community plan provides population and housing growth estimates for its CPA. The Project Site is located within the Northeast Los Angeles CPA. A detailed description of the Northeast Los Angeles CPA is provided in Section IV.F, Land Use and Planning of this Draft EIR.

Goals of the Community Plan with respect to residential uses include:

- Identifying areas most suitable for multiple-family development based on adequacy of infrastructure; services, especially schools; and employment, as well as neighborhood character;
- Capitalizing on access and proximity to employment as an inducement for residential development; and
- Exploring potential for compatible residential and mixed use development along commercial corridors.

Goals of the Community Plan, with respect to commercial uses include:

- Undertaking planning and zoning actions to minimize conflicts and increase compatibility of commercial areas with nearby residential, industrial, and institutional uses;
- Establishing appropriate transitions between commercial and adjoining uses, especially residential; and
- Creating pedestrian-friendly shopping areas by incorporating street trees, benches, convenient parking/ access, and maintaining retail frontage at ground level.

## (4) Existing Conditions

*(a) Population, Housing and Employment Estimates*

Based on the regional growth projections in the 2016-2040 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons,

approximately 1,325,500 dwelling units, and 1,696,400 jobs in 2012.[6] According to the City Planning Department's population housing and employment estimates presented in the 2015 Growth and Infrastructure Report, the City of Los Angeles had 4,030,904 persons, 1,453,271 housing units and 1,818,516 jobs in 2016. As neither the 2016-2040 RTP/SCS growth forecasts nor the 2015 Growth and Infrastructure Report provide any statistics for 2017, which is the Project's baseline year, or 2023, which is the proposed Project's buildout year, the interim growth projections for these years were based on annualized growth rates for SCAG's 2012 (baseline) and 2040 (planning horizon) projections, and interpolated to obtain an estimate for 2017 and 2023. The population, housing, and employment projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for the proposed Project's baseline year (2017) and the proposed Project's buildout year (2023) are further summarized in Table IV.H-3, below.

**Table IV.H-3**
**Baseline (2017) and Buildout Year (2023) Population and Housing Projections for the City of Los Angeles, Los Angeles County and the SCAG Region**

| **Population** | | | |
|---|---|---|---|
| | **2017** | **2023** | **%Growth (2017-2023)** |
| Los Angeles City | 4,055,008 | 4,199,632 | 3.6% |
| Los Angeles County | 10,207,107 | 10,548,036 | 3.3% |
| SCAG Region | 19,003,429 | 19,821,143 | 4.3% |
| **Households** | | | |
| | **2016** | **2023** | **%Growth (2017-2023)** |
| Los Angeles City | 1,463,147 | 1,522,404 | 4.0% |
| Los Angeles County | 3,380,036 | 3,527,679 | 4.4% |
| SCAG Region | 6,157,679 | 6,484,893 | 5.3% |
| **Employment** | | | |
| | **2016** | **2023** | **%Growth (2017-2023)** |
| Los Angeles City | 1,833,124 | 1,979,200 | 8.0% |
| Los Angeles County | 4,421,000 | 4,631,000 | 4.8% |
| SCAG Region | 7,874,286 | 8,395,429 | 6.6% |

*Source: SCAG, 2016-2040 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016, and City of Los Angeles 2015 Growth and Infrastructure Report, 2016.*
*Parker Environmental Consultants, 2019.*

[6] *Southern California Association of Government, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, Demographics and Growth Forecast Appendix, adopted April 2016.*

*(b) Existing On-Site Conditions*

The Project Site does not contain any housing units and, therefore, does not have any on-site residents. The Project Site is developed with a light manufacturing/ warehouse/production facility (approximately 117,000 square feet) and a surface parking lot. Based on the size of this existing facility, the Project Site is estimated to currently generate approximately 204 employees. (Refer to Table IV.H-4, below).

**Table IV.H-4**
**Estimated Existing Employment on the Project Site**

| Type of Development | Size | Employee Generation Factor [a] | Estimated Employees |
|---|---|---|---|
| Manufacturing Space | 87,000 sf | 1 employee / 535 sf | 163 |
| Warehouse | 25,000 sf | 1 employee / 781 sf | 32 |
| Production Space | 5,000 sf | 1 employee / 535 sf | 9 |
| | | **Total Current Employees** | **204** |

*Notes:*
*sf = square feet*
[a] *Employment rate is based on the generation factor of one employee per 535 sf of manufacturing/production space and one employee per 781 sf of warehousing space. Source: U.S. Green Building Council, Building Area per Employee by Business Type, May 13, 2008.*
*Source: Parker Environmental Consultants, 2018.*

# 3. Environmental Impacts

## a) Thresholds of Significance

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

***Threshold a)*** ***Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

***Threshold b)*** ***Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's L.A. CEQA Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions. The Thresholds Guide identifies the following factors to evaluate population and housing on a case-by-case basis:

*(a) Population and Housing Growth*

- The degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; and
- Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan;
- The extent to which growth would occur without implementation of the project.

*(b) Population and Housing Displacement*

- The total number of residential units to be demolished, converted to market rate, or removed through other means as a result of the proposed project, in terms of net loss of market-rate and affordable units;
- The current and anticipated housing demand and supply of market rate and affordable housing units in the project area;
- The land use and demographics characteristics of the project area and the appropriateness of housing in the area; and
- Whether the project is consistent with adopted City and regional housing policies such as the Framework and Housing Elements, HUD Consolidated Plan and CHAS policies, redevelopment plan, RSO, and the Regional Comprehensive Plan and Guide (RCP&G).

## b) Methodology

This analysis provides an assessment of the population that would be generated by the proposed Project in comparison with regional growth forecasts. The population and housing impacts of the Project are determined based on the estimated number of dwelling units proposed and the number of people who would occupy the Project residential units. The Project's population increase is then compared to population projections for the City of Los Angeles from SCAG's 2016–2040 RTP/SCS. The population growth associated with the proposed Project is then evaluated against the applicable thresholds of significance as identified below.

For purposes of evaluating housing impacts, the proposed Project's housing demand is compared to SCAG's household projections for the City of Los Angeles Subregion. The proposed Project's housing increase is also evaluated against other applicable City and regional housing goals, objectives and policies and other CEQA significance thresholds as identified below.

## c) Project Design Features

No specific Project Design Features are proposed with regard to population and housing.

## d) Analysis of Project Impacts

***Threshold (a): Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

### (1) Construction

The proposed Project is anticipated to generate a number of skilled construction-related jobs during its construction. The work requirements of many construction projects are highly specialized so that construction workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. As a result, construction workers typically work at several job sites within the region throughout the year. Therefore, most construction workers would not be expected to relocate their place of residence as a consequence of working on the proposed Project. ***As such, a substantial number of new permanent residents would not be generated as a result of the construction of the proposed Project, and construction of the proposed Project would not induce population growth in the Project area, either directly or indirectly. Accordingly, population and housing impacts associated with population growth due to temporary construction jobs would be less than significant.***

### (2) Operation

#### *(a) Direct Population Impacts*

The proposed Project includes the demolition of the existing building and structures on the Project Site, and the construction of a mixed-use development comprised of five buildings. The proposed Project would provide a total of 419 multi-family residential units and approximately 64,000 square feet of commercial space. The proposed residential units would include a combination of studio, 1-bedroom, and 2-bedroom units. Thirty-five residential units would be reserved as very low-income units.

As summarized in Table IV.H-5, the proposed Project's 419 dwelling units would generate approximately 1,090 new residents. The estimated population projections were based on

**Table IV.H-5**
**Proposed Project Housing and Population Estimates**

| Land Use | Dwelling Units | Occupancy Rate (persons per unit) [a] | Resident Population |
|---|---|---|---|
| Multi-Family Residential | 419 | 2.6/du | 1,090 |

*Source: Based on American Community Survey (ACS) Public Use Microdata Sample (PUMS) data, the citywide average population for multifamily housing is estimated to be 2.6 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, March 2019).*

an average household size of 2.6 persons per multi-family dwelling unit, which is consistent with the most recent statistical information provided by the U.S. Census Bureau for the City of Los Angeles.[7]

As noted in Table IV.H-3, above, the City of Los Angeles's estimated 2017 population is approximately 4,055,008 people. When considering the estimated growth rate projections calculated from the SCAG's 2016 RTP/SCS, it is estimated that the City's population would increase to 4,199,632 persons in 2023; approximately 144,624 additional persons compared to the estimated population in 2017 (see Table IV.H-3 above). The proposed Project's estimated 1,090 future residents represent approximately 0.75 percent of the total population growth anticipated to occur within the City of Los Angeles between 2017 and 2023. The 1,090 new residents anticipated to be generated by the proposed Project would result in a negligible increase in the City's population growth and is within SCAG's population growth projections for the City of Los Angeles. When added to the projected 2017 population estimate of 4,055,008 persons, the proposed Project's additional 1,090 residents would still be within the total citywide population forecasted for the year 2023. Therefore, the proposed Project's population growth is accounted for in the citywide and regional population projections. ***The proposed Project would result in a less-than-significant impact to population increase in the City during its operation*.**

*(i) Direct Housing Impacts*

There are no existing residences or residential uses on the Project Site. Therefore, the proposed Project would not remove any existing dwelling units or displace any existing

[7] *Based on American Community Survey (ACS) Public Use Microdata Sample (PUMS) data, the citywide average population for multifamily housing is estimated to be 2.6 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, March 2019).*

residents. As noted in Table IV.H-3 above, the City of Los Angeles had a total of approximately 1,463,147 housing units in 2017. When considering the estimated growth projections calculated in SCAG's 2016 RTP/SCS, it is estimated that the City's housing would increase to 1,522,404 households in 2023, resulting in approximately 59,257 additional households compared to the estimated households in 2017 (see Table IV.H-3 above). The proposed Project's 419 dwelling units would represent approximately 0.71 percent of SCAG's citywide housing growth projections during the 2017 to 2023 timeframe. The proposed Project would not exceed the housing growth estimates for 2023. As stated in many adopted regional and local planning documents, including the City's 2013–2021 Housing Element, the City remains in need of new dwelling units to serve both current and projected populations. The proposed Project would help address the City's goals of increasing housing units in a developed, infill location within the City in an area that has the infrastructure to accommodate such growth and diversifying the housing stock by providing affordable housing units. As such, the proposed Project would result in a less-than-significant impact to housing. ***As such, the Proposed Project would not generate substantial demand for new housing, and a less-than-significant impact would occur.***

**Table IV.H-6**
**Estimated Employee Generation**

| Land Use | Quantity Proposed | Employment Generation Rates [a] | Total Employees |
|---|---|---|---|
| **Existing Conditions** | | | |
| Manufacturing Space | 87,000 sf | 1 employee / 535 sf | 163 |
| Warehouse | 25,000 sf | 1 employee / 781 sf | 32 |
| Production Space | 5,000 sf | 1 employee / 535 sf | 9 |
| | | **Total Current Employees** | 204 |
| **Proposed Project (64,000 total commercial)** | | | |
| Restaurant | 3,000 sf | 1 employee / 134 sf | 22 |
| Office | 19,000 sf | 1 employee / 228 sf | 83 |
| Urban Farming | 42,000 sf | -- | 35 [b] |
| | | **Total Proposed Project Employees** | **140** |
| | | *Less Existing Employees* | *-204* |
| | | **NET New Employees** | **-64** |

*Notes:*
[a] *Employment rates based on U.S. Green Building Council, Building Area per Employee by Business Type, May 13, 2008.*
[b] *The Mobility Group, Bow Tie Lofts Project, Draft Traffic Study, December 23, 2016.*
*Source: Parker Environmental Consultants, 2019.*

### *(b) Indirect Population and Housing Impacts*

The proposed Project would generate 140 new jobs. These positions would likely be filled by persons already residing in the vicinity of the workplace and who generally do not relocate their households due to such employment opportunities. As such, the proposed

Project's employment would not indirectly induce population growth or housing impacts. Indirect population and housing growth can also occur from the extension of roads and other infrastructure. The Project Site is located in an urbanized area within the Northeast Los Angeles CPA. The Project Site is located in an infill property and is adequately supported by existing roadways and is already served by existing infrastructure associated with sewer systems, potable water delivery systems, electricity, and natural gas. Additionally, the Project Site is adequately served by public services, including fire, police, schools, parks, and libraries, and would not generate the need for additional services or service provider infrastructure to serve the Project Site. The proposed Project would include an emergency access road but would not involve the construction or extension of any existing public roadways.

With regard to housing, any indirect demand for housing associated with the proposed uses would be fulfilled by a combination of the Project's 419 dwelling units, vacancies in the surrounding housing market, and from other new units in the vicinity of the proposed Project. ***As such, the proposed Project's indirect housing demand would not cause housing growth to exceed projected/planned levels for the Project's buildout year, and the Project's indirect impacts on housing would be less than significant.***

*(c) Consistency with Adopted Plans and Policies*

As discussed above, the proposed Project would be consistent with the population, housing, and employment growth projections of the 2016-2040 RTP/SCS for the City of Los Angeles and the SCAG Region. The 2016-2040 RTP/SCS also encourages compact growth in areas accessible to transit and jobs and housing closer to transit. The variety of mixed uses proposed by the Project allows for future residents to live and work on-site. The proposed Project further promotes the connectivity of the Project Site to the surrounding neighborhood area by providing pedestrian and bicycle access from the Los Angeles River. The proposed Project would also provide on-site bicycle storage areas for Project residents and guests to facilitate and encourage alternative modes of transit. The proposed Project would be consistent with the growth strategies, goals, and policies of the 2016-2040 RTP/SCS. (Refer to Section IV.F, Land use and Planning of this Draft EIR, for a more detailed consistency analysis with the 2016-2040 RTP/SCS.)

The increased housing stock generated by the proposed Project would help the City of Los Angeles address the housing crisis identified by the General Plan Housing Element and the City's Regional Housing Needs Assessment Allocation. The proposed Project would provide 419 dwelling units, which includes 35 dwelling units reserved as Very Low Income" units. The dwelling units would be available to all persons without discrimination. This would be consistent with the General Plan's Framework Element and Goal 1 of the General Plan's Housing Element, which promotes the adequate supply of safe, healthy,

and affordable housing to people of all income levels, races, ages, and suitable for their various needs. Additionally, the proposed Project would revitalize and activate an underutilized site that is currently improved with light manufacturing, warehouse, and film production space with new business and employment opportunities with neighborhood-serving restaurants, office space, and an urban farm, which would foster competitiveness of the commercial area, which is encouraged by the Framework Element. The proposed Project would also be consistent with the City's Community Plan goal of providing a more equitable distribution of affordable housing opportunities throughout the City. Further, the proposed Project's dwelling units would include a mix of studio, one-bedroom, and two-bedroom units. This unit mix would diversify the City of Los Angeles' housing stock and increase housing opportunities in the CPA and within the City. Furthermore, the proposed Project would be consistent with the Community Plan's objective to allocate land for new housing to accommodate a growth of population and promotes the health, safety, welfare, convenience, and pleasant environment of those who live and work in the community. The proposed Project's mixed uses are encouraged by the Northeast Los Angeles Community Plan. (Refer to Section IV.F, Land use and Planning of this Draft EIR, for a more detailed consistency analysis with the Northeast Los Angeles Community Plan.)

***As such, the proposed Project would be consistent with the applicable growth projections of the 2016-2040 RTP/SCS and with the goals and policies of the General Plan's Housing Element, Framework Element, Northeast Los Angeles Community Plan, and 2016-2040 RTP/SCS. Therefore, a less-than-significant impact would occur with respect to substantial population growth.***

#### (3) Mitigation Measures

Project impacts related to population and housing would be less than significant. Therefore, no mitigation measures would be required.

#### (4) Level of Significance After Mitigation

Project impacts related to population and housing would be less than significant without mitigation.

***Threshold (b): Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study (Appendix A to this Draft EIR), the proposed Project would include the demolition of the existing light industrial building and would not displace any people or housing units that would necessitate the construction of replacement housing elsewhere. ***Therefore, the***

***proposed Project would have no impact with respect to Threshold (b), and no further analysis is required.***

## e) Cumulative Impacts

### (1) Construction

The construction of the proposed Project and 17 related projects are anticipated to generate a number of skilled construction-related jobs during the construction phases. The work requirements of many construction projects are highly specialized so that construction workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. As a result, construction workers typically work at several job sites within the region throughout the year and rotate from job site to job site. Therefore, most construction workers would not be expected to relocate their place of residence as a consequence of working on the proposed Project and related projects. ***As such, a substantial number of new permanent residents would not be generated as a result of the construction of the proposed Project and related projects, and cumulative impacts associated with population growth due to temporary construction jobs would be less than significant.***

### (2) Operation

#### *(a) Population and Housing Growths*

Of the 17 related projects identified in Section III, Environmental Setting, seven related projects within the study area would introduce additional housing developments that would have the potential to generate additional population growth within the cities of Los Angeles and Glendale. The seven related projects would propose 632 condominiums and 514 apartments units for a total of 1,146 total dwelling units proposed within the City of Los Angeles and the City of Glendale, which would increase the total number of dwelling units and population to the SCAG Region. As shown in Table IV.H-7, below, the proposed Project and related projects within the SCAG Region would generate a combined 1,565 residential dwelling units and a resident population of approximately 4,071 persons. Based on this estimate, the proposed Project's cumulative contribution to the housing and population growth would be within the growth projections of the SCAG region as a whole. ***Therefore, the proposed Project's contribution to a cumulative housing and population impact would be less than significant.***

**Table IV.H-7**
**Estimated Cumulative Residents and Housing Growth**

| Use | Total Housing Units | Total Residents |
|---|---|---|
| Apartments | 514 | 1,337 |
| Condominiums | 632 | 1,644 |
| ***Total Related Projects:*** | ***1,146*** | ***2,981*** |
| Proposed Project: | 419 | 1,090 |
| **NET Total Growth:** | **1,565** | **4,071** |

*Source: Based on American Community Survey (ACS) Public Use Microdata Sample (PUMS) data, the citywide average population for multifamily housing is estimated to be 2.6 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, March 2019).*

### (3) Mitigation Measures

Cumulative impacts related to population and housing would be less than significant. Therefore, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Cumulative impacts related to population and housing would be less than significant without mitigation.

# IV. Environmental Impact Analysis

# I. Public Services

## 1. Fire Protection

## 1. Introduction

The following section analyzes the proposed Project's impacts upon fire protection services. Fire protection services in the Project area are provided by the City of Los Angeles Fire Department (LAFD). This section is based, in part, on the LAFD's existing resources and capabilities to serve the Project area and addresses the adequacy of emergency response, and the ability of the Project to meet the Los Angeles Municipal Code required fire-flow standards and hydrant requirements. Additionally, LAFD's correspondence letter for the proposed Project (dated November 6, 2017) is provided as Appendix I to this Draft EIR.

## 2. Environmental Setting

Fire prevention, fire suppression, and life safety services are provided throughout the City of Los Angeles by the LAFD, as governed by the City's General Plan Safety Element and the Fire Code section of the Los Angeles Municipal Code (LAMC). The Safety Element and the Fire Code serve as guides to City Departments, government offices, developers, and the public for the construction, maintenance, and operation of fire protection facilities located within the City of Los Angeles. Policies and programs addressed in the documents include: fire station distribution and location, required fire flow (i.e. water supply), fire hydrant standards and locations, access provisions, and emergency ambulance service.

### a) Regulatory Framework

#### (1) State

##### *(a) Occupational Safety and Health Administration*

The California Department of Industrial Relations, Division of Occupational Safety and Health (Ca-OSHA) provides details on fire protection and prevention for construction safety. Employers are responsible for a fire protection program during the construction

phase. Additionally, OSHA requires employers to implement fire protection and prevention programs in the workplace [29 CFR 1910.38].

*(b) 2016 California Fire Code*

The California Fire Code (CFC) contains regulations consistent with national recognized and accepted practices for safeguarding life and property from the hazards of: fire and explosion, dangerous conditions arising from the storage, handling, and use of hazardous materials and devices, and hazardous conditions in the use or occupancy of buildings or premises. The CFC also contains provisions to assist emergency response personnel. The 2016 CFC became effective January 1, 2017.

*(c) California Constitution Article XIII, Section 35*

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be used exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection, as well as other public safety services. In City of Hayward v. Board of Trustee of California State University (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that a lead agency will comply with that provision and ensure that public safety services are provided.

## (2) Local

*(a) City of Los Angeles General Plan Safety Element*

The Los Angeles General Plan Safety Element (Safety Element) was adopted by the Los Angeles City Council on November 26, 1996. The Safety Element replaces three previously adopted elements of the City's General Plan: the 1975 Safety Element, the 1974 Seismic Safety Element, and the 1979 Fire Protection and Prevention Element. All three elements have been revised and combined in the current Safety Element. The Safety Element generally does not contain specific standards, because City code and

regulations contain standards for water, street, development, etc. Most of the Safety Element's goals, objectives, and policies are directed towards the City. City goals for fire safety include:

Goal 1 A city where potential injury, loss of life, property damage and disruption of the social and economic life of the City due to fire, water related hazard, seismic event, geologic conditions or release of hazardous materials disasters is minimized.

Goal 2 A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.

Policy 2.1.6 of the Safety Element addresses standards for fire facilities. Policy 2.1.6 states:

**Policy 2.1.6** Standard/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. [All peak load water and other standards, code requirements (including minimum road widths, access, and clearances around structures) and other requirements or procedures related to fire suppression implement this policy.]…

Specific standards for fire prevention and response are listed in the Safety Element and are further incorporated and addressed in the Fire Code (discussed below).

*(b) Los Angeles Fire Code*

The Los Angeles Fire Code (Fire Code) is a component of the overall Los Angeles Municipal Code and is a combination of the California Fire Code and the Los Angeles amendments, which are sections to the California Fire Code that were adopted and changed. The Fire Code, as it pertains to the Project, specifies standards for development to ensure that adequate fire service features, such as response distance, emergency access, and fire flow, are maintained. The City of Los Angeles Fire Code specifies the maximum response distance allowed between specific sites and engine and truck companies, based upon land use and fire flow requirements. Table IV.I-1 provides the maximum response distance for fire stations based on a project's proposed land use. When response distances exceed these requirements, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g. fire signaling systems, fire extinguishers, smoke removal

systems, etc.). Automatic fire sprinkler systems are also required for all high-rise structures within the City that exceed 75 feet in height.

**Table IV.I-1**
**Maximum Response Distance**

| Land Use | Maximum Response Distance (miles) | |
|---|---|---|
| | Engine Company | Truck Company |
| Low Density Residential | 1.5 | 2 |
| High Density Residential and Commercial Neighborhood | 1.5 | 2 |
| Industrial and Commercial | 1 | 1.5 |
| High Density Industrial and Commercial or Industrial (Principal Business Districts or Centers) | 0.75 | 1 |
| *Source: City of Los Angeles, 2017 City of Los Angeles Fire Code, Chapter 5, Table 507.3.3.* | | |

*(i) Fire Flow*

City-established fire flow requirements set forth in the Fire Code (*LAMC Section 57.507.3.1, Table 57.507.3.1*) vary from 2,000 gallons per minute (gpm) from three adjacent hydrants flowing simultaneously for low-density residential areas to 12,000 gpm available to any block in high-density commercial and industrial areas. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing. Refer to Table IV.I-2, Fire Flow by Type of Land Development, below.

**Table IV.I-2**
**Fire Flow by Type of Land Development**

| Type of Land Development | Fire Flow in Gallons per Minute (GPM) |
|---|---|
| Low Density Residential | 2,000 from three adjacent fire hydrant flowing simultaneously |
| High Density Residential and Commercial Neighborhood | 4,000 from four adjacent fire hydrants flowing simultaneously |
| Industrial and Commercial | 6,000 to 9,000 from four to six fire hydrants flowing simultaneously |
| High Density Industrial and Commercial or Industrial (Principal Business Districts or Centers) | 12,000 available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 GPM will be required.) |
| *Source: City of Los Angeles, 2017 City of Los Angeles Fire Code, Chapter 5, Table 507.3.1.* | |

The Fire Code also establishes requirements for fire hydrant types and spacing by land use type. Required distances between hydrants on roads and fire lanes range from 300 feet for high-density residential, commercial, and industrial uses and neighborhood commercial uses to 600 feet for low-density residential uses. Required types of fire hydrants include 2 ½ -inch by 4-inch double hydrants and 4-inch by 4-inch double hydrants.

## b) Existing Conditions

Fire protection adequacy for a given area is based on required response distance, fire flow from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal, App. 4th 833, 847 ruling, the City is meeting its constitutional obligation to provide adequate public safety services, including fire protection and emergency medical services.

Citywide, the LAFD has 3,246 uniformed personnel and 353 non-uniformed support staff. Their services include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education and community service. A total of professionally trained staff of 1,018 firefighters (including 270 serving as firefighter/paramedic-trained personnel) is on duty at all times at 106 neighborhood fire stations located across the LAFD's 471 square-mile jurisdiction.[1]

### (1) Emergency Access

As described in Section II, Project Description, of this Draft EIR, the Project Site is developed with a light manufacturing facility (approximately 117,000 square feet) and a surface parking lot. Vehicular access to the Project Site is provided by a full-access driveway off of Casitas Avenue, which allows ingress and egress access to and from the surface parking lot on-site.

Roadway congestion, intersection level of service, weather conditions, and construction traffic along a response route can affect emergency response. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with LADOT, has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along

[1] *Los Angeles Fire Department, website: http://www.lafd.org/about/about-lafd/our-mission, accessed August 2018.*

designated City streets.[2] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[3]

### (2) Fire Flow

The required fire flow is closely related to the type and size of the land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Based on the current industrial land uses on the Project Site, the existing fire-flow can vary from 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously for an industrial development.[4] The proposed Project is requesting a zone change from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO to allow the mixed-use residential and commercial development. Fire flow requirements vary from 2,000 gpm in low density residential areas to 12,000 gpm in high-density commercial or industrial areas. Based on correspondence with the LAFD, the required fire flow for the proposed Project is set at 12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm would be required).[5]

Water to maintain adequate fire flows for the area surrounding the Project Site is provided by the City of Los Angeles Department of Water and Power (LADWP). All water mains and lines are designed and sized according to LADWP standards and take into account fire flow and pressure requirements. The nearest fire hydrant is located at the adjacent storage property, near the Project Site's northern property line.[6] Section IV.J.1, Water Supply, provides a complete discussion of water service infrastructure in the Project area.

### (3) Fire Protection Facilities and Services

Fire protection and paramedic services are provided to the Project Site and its vicinity by the LAFD. The Project Site is located within Battalion 2 within the Central Bureau. Fire Station 50, located at 3036 Fletcher Drive, approximately 0.6 mile from the Project Site, provides primary fire protection and paramedic services to the Project Site. LAFD Station No. 50 is equipped with a task force truck and engine company. The Project Site is also served by Fire Station No. 56, No. 44, No. 55, and No. 42. Table IV.I-3, below, lists the

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2 *LADOT, Los Angeles Signal Synchronization Fact Sheet, accessed August 2018.*

3 *LAFD, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulleting No. 133, October 2008.*

4 *LAMC Section 57.507.3.1, Fire Flow Requirements, Table 57.507.3.1, Fire Flow by Type of Land Use Development.*

5 *See Inter-Departmental Correspondence from the LAFD to the City Planning Department, Case No. EIR-2016-2862-EIR (Corrected Letter), dated November 6, 2017 in Appendix I, Public Service Letters.*

6 *City of Los Angeles, Navigate LA, http://navigatela.lacity.org/navigatela/, accessed August 2018.*

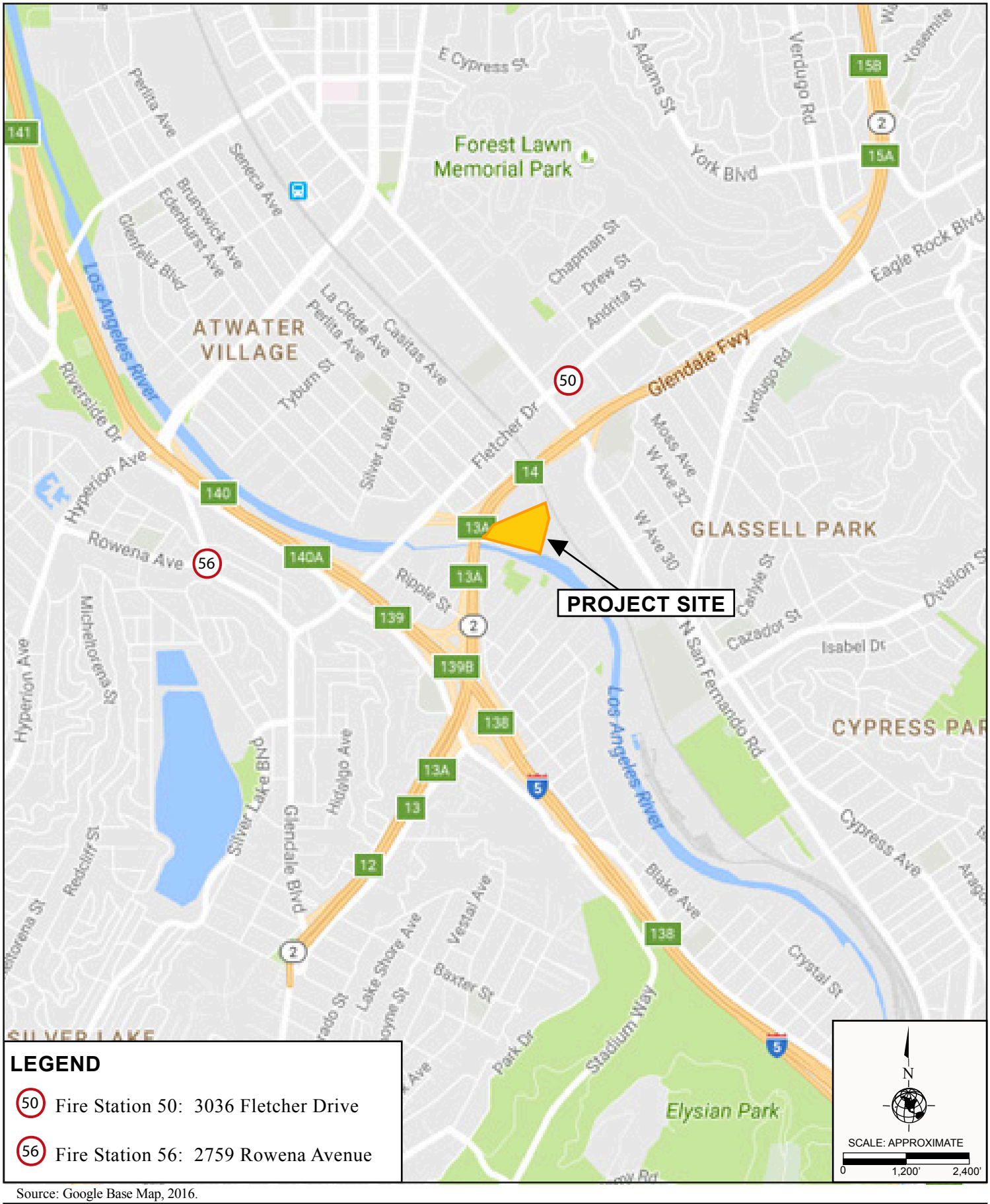
location, equipment, and personnel of each aforementioned station. Based on the response distance criteria specified in LAMC 57.507.3.3 and the relative response distances to the two closest LAFD Stations (Station no. 50 and No. 56) from the Project Site, fire protection response is currently considered adequate.[7] Figure IV.I-1, Fire Station Location Map, shows the location of each fire station in relation to the Project Site.

**Table IV.3**
**Fire Protection Services Serving the Project Site**

| Fire Station | Equipment and Personnel | Staff | Distance (miles) |
|---|---|---|---|
| **Fire Station No. 50**<br>3036 Fletcher Drive<br>Los Angeles, CA 90065 | Task Force Truck and Engine Company | 10 | 0.6 |
| **Fire Station No. 56**<br>2759 Rowena Avenue<br>Los Angeles, CA 90039 | Single Engine Company | 4 | 1.4 |
| **Fire Station No. 44**<br>1410 Cypress Avenue<br>Los Angeles, CA 90065 | Single Engine Company | 4 | 2.1 |
| **Fire Station No. 55**<br>4455 E. York Boulevard<br>Los Angeles, CA 90041 | Single Engine Company, Paramedic Rescue Ambulance, Battalion 2 Headquarters | 7 | 2.4 |
| **Fire Station No. 42**<br>2021 Colorado Boulevard<br>Los Angeles, CA 90041 | Single Engine Company | 4 | 3.8 |

*Source: Los Angeles Fire Department Correspondence Letter, Notice of Preparation Environmental Impact Report and Public Scoping Meeting, 2750-2800 W. Casitas Avenue, Los Angeles, CA 90039, November 6, 2017.*

[7] *See Inter-Departmental Correspondence from the LAFD to the City Planning Department, Case No. EIR-2016-2862-EIR (Corrected Letter), dated November 6, 2017 in Appendix I, Public Service Letters.*




Source: Google Base Map, 2016.

Figure IV.I-1
Fire Station Location Map

### (4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.[8] Therefore, the Project Site is not located within a fire hazard area.

# 3. Environmental Impacts

## a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, a significant impact to fire protection would occur if a project would:

***Threshold a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide (Thresholds Guide) identifies the following criteria to evaluate fire protection services: (a) The Project requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

## b) Methodology

Fire protection and emergency medical service needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of the proposed Project and surrounding community. Changes in one or more of these factors may increase the demand for services or the ability for the LAFD to provide an adequate level of service. The LAFD evaluates the demand for fire prevention and protection services on a project-by-project basis, including review of the Project's emergency features, to determine if the Project would require additional equipment, personnel, new facilities, or alterations to existing facilities.

[8] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report., http://zimas.lacity.org/, accessed October 25, 2017.*

The need for or deficiency in adequate fire protection and emergency medical services in and of itself is not a CEQA impact, but a social or economic impact.[9] Where a project causes a need for additional fire protection and emergency medical services resulting in the need to construct new facilities or additions to existing facilities and construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact related to fire protection and emergency medical services will result from the construction of new or expanded fire protection and emergency medical facilities. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

## c) Project Design Features

The proposed Project would comply with all applicable LAMC fire safety requirements, including City fire flow requirements contained in LAMC Section 57.507.3.1, the Building Code (Chapter 9), and the Fire Code (Chapter 7). No specific project design features are proposed with regard to fire protection services.

## d) Analysis of Project Impacts

***Threshold a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service rations, response times or other performance objectives for fire protection services?***

### (1) Project Impacts

#### *(a) Construction*

The proposed Project has the potential to increase demands on the LAFD during the construction period. Removal of the existing structures and construction of the proposed Project would increase the potential for personal injury and fires from the operation of mechanical equipment, the use and storage of flammable fuel and construction materials, and other dangers that are inherent to the construction industry. In most cases, the

[9] *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal, App. 4th 833, 847

implementation of “good housekeeping” procedures and compliance with mandatory OSHA regulations by the construction contractors and the work crews would minimize these hazards. Good housekeeping procedures that would be implemented during demolition and construction of the proposed Project include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. However, while impacts to fire protection services would be potentially adverse, they are considered to be less than significant as construction impacts are temporary in nature and do not cause lasting effects. The Project Site is currently located at the terminus of Casitas Avenue and is generally isolated from the surrounding circulation system. The Bowtie Project, which is a collaboration of artwork and performances, borders the Project Site to the east and is currently a vacant parcel but planned for passive public park use in the future. A public facilities road branches off of Casitas Avenue and continues eastward through this area from the Project Site area. As discussed in Section IV.K, Traffic/Transportation, the Applicant would be required to develop a Construction Traffic Control/Management Plan prior to construction to minimize the effects of construction on vehicular and pedestrian circulation. The Plan would be required to be submitted to LADOT for review and approval prior to the commencement of the construction period. The Plan shall include temporary roadway striping and signage for traffic flow as necessary, as well as the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project Site.

Furthermore, throughout the construction process, the proposed Project would be required to maintain appropriate fire flow and access pursuant to the Los Angeles Fire Code, LAMC Sections 57.503 and 57.507.3. Project construction would not be expected to tax firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD, the construction of which could cause significant environmental impacts. ***Therefore, construction-related impacts to fire protection services would be less than significant.***

*(b) Operational Impacts*

The proposed Project would include up to 419 dwelling units and 64,000 square feet of commercial space that would generate up to 1,090 new residents and approximately 140

employees.[10,11] Thus, the proposed Project is expected to increase the number of persons on the Project Site, which would potentially increase the demand for LAFD services. The following discussion analyzes the major criteria for determining the impacts of the proposed Project to fire protection services, including response distance, emergency access/evacuation and fire flow.

*(c) Fire Protection Facilities and Services and Response Distance*

As presented in Table IV.I-1, the maximum response distance between residential land uses and a LAFD fire station that houses an Engine or Truck Company is 1.5 miles. As discussed above, the existing distances from the fire stations serving the Project Site are as follows: Fire Station 50 is located 0.6 mile from the Project Site and Fire Station 56 is located 1.5 miles from the Project Site. Fire Station No. 50 is equipped with a task force truck and engine company. As such, the response distances from the Project Site to the fire stations meet the desired response distances (LAMC Section 57.507.3) and performance standards regarding emergency response.[12] Although the Project Site's distance is considered adequate, fire sprinkler systems would be installed and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems etc.) per the City of Los Angeles Fire Code.

The LAFD would be involved as part of the plan check process and would provide all necessary conditions of approval for the proposed Project. Based on the response distance criteria specified in LAMC 57.507.3.3 and the relatively short distance from the Project Site to two well-equipped fire stations, fire protection response would be considered adequate with respect to response distances. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. In addition, in accordance with the *City of Hayward v. Board Trustees of California State* University (2015) 242 Cal.App.4th 833 ruling, the California Constitution Article XIII, Section 35(a)(2) and the fire protection-related goals, objectives, and polices set forth in the General Plan Safety Element, and as confirmed in the written correspondence from the LAFD, the City along with LAFD would continue to monitor the

[10] *Based on American Community Survey (ACS) Public Use Microdata Sample (PUMS) data, the citywide average population for multifamily housing is estimated to be 2.6 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, March 2019).*

[11] *Based on the assumption of 1 employee per 134 square feet of restaurant space, 1 employee per 228 square feet of office space, and 35 employees for the urban farm. Source: U.S. Green Building Council, Building Area per Employee by Business Type Table, May 13, 2008.*

[12] *Los Angeles Fire Department Correspondence Letter, Notice of Preparation Environmental Impact Report and Public Scoping Meeting, 2750-2800 W. Casitas Avenue, Los Angeles, CA 90039, November 6, 2017*

demand for existing and projected fire facilities, and coordinate the development of new fire facilities to be phased with growth. ***Thus, the proposed Project operational impacts to response distance and fire protection facilities and services would be less than significant.***

*(d) Emergency Access*

The proposed Project would not involve activities during its operational phase that could impede public access or travel upon public right-of-way or would interfere with an adopted emergency response or evacuation plan. Emergency vehicle access to the Project Site would continue to be provided from Casitas Avenue. A designated fire lane would traverse the middle of the Project Site connecting from the northeast corner to the southwest corner of the Project Site and would also run along the southern and eastern property lines of the Project Site (See Figure II-4, Proposed Plot Plan in Section II, Project Description).

Additionally, as discussed in Section II, Project Description, the Applicant is seeking to obtain a secondary emergency access point to access the Project Site from a point other than the main driveway on Casitas Avenue. It is anticipated that the proposed Project would be conditioned on acquiring and maintaining an emergency access route from one of the following three options:

- Option 1: An emergency access gate from the west side of the Project Site connecting to the existing service road on the east bank of the Los Angeles River Channel accessible via Fletcher Drive. This option would require obtaining permission from the LADWP;

- Option 2: An emergency access gate and driveway from the northbound onramp of SR-2, immediately north of and adjacent to the Project Site. This option would require approval from Caltrans; and

- Option 3: An emergency access gate on the south side of Casitas Avenue providing access through the future Bow Tie Park. This option would necessitate improving and paving an approximate 1.2-mile access road through a currently vacant site (which is planned for future parkland) and would require obtaining the permission of the State Parks Department.

Each of the three options described above are identified and delineated in Figure II-17 Secondary Emergency Access Options in Section II, Project Description. The acquisition and maintenance of a secondary emergency access point would provide additional and improved emergency access to the site and would facilitate a better response from the LAFD in the event of an emergency.

As discussed in Section IV.K, Transportation/Traffic, the proposed Project would result in a less-than-significant impact with respect to traffic, emergency access, and design hazards that currently serve the Project area. The proposed Project's site plan would be reviewed and approved by the LAFD and the Department of Building and Safety as part of the plan check approval process. ***The proposed Project's emergency access impact would be less than significant.***

*(e) Fire Flow*

As determined by the LAFD Correspondence Letter, dated November 6, 2017 (Appendix I of this Draft EIR), the overall fire flow requirement for a high density residential and neighborhood commercial type development, such as the proposed Project, is 12,000 g.p.m. available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 g.p.m. will be required) and a 20 psi minimum residual pressure. The required fire flow for the proposed Project would be confirmed in consultation with the LAFD during the plan check approval process and is subject to change from the required fire flow in the LAMC. As discussed in the LAFD Correspondence Letter, improvements to the water system may be required for this project to provide 12,000 and 2,000 to 8,000 gpm fire flow. The cost of improving the water system may be charged to the Applicant. For more detailed information regarding water main improvements, the Applicant would contact the Water Services Section of the LADWP.

The Water Operations Division of the LADWP would perform a fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. Hydrants, water lines, and water tanks may be installed per Fire Code requirements and would be based upon the specific land uses of the proposed Project. The points of connection would be verified at the time of connection to ensure adequate water supply and pressure existing in the proposed connection lines. The Project Applicant would be required to ensure adequate fire flows and infrastructure pursuant to the City of Los Angeles Fire Code. ***Therefore, with respect to fire flows, fire protection would be adequate, and the proposed Project's impact upon fire protection services would be less than significant.***

***Based on the analysis above, the proposed Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain service and would not inhibit LAFD emergency response. Therefore, impacts to fire protection and EMS during proposed Project operation would be less than significant.***

### (2) Mitigation Measures

Project impacts with regard to fire protection services would be less than significant. Thus, no mitigation measures would be necessary.

### (3) Level of Significance After Mitigation

Project impacts to fire protection services would be less than significant without mitigation.

## e) Cumulative Impacts

### (1) Impact Analysis

The proposed Project, in combination with the construction and operation of the 12 related projects (See Section III, Environmental Setting), is expected to increase the demand for fire protection services in the Project area. Specifically, there would be increased demand for additional staffing, equipment, and fire protection facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the proposed Project and related projects would contribute.

Each related project would be required to satisfy the response distance, emergency access, and fire flow requirements pursuant to their respective fire codes (City of Los Angeles or City of Glendale). Within the City of Los Angeles, if the response distance is exceeded, each related project within the City of Los Angeles would be subject to LAMC Section 57.503.3.3, which requires the installation of automatic fire sprinkler systems. Similar to the proposed Project, each of the related projects would be individually subject to review by their respective enforcement and monitoring agency (i.e., the LAFD for projects within the City of Los Angeles and the Glendale Fire Department for projects within the City of Glendale), and would be required to comply with all applicable construction-related and operational fire safety requirements in their respective jurisdiction (City of Los Angeles or City of Glendale) in order to adequately mitigate fire protection impacts. With respect to emergency access, the design of each related project would be evaluated individually in coordination with their respective jurisdictional agencies to minimize any potential impacts.

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board Trustees of California State* University (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new

station construction would be identified and allocated according to the priorities at the time. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on fire protection and emergency medical services would be less than significant.

***On this basis, the proposed Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on fire protection services would be less than significant.***

### (2) Mitigation Measures

Cumulative impacts with regard to fire protection services would be less than significant. Thus, no mitigation measures would be necessary.

### (3) Level of Significance After Mitigation

Cumulative impacts to fire protection services would be less than significant without mitigation.

# V. IV. Environmental Impact Analysis

# I. Public Services

## 2. Police Protection

## 1. Introduction

The following section analyzes the proposed Project's impacts upon police protection services. Police protection services in the Project area are provided by the City of Los Angeles Police Department (LAPD). The information below is based, in part, on the crime reporting statistics as published by the LAPD and the proposed Project's ability to deter crime through proper site planning and design features to ensure adequate public safety on and immediately adjacent to the Project Site.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) State

##### (a) *California Constitution Article XIII, Section 35*

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be used exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police

protection services, and that it is reasonable to conclude that a lead agency will comply with that provision and ensure that public safety services are provided.[13]

### (2) Local

#### *(a) City of Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework Element (General Plan Framework), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision for long-term growth within the City and guides subsequent amendments of the City's Community Plans Specific Plans, zoning ordinances, and other local planning programs.[14]

Chapter 9 of the General Plan Framework addresses Infrastructure and Public Services. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, state law enforcement agencies, and the National Guard.

#### *(b) Northeast Los Angeles Community Plan*

The Northeast Los Angeles Community Plan contains the following police protection objectives, policies and programs applicable to the Project Site:

**Objective 8-1:** To provide adequate police facilities and personnel to correspond with population and service demands.

**Policy 8-1.1:** Coordinate with Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

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[13] *City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.*

[14] *City of Los Angeles Department of City Planning, The Citywide General Plan Framework Element, originally adopted in 1995, re-adopted in 2001, http://cityplanning.lacity.org/cwd/framwk/chapters/title.htm. accessed September 9, 2017.*

*(c) The City of Los Angeles Charter and Administrative and Municipal Codes*

The City Charter, Administrative Code, and Los Angeles Municipal Code (LAMC) identified law enforcement regulations and the powers and duties of the LAPD. City Charter Article V, Section 570 gives the power and the duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and state and federal laws. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity.

Section 22.240 of the Administrative Code requires the LAPD to adhere to the state standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter 5 regulations related to fire arms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors and the LAFD in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is given the power and the duty to protect residents and property, and to review and enforce specific security related mitigation measures in regards to new development.

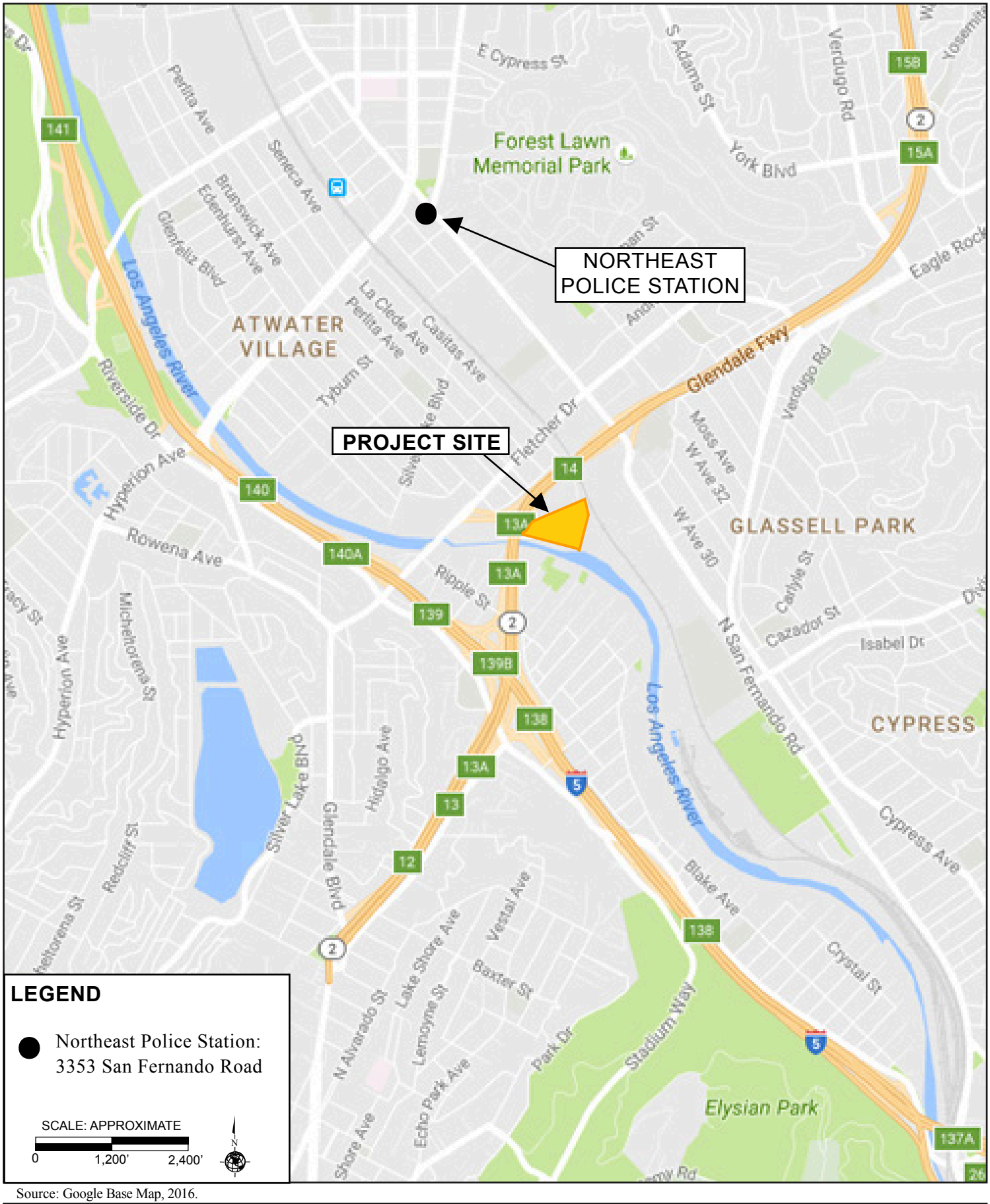
## b) Existing Conditions

### (1) LAPD Service Area and Bureaus

The LAPD service area covers approximately 473 square miles and is divided into four geographic bureaus: Central Bureau, West Bureau, South Bureau, and Valley Bureau.[15] The LAPD is the local law enforcement agency responsible for providing police protection services to the Project Site and immediate Project vicinity. The Project Site is located within the service area of LAPD's Central Bureau, which oversees operations in five communities and includes the Northeast Los Angeles area. Under the jurisdiction of the Central Bureau, the Northeast Community Police Station serves the Project Site. The Northeast Community consists of Atwater Village, Cypress Park, Eagle Rock, East Hollywood, Echo Park, Elysian Park, Elysian Valley, Franklin Hills, Garvanza, Glassell Park, Highland Park, Los Feliz, Mount Washington, Silver Lake, and Solano Canyon.[16] A location map depicting the Project Site in relation to the Northeast Community Police Station is presented in Figure IV.I-2, Police Station Location Map.

[15] *LAPD, COMPSTAT Plus, http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed August 4, 2017.*

[16] *Los Angeles Police Department, Northeast Community Police Station, website: http://www.lapdonline.org/northeast_community_police_station, accessed September 2016.*




Source: Google Base Map, 2016.

Figure IV.I-2
Police Station Location Map

### (2) LAPD Community Police Station

The Northeast Community Police Station is located at 3353 San Fernando Road, approximately 0.9 mile north of the Project Site. Correspondence with the LAPD, Community Relationship Division, indicates that the Northeast Community Police Station is approximately five minutes from the Project Site without traffic. The Northeast geographic area is approximately 29 square miles and consists of approximately 295 sworn personnel and 16 civilian support staff. The Northeast geographic area is a culturally diverse community with a population of approximately 250,000 persons. The officer to resident ratio is 1 officer to 847 residents in the Northeast Area. Additionally, there are special service teams available within the LAPD to serve the Northeast Area. Special services include an emergency response system at the Northeast Station, which is directly linked to the LAPD Communications Division's Dispatch Centers. The Communications Division has the responsibility to staff and answer, on a 24-hour bases, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, and paramedic).[17]

### (3) LAPD Crime Statistics

The LAPD posts year-to-date crime statistics, which are reported and organized by each police station. Table IV.I-4, Northeast Area Crime and Arrest Statistics, provides crime statistics for the Northeast Area and compares the crime statistics for years of 2015 through 2017. As shown in Table IV.I-4 a total of 6,044 crimes and 3,169 arrests were reported in the Northeast area for 2017, or 0.02 crime per capita, with the predominate number of crimes being burglary/theft from vehicle and other types of theft. Table IV.I-5, provides a comparison of the total crimes in the Northeast Area and the Citywide crimes per capita. Based on the assumption that the annual crime rate in the Northeast Area would remain constant at 0.024 crime per capita, the Project's residential service population could potentially generate approximately 27 new crimes per year.

The Northeast area's crime rate of 0.024 crime per capita, which is based on the number of crimes reported within a specified area with a given population, affects the "needs" projection for staff, facilities, and equipment for the LAPD. The data presented in Table IV.I-4 indicates a 1.3 percent decrease in crime between 2016 and 2017 and a 6.1 percent increase in crime between 2015 and 2017. Increases in the crime rate may be due to factors such as population increase and lack of police presence. The data also indicate a 16.5 percent decrease in arrests from 2016 and 2017 and a 33.6 percent decrease in arrests from 2015 and 2017. This decrease in arrests may be due to changes in legislation.

[17] *City of Los Angeles Police Department, Written Correspondence, dated October 28, 2016.*

**Table IV.I-4**
**Northeast Area Crime and Arrest Statistics**

| Crime and Arrests | 2017 [a] | 2016 [a] | 2015 [a] |
|---|---|---|---|
| **Violent Crimes** | | | |
| Homicide | 5 | 10 | 13 |
| Rape | 62 | 69 | 69 |
| Robbery | 317 | 306 | 318 |
| Aggravated Assault | 580 | 567 | 560 |
| ***Total Violent Crimes*** | **964** | **952** | **960** |
| **Property Crimes** | | | |
| Burglary | 793 | 781 | 845 |
| Motor Vehicle Theft | 1,087 | 1,074 | 872 |
| Burglary Theft from Vehicle | 1,818 | 1,818 | 1,579 |
| Personal / Other Theft | 1,382 | 1,420 | 1,430 |
| ***Total Property Crimes*** | **5,080** | **5,093** | **4,726** |
| ***Total Part I*** | **6,044** | **6,045** | **5,686** |
| Child / Spousal Abuse (Part I & II) | 584 | 498 | 553 |
| Shots Fired | 95 | 98 | 104 |
| Shooting Victims | 44 | 25 | 47 |
| **Arrests** | | | |
| Homicide | 2 | 10 | 9 |
| Rape | 2 | 7 | 17 |
| Robbery | 80 | 75 | 89 |
| Aggravated Assault [c] | 287 | 345 | 340 |
| Burglary | 102 | 108 | 77 |
| Larceny | 297 | 327 | 294 |
| Auto Theft | 151 | 156 | 114 |
| ***Total Violent*** | **371** | **437** | **455** |
| ***Total Part I Arrests*** | **921** | **1,028** | **940** |
| ***Total All Arrests*** | **3,169** | **3,836** | **4,775** |

*Notes:*
[a] *Crime Statistics for week ending December 31, in the respective calendar year.*
[b] *Part II Child/Spousal Abuse Simple Assaults not included in Part I Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.*
[c] *Statistics include domestic violence.*
*Source: LAPD, COMPSTAT Unit, Northeast Area Profile, accessed August 2018.*

**Table IV.I-5**
**2017 Crimes – Northeast Community and Citywide**

| Area | Crimes [a] | Population | Crimes per Capita |
|---|---|---|---|
| Northeast Area | 6,044 | 250,000 [b] | 0.024 |
| Citywide | 129,587 | 3,999,759 [c] | 0.032 |

*Sources:*
[a] *LAPD, COMPSTAT Unit, Northeast Area Profile and Citywide Profile, accessed August 2018.*
[b] *LAPD Written Correspondence, October 28, 2016.*
[c] *U.S. Census Bureau, Quickfacts, City of LA, population estimate for July 2017, accessed August 2018.*

# 3. Environmental Impacts

## c) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, a significant impact related to police protection would occur if a project were to result in the following:

***Threshold a) Result in substantial adverse physical impacts associated with the provisions of new or physically altered police protection facilities, the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

a) The L.A. CEQA Thresholds Guide (Thresholds Guide) identifies the following criteria to evaluate police protection services: The population increase resulting from the proposed Project, based on the net increase of residential units or square footage of non-residential floor area;

b) The demand for police services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (i.e. facilities, equipment, and officers) and the project's proportional contribution to the demand; and

c) Whether the project includes security and/or design features that would reduce the demand for police services.

## d) Methodology

Demand for police services is directly affected by the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in any one of these factors could affect demands for police protection services or the LAPD's ability to provide an acceptable level of service. For purposes of this analysis, the following section addresses the Project's effects on the ability of police personnel to adequately serve existing and future population in the Project vicinity, taking into consideration the Project's security and/or design features intended to reduce the demand for police protection services; and potential need for new or expanded police facilities.

The analysis presents statistical data for the Northeast Community and Citywide, including the ratio of crimes to residents and the ratio of officers to residents. The ratio of officers to residential population is used by LAPD as an indicator of the level of service offered and provides a basis for measuring the increase in policing required for the Project.

The LAPD does not provide crime rates or officer service ratios for non-residential uses and does not use such ratios to measure service levels. The non-residential population is calculated using Police Service Population Conversion Factors presented in the L.A. CEQA Thresholds Guide. The calculation is based on the increase in Project Site activity, netting out the existing commercial uses. The analysis reviews the Project characteristics and security and/or design features, and the use of on-site and private security provisions to reduce the potential effects of the Project on the need for police services. Based on these criteria, and consultation with the LAPD, a determination was made as to whether police facilities could accommodate the additional demand for police protection services resulting from the Project without the need for a new facility or the alteration of existing facilities.

The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact, but a social or economic impact.[18] Where a project causes a need for additional police protection services resulting in the need to construct new facilities or additions to existing facilities and construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact related to police protection services will result from the construction of new or expanded police protection facilities. In the event that the City determines that expanded or new policies facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be

[18] *City of Hayward v. Board Trustee of California State University (2015) 242 Cal, App. 4th 833, 847*

located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a Categorical Exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

## e) Project Design Features

The following project design features are applicable to the Project.

**Project Design Feature POL-PDF-1:** During construction, the Project applicant will implement appropriate temporary security measures, including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided on a weekly basis. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor).

**Project Design Feature POL-PDF-2:** Prior to the issuance of a certificate of occupancy, the Project Applicant will submit a diagram of the Project Site to the LAPD Northeast Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

**Project Design Feature POL-PDF-3:** The Project will include nighttime security lighting of building entries and walkways, private on-site security, a closed circuit security camera system monitored by on-site professional security, and secure parking facilities with sufficient lighting to maximize visibility and reduce areas of concealment.

## f) Analysis of Project Impacts

***Threshold a) Would the Project result in substantial adverse physical impacts associated with the provisions of new or physically altered police protection facilities, the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?***

## (1) Project Impacts

### *(a) Construction Impacts*

When not properly secured, construction sites can attract criminal activity and adversely affect local law enforcement. The proposed Project has the potential to adversely affect police services during the construction period due to the potential for trespassers, theft, and vandalism, which could potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. With implementation of Project Design Feature TRANS-PDF-1, which involves development of a construction traffic management plan, construction truck trips would not cause significant impacts during the A.M. and P.M. commuter peak hours for the time of peak construction truck activity. In addition, a construction work site traffic control plan would be submitted to LADOT for review and approval prior to the start of any construction work as is standard protocol (see Project Design Feature TRANS-PDF-2, in Section IV.K Traffic/Transportation.) Lastly, implementation of Project Design Feature POL-PDF-1, above, would provide construction fencing and screening of the construction activity from view at the local street level and locked entry to limit access by the general public. Construction activities would be short-term and temporary for the area. ***The Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Impacts to police services from Project construction activities would be less than significant.***

### *(b) Operation Impacts*

The proposed Project has the potential to place additional demands upon police protection services during its operation due to the increased activity on the Project Site. The proposed Project would include up to 419 dwelling units and approximately 64,000 square feet of commercial space that would generate up to 1,090 new residents and approximately 140 employees.[19,20] The Northeast geographic area is approximately 29 square miles and consists of approximately 295 sworn personnel and 16 civilian support staff. The number of calls requesting police responses to retail burglaries, vehicle burglaries, damage to vehicles, traffic related incidents of crimes against persons may increase with the increase in on-site activity and increase in traffic on adjacent streets and arterials. Based on the assumption that the annual crime rate in Northeast Los

[19] *Based on American Community Survey (ACS) Public Use Microdata Sample (PUMS) data, the citywide average population for multifamily housing is estimated to be 2.6 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, March 2019).*

[20] *Based on the assumption of 1 employee per 134 square feet of restaurant space, 1 employee per 228 square feet of office space, and 35 employees for the urban farm. Source: U.S. Green Building Council, Building Area per Employee by Business Type Table, May 13, 2008.*

Angeles Area would remain constant at 0.024 crime per capita, the Project's residential service population could potentially generate approximately 27 new crimes per year (see Table IV.I-5, above).

As a mixed-use project, the proposed Project would provide an increased community presence as more eyes are on the street. To further reduce the potential for increased demand upon police services in the area, the proposed Project will include strategically positioned low-level and security lighting to enhance public safety (i.e., Project Design Feature POL-PDF-3). Visually obstructed and infrequently accessed "dead zones" will be limited and, where possible, security will be controlled to limit public access. As provided in Project Design Feature POL-PDF-3, the proposed Project will also include nighttime security lighting of building entries and walkways, private on-site security, a closed circuit security camera system, and secure parking facilities with sufficient lighting to maximize visibility and reduce areas of concealment. Furthermore, as recommended in the LAPD Correspondence (dated October 28, 2016) in Appendix I, the proposed Project will consult with the LAPD's Crime Prevention Through Environmental Design personnel regarding the incorporation of intrusion prevention systems and crime prevention features. As noted in Project Design Feature POL-PDF-2, the Applicant will also submit a diagram of the Project Site to the LAPD's Northeast Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

The proposed Project would include security/design features that would reduce the demand for police services. ***The proposed Project would not result in adverse physical impacts associated with the operation of new or altered facilities. Impacts with regard to police services during Project operation would be less than significant.***

### **(2)** Mitigation Measures

The proposed Project's impacts with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

The proposed Project's impacts to police protection services would be less than significant without mitigation.

## g) Cumulative Impacts

### (1) Impact Analysis

The proposed Project, in combination with ambient growth and the 12 related projects (See Section III, Environmental Setting), would increase the demand for police protection services in the Project Site area. Similar to the proposed Project, each of the related projects would be individually subject to review by their respective enforcement and monitoring agencies, i.e. the LAPD for projects within the Los Angeles, and would be required to comply with all applicable safety requirements of the enforcement and monitoring agencies in order to address police protection services demands adequately. Impacts created by new development would be reduced by the incorporation of required security measures into each proposed development, which would revitalize the surrounding area. Ongoing revitalization efforts would help reduce the cumulative crime impacts in the surrounding area. Further, the continuous presence of people and activity on-site and in the Project area would deter criminal activity, as more eyes would be on the street. In addition, similar to the Project Site, the related projects would reduce blight on underutilized sites. The LAPD also monitors the need for police services and proposes appropriate service enhancement through the yearly budgetary process.

Based on the police service population conversion factors provided in the *L.A. CEQA Thresholds Guide*, growth from the related projects that fall within the boundaries of the Northeast Los Angeles Area is estimated to result in a service population of approximately 2,526 persons, including both residents (permanent population) and employees (daytime population). As described above, the proposed Project would contribute to this cumulative increase by generating a net service population of approximately 3,796 persons, including permanent residents and daytime workers. The additional population associated with related projects and general growth in the Project area would likewise have an effect on crime in the Northeast Los Angeles Area, which could increase based on per capita crime rates.

With regard to cumulative impacts on police protection, consistent with *City of Hayward v. Board Trustees of California State* University (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate police protection is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including service enhancement that may become necessary to achieve the required level of service, would be identified and allocated according to the priorities at the time. If LAPD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre

in size, and (3) could qualify for a Categorical Exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on police protection services would be less than significant. ***On this basis, the proposed Project would not make a cumulatively considerable impact to police protection services, and, as such cumulative impacts on police protection services would be less than significant.***

### **(2)** Mitigation Measures

Cumulative impacts with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

### **(3)** Level of Significance After Mitigation

Cumulative impacts to police protection services would be less than significant without mitigation.

# VI. Environmental Impact Analysis

# I. Public Services

## 3. Schools

## 1. Introduction

The following Section addresses the proposed Project's impacts upon the Los Angeles Unified School District (LAUSD) and the local schools servicing the Project area. The purpose of this section is to determine whether the public schools serving the Project Site can accommodate the increase in student generation and whether the increase in student generation would result in the development or construction of new school facilities, which in turn would have the potential to generate environmental impacts. To the extent that the proposed Project would result in any direct impacts to existing schools or school facilities (e.g., detours to pedestrian routes, air quality impacts, construction noise impacts, etc.), such impacts are addressed in each respective section of this EIR.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) Senate Bill 50

Pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code. [21]

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any

[21] *Los Angeles Unified School District, School Facilities Fee Plan, March 2, 2002.*

contrary provisions in CEQA or other State or local laws (Government Code Section 65996).

The California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Needs Analysis has been prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code.[22]

#### (2) Open Enrollment Policy

The open enrollment policy is a state-mandated policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.

## b) Existing Conditions

### (1) Los Angeles Unified School District

Public education services are provided within the Project area by LAUSD. The LAUSD is divided into eight local districts. The Project Site is located within LAUSD Board District 5. As shown in Table IV.I-6, the Project Site is currently served by one elementary school (Atwater Avenue Elementary School), one middle school (Washington Irving Middle School), and high schools in the Sotomayor High School Zone of Choice[23], including Sonia Sotomayor Learning Academies History and Dramatic Arts, Sonia Sotomayor Learning Academies Los Angeles River School, PUC Early College Academy for Leaders and Scholars, and Alliance Tennenbaum Family Technology High School. The locations of these schools are shown in Figure IV.I-3, School Location Map. Table IV.I-7, below,

[22] *Los Angeles Unified School District, Developer Fee Program, Notification of Fee Increases, November 7, 2007.*

[23] *According to LAUSD, Zones of Choice are geographic areas comprised of multiple high school options. The small school options in each Zone are open to all resident students and represent the demographics of the local area. All school options offer college preparatory curriculum, A-G standards-based instruction (i.e., a sequence of 15 courses that are required for admission to the California State University and University of California systems), and preparation for college and careers. LAUSD, About Zones of Choice, https://achieve.lausd.net/Page/1888, accessed August 1, 2018.*

shows the current enrollment and capacities of these schools. As shown in Table IV.I-7, Washing Irving Middle School is currently experiencing overcrowding.

**Table IV.I-6**
**Resident Schools Serving the Project Site**

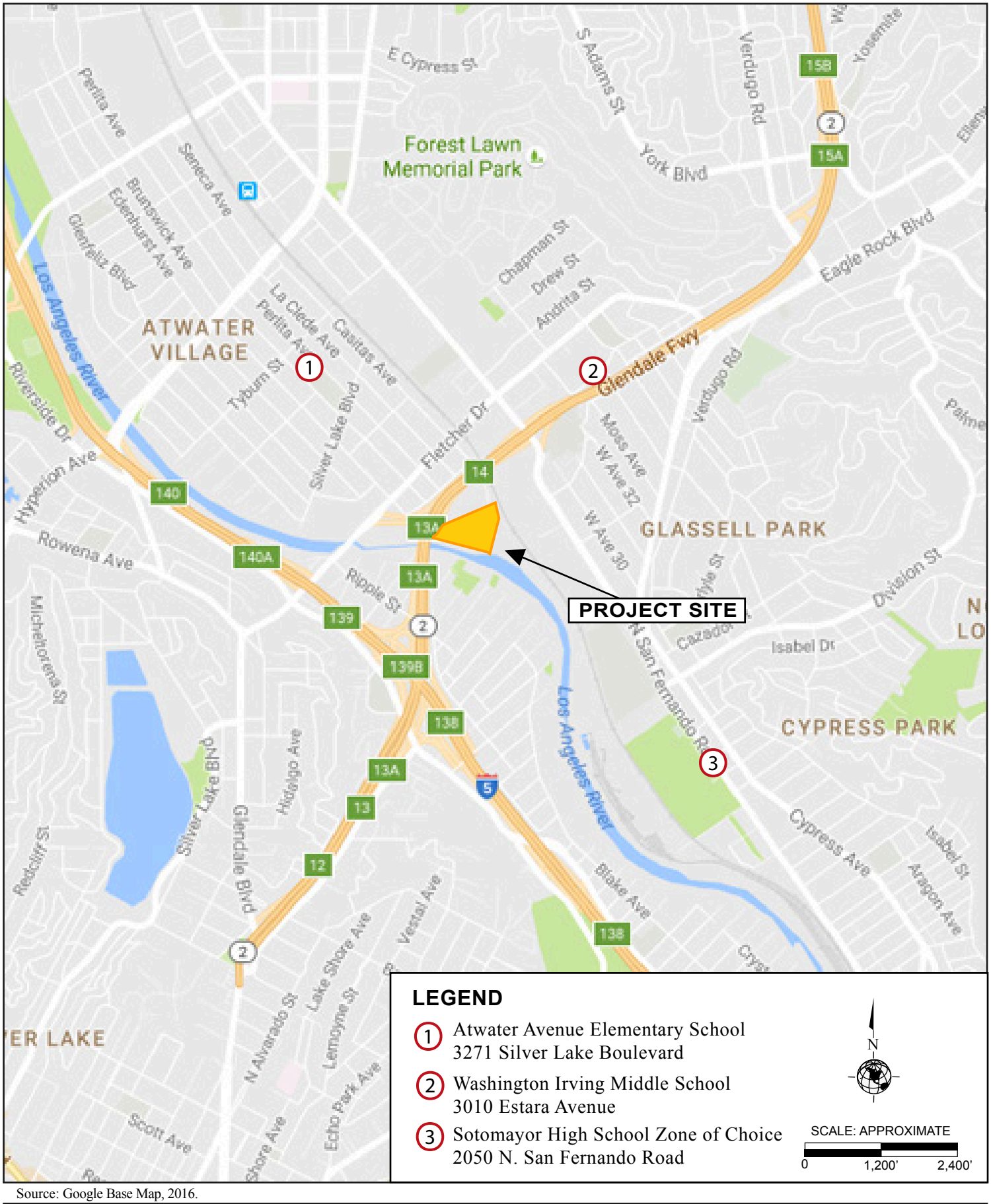
| School Name | Grades | Address |
|---|---|---|
| Atwater Avenue Elementary | K-6 | 3271 Silver Lake Boulevard |
| Washington Irving Middle School | 7-8 | 3010 Estara Avenue |
| Sotomayor High School Zone of Choice, which includes:<br>-Sonia Sotomayor Learning Academies History and Dramatic Arts<br>-Sonia Sotomayor Learning Academies Los Angeles River School<br>-PUC Early College Academy for Leaders and Scholars<br>-Alliance Tennenbaum Family Technology High School | 9-12 | 2050 N. San Fernando Road |

*Note: Some schools require an application process prior to student enrollment.*
*Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed August 2016.*
*Los Angeles Unified School District, Written Correspondence, dated October 26, 2016.*

**Table IV.I-7**
**Current 2017-2018 Enrollment and Capacity of Schools Serving the Project Site**

| School Name | Current Capacity | Resident Enrollment | Current Seating Overage/ (Shortage) | Overcrowded Now? |
|---|---|---|---|---|
| Atwater Avenue Elementary | 329 | 274 | 55 | No |
| Washington Irving Middle School | 855 | 1,183 | (328) | Yes |
| Sotomayor High School Zone of Choice [a] | 2,156 | 1,532 | 624 | No |

*Note:*
[a] *Sotomayor High School Zone of Choice includes: 1) Sonia Sotomayor Learning Academies History and Dramatic Arts, 2) Sonia Sotomayor Learning Academies Los Angeles River School, 3) PUC Early College Academy for Leaders and Scholars, and 4) Alliance Tennenbaum Family Technology High School.*
*Source: Los Angeles Unified School District, Written Correspondence, dated September 6, 2018.*




Source: Google Base Map, 2016.

Figure IV.I-3
School Location Map

### (2) Private and Charter Schools in the Project Vicinity

The Project area is also served by several private schools and charter schools within a two-mile radius. These schools are identified in Table IV.I-8, below. As shown, there are approximately eight private and charter schools located in close proximity to the Project Site.

**Table IV.I-8**
**Private and Charter Schools in the Project Vicinity**

| School Name | Grades | Address |
|---|---|---|
| International School of Los Angeles – Los Feliz Campus | Preschool - 8 | 4155 Russell Avenue |
| Celerity Octavia Charter School | K-8 | 3010 Estara Avenue |
| Los Feliz Charter School for the Arts | K-8 | 2709 Media Center Drive |
| Divine Saviour School | K-8 | 624 Cypress Avenue |
| St. Bernard Catholic School | K-8 | 3254 Verdugo Road |
| St. Teresa of Avila Catholic School | K-8 | 2215 Fargo Street |
| Holy Trinity Catholic School | Preschool - 8 | 3716 Boyce Avenue |
| Ribet Academy | Preschool - 12 | 2911 N. San Fernando Road |
| *Note: Some schools require an application process prior to student enrollment.*<br>*Source: www.privateschoolreview.com, accessed August 2018.* | | |

# 3. Environmental Impacts

## a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project were to result in the following:

***Threshold a) Result in a substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts on schools:

a) The population increase resulting from the Project, based on the net increase of residential units or square footage of non-residential floor area;

b) The demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (i.e., facilities, equipment and personnel) and the project's proportional contribution to the demand;

c) Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and

d) Whether the project includes features that would reduce the demand for school services (e.g., onsite school facilities or direct support to LAUSD).

## b) Methodology

The analysis of environmental impacts of a project upon schools is determined based on the enrollment and capacity of existing and reasonably foreseeable proposed schools in a project area, and the number of students that would be generated by the proposed Project upon full buildout and occupancy. Based on these projections, it is determined whether a project would exceed the capacity of any existing or proposed school such that a new or expanded school would be needed.

## c) Project Design Features

No specific project design features are proposed with regard to schools.

## d) Analysis of Project Impacts

***Threshold a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?***

## (1) Project Impacts

### *(a) Construction Impacts*

The proposed Project would generate part-time and full-time jobs during construction activities. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the proposed Project. Therefore, construction employment generated by the proposed Project would not result in a substantial increase in the resident population or notable increase in demand for schools in the vicinity of the Project Site. ***Impacts to school facilities during the proposed Project construction would be less than significant.***

### *(b) Operation Impacts*

The proposed Project would result in the development and operation of 419 new multi-family housing units with an estimated 1,090 new residents. As there are no students currently residing on the Project Site, the Project's student generation would result in a net increase in students attending Project area schools. Table IV.I-9, Proposed Project Estimated Student Generation, includes student generation rates for commercial uses and multi-family residential uses. Existing and proposed on-site land uses were factored to estimate the school-age student generation numbers for existing and future conditions. As indicated in Table IV.I-9, below, the proposed Project is estimated to generate approximately 87 additional elementary students, 24 middle school students, and 48 high school students for a total of 159 students. While it is likely that some of the students generated by the proposed Project would already reside in areas served by LAUSD and would already be enrolled in LAUSD schools, it is assumed that all students generated by the proposed Project would be new to the LAUSD for a conservative analysis.

**Table IV.I-9**
**Proposed Project Estimated Student Generation**

| Land Use | Size | Elementary School Students | Middle School Students | High School Students | Total Students |
|---|---|---|---|---|---|
| **Existing Uses** | | | | | |
| Industrial (117,000 sf) [b] | 204 emp | 25 | 7 | 14 | 46 |
| **Total Existing Students:** | | **25** | **7** | **14** | **46** |
| **Proposed Project** | | | | | |
| Multi-Family [a] | 419 du | 95 | 26 | 53 | 174 |
| Commercial (64,000 sf) [b] | 140 emp | 17 | 5 | 9 | 31 |
| **Total Project Student Generation:** | | **112** | **31** | **62** | **205** |
| *Less Existing Students:* | | *-25* | *-7* | *-14* | *-46* |
| **NET Student Generation:** | | **87** | **24** | **48** | **159** |

*Notes: sf = square feet; du = dwelling units; emp = employees*

[a] *Student generation rates are as follows for multi-family residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students per unit.*

[b] *It is assumed that 0.2249 students are generated per commercial and industrial employee (Table 15 of the 2018 Developer Fee Justification Study). Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school).*

*Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.*

The projected student enrollment and seat capacities for the schools serving the Project Site is listed in Table IV.I-10, provided by the LAUSD Facilities Services Division. As shown in Table IV.I-10, Atwater Elementary and Sotomayor High School Zone of Choice schools are below capacity and would, therefore, be able to accommodate the additional students generated by the proposed Project. However, based on written correspondence from the LAUSD, the Washington Irving Middle School would experience overcrowding in the future.

As stated above, pursuant to SB 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the mandatory payment of developer fees to the LAUSD is deemed to provide full and complete mitigation of school facilities impacts. The manner in which LAUSD would accommodate the additional high school students resulting from the proposed Project is subject to separate planning and CEQA review by LAUSD. Upgrades to existing schools and the construction of new schools is addressed by the LAUSD's Facilities Services Division, which is responsible for the execution of the District's current bond programs, the maintenance and operations of schools, the utilization of existing assets, and master planning for future capital

projects.[24] The Facilities Services Division Strategic Execution Plan (2015) outlines the New School Construction Plan, the Repair and Modernization Program, the Joint Use/Innovation Fund and Charter Facilities Program, the Capital Improvement Program, and the Capital Needs Assessment Master Planning and Facilities Condition Assessment. ***Therefore, the proposed Project's operational impacts upon schools would be less than significant.***

**Table IV.I-10**
**Projected 2015-2016 Enrollment and Capacity of Schools Serving the Project Site**

| School Name | Projected Capacity | Projected Resident Enrollment | Projected Seating Overage/ (Shortage) | Overcrowding Projected in Future? |
|---|---|---|---|---|
| Atwater Avenue Elementary | 329 | 270 | 59 | No |
| Washington Irving Middle School | 855 | 989 | (134) | Yes |
| Sotomayor High School Zone of Choice [a] | 2,156 | 1,373 | 783 | No |

*Note:*
[a] *Sotomayor High School Zone of Choice includes: 1) Sonia Sotomayor Learning Academies History and Dramatic Arts, 2) Sonia Sotomayor Learning Academies Los Angeles River School, 3) PUC Early College Academy for Leaders and Scholars, and 4) Alliance Tennenbaum Family Technology High School.*
*Source: Los Angeles Unified School District, Written Correspondence, dated September 6, 2018.*

As stated above, payment of applicable development school fees to the LAUSD would offset additional student enrollment at schools serving the Project Site. ***Therefore, the proposed Project would not result in any adverse physical impacts associated with the provision of new or physically altered school facilities. Impacts to schools would be less than significant.***

### (2) Mitigation Measures

The proposed Project impacts upon school services would be less than significant with the payment of development fees for schools to LAUSD prior to the issuance of building permits pursuant to SB 50. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

The proposed Project impacts upon school services would be less than significant without mitigation.

[24] *Facilities Services Division, Los Angeles Unified School District, website: http://www.laschools.org/new-site/, accessed November 2016.*

## e) Cumulative Impacts

### (1) Impact Analysis

The proposed Project and the nine related projects within the City of Los Angeles are expected to result in a cumulative increase in the demand for LAUSD school services. Four related projects (Related Project No. 7 through 9, 13, and 14) are within the City of Glendale and would not contribute to school demand within the City of Los Angeles and, therefore, are not considered within the cumulative student generation table below. Additionally, Related Project No. 5 includes the development of a charter school, which would help alleviate existing demand on schools and would not generate new students. Therefore, Related Project No. 5 is not included in the cumulative student generation table below.

Together, the nine related projects within the City of Los Angeles would have the potential to generate students that would attend the same schools as the proposed Project. As shown below in Table IV.I-11, the nine related projects would generate approximately 290 elementary students, 79 middle school students and 163 high school students. Of the 532 students generated by the proposed Project and related projects, the proposed Project would generate 159 students which represents approximately 30 percent of the cumulative students generated (see Table IV.I-9, above). Some of the employees generated by the nine related projects within the City of Los Angeles may already reside in areas served by the LAUSD and would have students that may already be enrolled in LAUSD schools. It can also be reasonably expected that some new students would attend private schools, which are not accounted for in the LAUSD student capacity statistics presented in Table IV.I-9, above.

Furthermore, as with the proposed Project, each of the 14 related projects would be expected to pay the required developer school fees to their respective school district (pursuant to SB 50) to reduce any impacts they may have on school services. While cumulative development would appear to cause new student generation to exceed current seating capacity, the provisions of SB 50, discussed above, are considered to provide full and complete mitigation of school facilities impacts. ***The payment of these fees by the proposed Project and the related projects would be mandatory and would reduce the cumulative impact upon school services to a less-than-significant level.***

**Table IV.I-11**
**Estimated Cumulative Student Generation**

| Land Use | Size | Elementary School Students | Middle School Students | High School Students | Total Students |
|---|---|---|---|---|---|
| Multi-Family [a] | 766 du | 174 | 47 | 99 | 320 |
| Commercial Uses | 232 emp [b] | 29 | 8 | 16 | 53 |
| ***Related Projects Total:*** | | ***203*** | ***55*** | ***115*** | ***373*** |
| Proposed Project Net Total: | | 87 | 24 | 48 | 159 |
| **Cumulative Total:** | | **290** | **79** | **163** | **532** |

*Notes: du = dwelling units; emp = employees*
[a] *Student generation rates are as follows for multi-family residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students per unit.*
[b] *The number of employees in the City of Los Angeles were estimated using calculations from Table IV.H-8 in Section H. Population, Housing, and Employment.*
[c] *It is assumed that 0.2249 students are generated per commercial and industrial employee (Table 15 of the Developer Fee Justification Study). Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school).*
*Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.*

### (2) Mitigation Measures

Cumulative impacts upon school services would be less than significant with the payment of development fees for schools to LAUSD prior to the issuance of building permits pursuant to SB 50. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Cumulative impacts upon school services would be less than significant without mitigation.

# IV. Environmental Impact Analysis

# I. Public Services

## 4. Parks and Recreation

## 1. Introduction

The following section addresses the proposed Project's impacts upon the City's public recreation infrastructure and parks and is based, in part, on the applicable policies of the Public Recreation Plan, which is part of the Service Systems Element of the General Plan, and the open space code provisions of the LAMC.

## 2. Environmental Setting

### a) Regulatory Framework

(1) State

*(a) The Quimby Act*

California Government Code Section 66477 (Quimby Act) authorizes cities and counties to enact ordinances, which would require the dedication of land or payment of fees for park and recreational purposes for project involving residential subdivisions. The Quimby Act states that the dedication of land, or payment of fees, or both, shall not exceed the proportionate amount necessary to provide three acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhoods or community park area exceeds that limit.[25]

*(b) Rio de Los Angeles State Park General Plan and EIR*

The Rio de Los Angeles State Park is located in the Northeast Los Angeles area. The park is located next to the former Taylor Yard complex, which was subdivided into ten parcels, some of which were further subdivided for sale purposes. Parcels D and G-1 were purchased by the California State Parks for Rio de Los Angeles State Park. In May 2005, the California Department of Parks and Recreation prepared the Rio De Los Angeles State Park General Plan and Environmental Impact Report to serve as a guide for future development, parkland acquisition, and connections to trails, parks, and other public facilities on the 20 acres of Parcel D and the 17-acre Parcel G-1 being developed

[25] *California Government Code, Section 66477 (Quimby Act).*

by the State. Although these two parcels are non-contiguous, they are connected through a maintenance road / pedestrian path along the Los Angeles River, which also extends along the southern property line of the Project Site.

The undeveloped open space area located immediately east of the Project Site is known as Parcel G-1. According to the Rio De Los Angeles State Park General Plan, Parcel G-1 would be entirely improved as Naturalized Open Space and used for potential interpretive purposes. The Naturalized Open Space Element would protect natural, cultural, and aesthetic resources and would permit low to moderate intensity uses. Interpretive programs offer opportunities to learn and enjoy recreational activities, such as bird watching and nature walks. These areas afford greater protection for sensitive natural resources and aim to provide a natural setting in which to enjoy and appreciate environmental and cultural experiences. The General Plan also aims to promote the re-establishment of native wildlife and insects by incorporating re-vegetation and habitat creation on Parcel G-1 that would be designed to encourage use of the site by wildlife, including use of migratory birds that commonly use the Los Angeles River ecosystem. The Naturalized Open Space area helps to connect visitors to natural habitats including those that may have once existed in and near the Park site and strengthens the connection to the Los Angeles River. Stewardship, nature study, observation, bird watching, and learning about the natural heritage of the Los Angeles region would be the major activities. [26]

Currently, Parcel G-1 hosts artists' projects, performances, and events, which is also known as the Bowtie Project. California State Parks and Clockshop, an arts organization, work together on the Bowtie Project, which is a collaboration of artwork and performances and operates on this open space area. Although this area has minimal amenities for visitors (no drinkable water or seating), the events and open space are open to the public for recreational uses.[27]

### (2) Local

#### *(a) Public Recreation Plan*

The Public Recreation Plan, a portion of the Service Systems Element of the City of Los Angeles General Plan, categorizes parks into three groups: neighborhood, community and regional. According to the Public Recreation Plan, neighborhood parks are ideally five to 10 acres in size, have a service radius of approximately one half mile, and are pedestrian-accessible without crossing a major arterial street or highway/freeway.

[26] *California State Parks, Rio De Los Angeles State Park General Plan and Final Environmental Impact Report, May 2005.*

[27] *Clockshop, The Bowtie Project, website: https://clockshop.org/project/bowtie/, accessed September 2016.*

Community parks are ideally 15 to 20 acres in size, have a service radius of two miles, and are easily accessible to the area served. Regional parks are ideally greater than 50 acres in size, provide specialized recreation facilities and/or attractions, and have a service radius encompassing the entire Los Angeles region.[28]

The Public Recreation Plan provides standards for the provision of recreational facilities throughout the City and includes Local Recreational Standards. The standard ratio of Neighborhood Recreational Sites to population is two acres per 1,000 people. The standard ratio of Community Recreation Sites to population is also two acres per 1,000 people.[29]

*(b) Department of Recreation and Parks New Parks Initiative (50 Parks Initiative)*

In 2010, the DPR found in the 2009 Citywide Needs Assessment that the City's over 420 parks and facilities are not equitable distributed and many communities do not have parks within a reasonable distance. The DPR recognizes the need to develop a coordinated long-term initiative to meet the recreation needs of current and future residents of the City. The purpose of this initiative is to substantially increase the number of parks and facilities available across the City, with a specific focus on densely populated neighborhoods and communities that lack sufficient open space and recreational services. The development of new public parks in neighborhoods where a large percentage of residents do not live in close proximity to a park or recreational facility provides innumerable physical, social, health, and environmental benefits to those communities, and to the City as a whole. New Parks would help stabilize neighborhoods and property values by providing needed public infrastructure improvements, removing blight caused by abandoned buildings and empty lots, and beautifying underutilized public property.[30] With the 50 Parks Initiative, many new parks have been built and are continually being built throughout the City. Based on a 50 Parks Initiative Study, the new parks have improved the health of local residents, increased property values for the affected neighborhoods, perceived no significant impacts on local crime, and provided spaces for social interaction where no space previously existed.[31]

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[28] *City of Los Angeles Department of Planning, Public Recreation Plan, website: http://cityplanning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf, accessed September 2016.*

[29] *Ibid.*

[30] *City of Los Angeles, Department of Recreation and Parks, 50 Parks Initiative, website: http://www.laparks.org/50parks, accessed September 2016.*

[31] *Sol Price School of Public Policy, University of Southern California, The Los Angeles Parks Foundation: A Study of the 50 Parks Initiative, May 2014.*

*(c) City of Los Angeles Quimby and Parkland Fees*

As authorized under the State Quimby Act, on September 7, 2016, the City Council approved the Parks Dedication and Fee Update Ordinance, Ordinance No. 184,505. The Ordinance applies to all new residential dwelling units and joint living and work quarters, except affordable housing units and secondary dwelling units in single-family zones. The Ordinance states that subdivision projects consisting of more than 50 residential units are subject to a Quimby in-lieu fee. All other residential projects are subject to a park mitigation fee. In lieu of paying a park fee, land may be dedicated to the City of Los Angeles for public park and recreational facility purposes, at the City's discretion. The effective date of the Park Fee Ordinance is January 11, 2017. The Park Fee Ordinance provides that any project that has acquired vested rights under Section 12.26.A.3 of the LAMC prior to the effective date of the Park Fee Ordinance, and/or has an approved vesting tentative map pursuant to Section 17.15 of the LAMC, the application for which has been deemed complete prior to the effective date of the Park Fee Ordinance, shall not be subject to the park fees set forth in the Park Fee Ordinance. The Project's entitlement applications, including its vesting tentative map application, were deemed complete on November 7, 2016, prior to the Park Fee Ordinance becoming effective. As such, the Project is not subject to the park fee provisions of the Park Fee Ordinance. Rather, the Project is subject to the provisions that were in effect at the time the Project was deemed complete. With regards to the proposed Project, the proposed Project would be required to pay a park mitigation fee.

LAMC Section 12.33 provides a discussion of the type of fees, subject properties, and formula for calculating parkland dedication and/or payment of fees. The Park Fee Ordinance amends Sections 12.21, 12.33, 17.03, 17.12 and 17.58 of the LAMC, deletes Sections 17.07 and 19.01 of the LAMC, and adds Section 19.17 of the LAMC.

*(d) Los Angeles Municipal Code - Required Open Space*

The LAMC provides minimum standards for the amount of "open space" that residential projects should provide on-site. Open space includes both common and private greenspace and recreational amenities that meet specific standards. However, it should be noted that not all areas designed as open space in the LAMC would be classified as park or recreational space under the City's Quimby and Parkland fee programs, under the General Plan Framework Element, or by the DRP.

Pursuant to LAMC Section 12.21(G), new construction in the City of six or more dwelling units on a lot is required to provide a minimum of 100 square feet of usable open space for each dwelling unit having less than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet for each dwelling unit having more than three habitable rooms. Usable space is defined as an area which is

designed and intended to be used for active or passive recreation. Usable open space may consist of private and/or common area open space; however, common open space areas must be a minimum of 400 square feet and must constitute at least 50 percent of the total open space provided. Open space does not generally include parking areas, driveways, or required front and side yards. A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs, or trees and at least one 24-inch box tree is required for every four dwelling units.

*(e) The Los Angeles River Revitalization Master Plan*

In April 2007, the City of Los Angeles released the Los Angeles River Revitalization Master Plan (Master Plan) to accomplish four main goals: 1) revitalize the Los Angeles River, 2) green the neighborhoods, 3) capture community opportunities, and 4) create value. The residents of Los Angeles have articulated a strong desire for a "greener" Los Angeles that may be experienced by everyone. Key values shared in the public participation process are environmental responsibility, social and geographic equity, community engagement and support, designs that are based on sustainable economics, and a system-wide perspective toward the Los Angeles River watershed. The Master Plan identifies the Taylor Yard as an Opportunity Area that demonstrates a significant opportunity for ecosystem restoration on a large scale. As discussed above, the vacant area located to the east and southeast of the Project Site is part of the Taylor Yard. The Master Plan discusses that this portion of the Taylor Yard would allow for multi-use and bicycle trails, paseo promenades, bridge underpasses, and neighborhood gateways along the Los Angeles River.

## b) Existing Conditions

### (1) 2009 Citywide Community Needs Assessment

According to the City of Los Angeles Department of Recreation and Parks (DRP) 2009 Citywide Community Needs Assessment, parkland acreage totals exceed 36,000 acres within City limits. Total acreage by category is shown in Table IV.I-12, below.

As Table IV.I-12 shows, the total acres of mini parks, neighborhood parks and community parks in the City of Los Angeles are well below the standards of the Public Recreation Plan, and the City is deficient in parkland. The 2009 Citywide Community Needs Assessment identifies the need for neighborhood and community parks and indicates that the amount of existing neighborhood and community parkland in the City is low relative to the density of the City. The area near the Project Site is urbanized and developed and also falls below the parkland ratio.

**Table IV.I-12**
**City of Los Angeles Recreation and Park Facility Inventory**

| Category | Total Acres | Total Acres Per 1,000 Persons |
|---|---|---|
| Mini Parks | 50.76 | 0.013 |
| Neighborhood Parks | 773.72 | 0.198 |
| Community Parks | 2,763 | 0.759 |
| Regional and Large Urban Parks | 33,889 | 8.261 |
| **Total Parks** | **37,477** | **9.231** |

*Source: City of Los Angeles Department of Recreation and Parks, 2009 Citywide Community Needs Assessment, website: https://www.laparks.org/sites/default/files/projects/2009%20Community%20Needs%20Assessment%20-%20Final.pdf , accessed September 2016.*

### (2) Existing Recreation and Park Facilities Serving the Project Area

The DRP is responsible for managing all municipally owned and operated recreation and parks facilities, maintaining over 16,000 acres of parkland, including, but not limited to, 444 neighborhood and regional parks, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, 9 dog parks, 187 summer youth camps, 13 lakes, 92 miles of hiking trails, and hundreds of programs for youth, seniors, the physically disabled, and volunteers.[32]

The standard ratio of neighborhood and community parks to population that is used as a guideline by the City of Los Angeles Department of Recreation and Parks is two acres per 1,000 residents, within a one- to two-mile radius (for neighborhood and community parks, respectively). The Project Site is located within an urbanized area of the Northeast Los Angeles Community Plan area and is currently below the standard ratio. There are 12 parks and 4 recreation centers within a two-mile radius of the Project Site, totaling almost 728 acres. These facilities include: Marsh Park, Glenhurst Park, Rattlesnake Park, Juntos Park, Elysian Valley Park Recreation Center, Glassell Park and Recreation Center, Rio de Los Angeles State Park, Sunnynook River Park, Griffith Park Recreation Center, Elyria Valley Park, Elysian Valley Park, Silverlake Recreation Center and Dog Park, Cypress Park and Recreation Center, and Moon Canyon Park. Elysian Park accounts for 600 acres of the approximate 728 acres within a 2-mile radius of the Project Site. However, due to the large size, only a portion of the park lies within the 2-mile radius. Elysian Park is the second largest park in the Los Angeles region and provides many amenities for the residents and visitors in the City of Los Angeles. Because this park is located outside of the Northeast Los Angeles Community Plan area, the Northeast Los

[32] *City of Los Angeles Department of Recreation and Parks, Department, website: https://www.laparks.org/department/who-we-are, accessed August 2018.*

Angeles Community is currently below the standard ratio of parks serving local residents. Table IV.I-13, Recreation and Park Facilities within the Project Area, below, shows the parks and recreation facilities within 2 miles of the Project Site and includes information on park size, distance from the Project Site, and park amenities. Additionally, Figure IV.I-4, City of Los Angeles Existing Park Location Map, below, shows the location of each identified park.

The undeveloped parcel (Parcel G-1) of land to the east of the Project Site (2780 Casitas Avenue) is owned and operated by California State Parks and is an extension of the Rio de Los Angeles State Park. California State Parks and the Clockshop, an arts organization, work together on the Bowtie Project, which is a collaboration of artwork and performances and currently operates on this vacant space area. Although this area has minimal amenities for visitors, the events and open space are open to residents and guests for recreational uses. This vacant area is also slated for development of a public park with naturalized open space.[33]

[33] *California State Parks, Rio De Los Angeles State Park General Plan and Final Environmental Impact Report, May 2005.*

**Table IV.I-13**
**Recreation and Park Facilities within the Project Area**

| Park Name | Park Size (acres) | Park Amenities | Approx. Distance to Project Site (miles) |
|---|---|---|---|
| 1. Marsh Park | 4.0 | Walking paths, landscaping, open space, skate park and benches | 0.2 |
| 2. Glenhurst Park | 0.29 | Children play area, open space | 0.3 |
| 3. Rattlesnake Park | 0.33 | Open space that connects to the Los Angeles River Greenway Trail | 0.4 |
| 4. Juntos Park | 1.5 | Walking paths, open space, children play areas, and benches | 0.6 |
| 5. Elysian Valley Park Recreation Center | 2.0 | Recreation Center, baseball diamond, auditorium, basketball courts, children play area, handball courts, and soccer field | 0.7 |
| 6. Glassell Park and Recreation Center | 12.7 | Recreation Center, pool, child care center, children play areas, barbecue pits, baseball diamond, basketball courts, picnic tables, tennis courts, multi-purpose sports field, outdoor fitness equipment, softball diamond, and soccer field | 0.9 |
| 7. Rio de Los Angeles State Park | 40.4 | Children play area, community room, multi-purpose room, picnic tables, tennis courts, baseball diamond, soccer field, synthetic field, walking paths, and basketball courts | 0.9 |
| 8. Sunnynook River Park | 4.8 | Walking path, benches, and picnic tables | 1.3 |
| 9. Griffith Park Recreation Center | 12.0 | Recreation Center, Adult Community Center, pool, tennis courts, soccer field, children play area, open space, picnic tables and benches | 1.4 |
| 10. Elyria Canyon Park | 35.0 | Hiking trails, picnic tables, and picnic areas | 1.4 |
| 11. Elysian Valley Park* | 600 | Grace E. Simons Lodge, Chavez Ravine Arboretum, Bike path, hiking tails, horseshoe pits, baseball diamonds, open space, picnic areas golf course | 1.5 |
| 12. Silverlake Recreation Center and Dog Park | 6.9 | Dog park, recreation center, open space, children play area, basketball court, community room, indoor gym, picnic tables, and sport fields | 1.6 |
| 13. Cypress Park and Recreation Center | 3.5 | Recreation center, senior center children play area, baseball diamond, open space, sports fields, picnic area | 1.9 |
| 14. Moon Canyon Park | 4.5 | Open space, hiking tails, picnic areas | 1.9 |
| **Total Parkland (Approximate):** | **727.92** | | |

*Refer to Figure IV.I-4, City of Los Angeles Existing Park Location Map.*
** Only a portion of Elysian Valley Park is located within the 2-mile radius.*
*Sources: Park distances, size, and amenities were determined using:*
*(1) City of Los Angeles, Department of Recreation and Parks, http://www.laparks.org, accessed August 2018;*
*(2) City of Los Angeles, Navigate LA, http://navigatela.lacity.org/navigatela/, accessed August 2018; and*
*(3) Google Earth, accessed August 2018.*

**LEGEND**

1. Marsh Park
2. Glenhurst Park
3. Rattlesnake Park
4. Juntos Park
5. Elysian Valley Park Recreation Center
6. Glassell Park and Recreation Center
7. Rio de Los Angeles State Park
8. Sunnynook River Park
9. Griffith Park Recreation Center
10. Elyria Canyon Park
11. Elysian Canyon Park
12. Silverlake Recreation Center and Dog Park
13. Cypress Park and Recreation Center
14. Moon Canyon Park

Note: Park and Recreation Facility Number and Location correspond to Table IV.I-13 Recreation and Park Facilities within the Project Area.

Source: Google Maps, 2016.

Figure IV.I-4
City of Los Angeles Existing Park Location Map

# 3. Environmental Impacts

## a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to parks and recreation if it would:

***Threshold a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks; or***

***Threshold b) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or***

***Threshold c) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate parks and recreation:

(a) The net population increase resulting from the Project;

(b) The demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and

(c) Whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

## b) Methodology

The environmental impacts of a project upon parks and recreational facilities are determined based on the ability of inventory of existing parks and recreational facilities in a project area and the ability of such facilities to accommodate a project's demands upon parkland and recreation services. This is calculated based on the City's recommended service ratios for parkland to population, as well as project-specific recommendations of the DRP. Based on this evaluation, a determination is made whether a project would create substantial demands on existing parks and recreational facilities such that new or expanded parks and recreational facilities would be needed in the project vicinity.

## c) Project Design Features

No specific project design features beyond the open space and on-site amenity features described in Section II, Project Description, of this Draft EIR are proposed with regard to parks and recreation.

## d) Analysis of Project Impacts

***Threshold a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks;***

### (1) Project Impacts

Development of the proposed Project would include the construction of 419 residential dwelling units and 64,000 square feet of commercial space. It is estimated that the proposed Project would result in an increase of up to 1,090 new residents to the Northeast Los Angeles Community Plan Area and would, therefore, create an additional demand on the parks and recreation facilities. Based on the City's standard parkland ratio goal of two acres per 1,000 residents, the proposed Project would generate a need for approximately 2.18 acres of public parkland. This need would be met through a combination of on-site open space and amenity areas and monetary contributions to the Park and Recreational Sites and Facilities Fund for the provision of recreation and park facilities in the Project vicinity.

The proposed Project includes the development of 419 dwelling units and, thus, would be required to provide a minimum of 43,900 square feet of on-site open space pursuant to the requirements of LAMC Section 12.21-G. Table IV.I-14, below, provides a breakdown

of the amount of open space that would be required and proposed for the proposed Project.

**Table IV.I-14**
**Summary of Required and Proposed Open Space Areas**

| Open Space Code Requirements | | | |
|---|---|---|---|
| **Type** | **Number of Units** | **Square Feet Required [a]** | **Total Square Feet Required** |
| Less than three habitable rooms (Studio Units and 1-bedroom units) | 339 | 100 sf / du | 33,900 |
| Three habitable rooms (2-bedroom units) | 80 | 125 sf / du | 10,000 |
| **TOTAL OPEN SPACE REQUIRED** | | | **43,900** |

| Open Space Proposed by the Project | Area Proposed [b] |
|---|---|
| Ground Level (Courtyard) | 35,478 sf |
| Ground Level (Porches) | 18,888 sf |
| Second Level (Common area) | 3,810 sf |
| **TOTAL OPEN SPACE PROPOSED** | **58,176 sf** |

*sf = square feet*
*du = dwelling unit*
*Notes:*
[a] *LAMC Section 12.21-G,2*
[b] *Does not include approximately 1,920 sf of open space that is proposed on private balconies above the first level.*
*Source: Rios Clementi Hale Studios, September 29, 2016.*

The proposed Project would incorporate a variety of public and private open space areas and amenities throughout the Project Site to accommodate the needs of residents and visitors. As shown in Table IV.I-14, above, the proposed Project would provide approximately 58,176 square feet (1.34 acres) of total common open space and amenities on-site available exclusively to serve Project residents and their guests. Public open space areas would be provided in the ground level courtyard and second level common areas. Private open space areas would be provided on ground level porches and upper level balconies. The proposed Project would feature a variety of trees, shrubs, vines, and perennials. The proposed Project would provide a variety of on-site amenities, including, but not limited to, communal patio, pool deck, lounge seating, outdoor barbeque, and amenity deck. The proposed Project would also include a walking path along the southern and eastern portions of the Project Site, which would connect to the paved pedestrian/biking pathways along the Los Angeles River. The proposed Project's open space and on-site amenity design features are identified in Section II, Project Description. The conceptual open space and landscape plan for the ground floor and upper levels are shown in Figures II-5 and II-6, respectively.

The Project's entitlement applications, including its vesting tentative map application, were deemed complete on November 7, 2016, prior to the Park Fee Ordinance becoming effective. As such, the Project is not subject to the provisions of the Park Fee Ordinance. In addition to the on-site open space provided within the proposed Project, the proposed Project is required to pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.20.3(a)(1) for the construction of residential dwelling units. This fee would be deposited into a trust fund managed by the DRP for the sole purpose of park and recreational facility acquisition, expansion, and improvement. ***Therefore, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks. As such, the proposed Project's impact upon parks and recreational facilities would be less than significant.***

(2) Mitigation Measures

Project impacts with regard to maintaining service ratios or performance standards for parks or other recreational facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project impacts with regard to maintaining service ratios or performance standards for parks or other recreational facilities would be less than significant without mitigation.

***Threshold b) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

(1) Project Impacts

As noted in response to Appendix G Threshold Question a) above, the proposed Project would result in an increase of up to 1,090 new residents to the Northeast Los Angeles Community Plan Area and would, therefore, create an additional demand on existing parks and recreation facilities serving the project area. This demand would be offset, in part, by the provision of 58,176 square feet of on-site open space and amenities, including, but not limited to, a communal patio, pool deck, lounge seating, outdoor barbeque, and amenity deck, and a walking path along the southern and eastern portions of the Project Site providing a direct connection to the paved pedestrian/biking pathways along the Los Angeles River. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would

not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and on-site amenity features. The provision of on-site open space and recreational amenities would reduce the Project's increased demand for off-site recreational facilities. Furthermore, the proposed Project's payment of applicable Quimby fees (LAMC Section 17.12) and Dwelling Unit Construction Tax (LAMC Section 21.10.3(a)(1)) would be utilized for park and recreational facility acquisition, expansion, and improvement. ***As such, Project operation would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts on parks and recreational facilities during Project operation would be less than significant.***

(2) Mitigation Measures

Project impacts with regard to the use of existing neighborhood and regional parks or other recreational facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project impacts with regard to the use of existing neighborhood and regional parks or other recreational facilities would be less than significant without mitigation.

***Threshold c) Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

(1) Project Impacts

As detailed in the discussions under Thresholds a) and b), the Project would comply with regulations regarding open space and recreational facilities. In addition, although the Project would introduce a residential population that would generate a demand for parks and recreational facilities, Project residents would be anticipated to utilize the Project's on-site open space and recreational facilities to a greater extent than off-site facilities. Therefore, the Project would not include or require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment. **Impacts to parks and recreational facilities would be less than significant.**

(2) Mitigation Measures

Project impacts with regard to parks and recreation would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Project impacts with regard to parks and recreation would be less than significant without mitigation.

## e) Cumulative Impacts

### (1) Impact Analysis

Development of the Project, in conjunction with the 12 related projects, could result in an increase in permanent residents living in the Project area. Additional cumulative development would contribute to lowering the existing parkland to population ratio. However, each of the related projects that contain a residential component is expected to comply with the payment of park mitigation fees, such as Quimby fees and the Dwelling Unit Construction Tax. Therefore, with payment of the applicable recreation fees on a project-by-project basis, along with the provision of on-site open space for the residential projects, the cumulative park impacts related to parks and recreational facilities would be reduced to a less-than-significant level.

### (2) Mitigation Measures

Cumulative impacts with regard to parks and recreation would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Cumulative impacts with regard to parks and recreation would be less than significant without mitigation.

# IV. Environmental Impact Analysis

# I. Public Services

# 5. Libraries

## 1. Introduction

The following section addresses the proposed Project's impacts upon the City of Los Angeles Public Library (LAPL) and the local libraries in the Project area. The purpose of this section is to determine whether existing public libraries and available library capacities serving the Project Site can accommodate the increase in residents and whether the increase in residents would result in the development or construction of new public libraries, which, in turn, would have the potential to generate environmental impacts. The LAPL was contacted and consulted for information on the local libraries serving the Project Site. The written correspondence letter is contained in Appendix I to this Draft EIR.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) Measure L

The LAPL budget ($150.7 million) is two percent of the total City budget ($6.7 billion).[34] In 2011, Measure L, the Public Library Funding Charter Amendment, was approved by over 63 percent of voters. Measure L provides funds to restore 6-day-a-week service at all 73 libraries, and eventually 7-day-a-week service at 9 libraries, purchase additional books, and increase access to the LAPL's collections, computers and programs including after-school/summer youth, student homework help, adult literacy, and job search programs.[35] Over the course of 4 years, (2011-2015), Measure L provided the LAPL with the money it needed to pay all these costs and restore library services.

[34] *Los Angeles Public Library, Measure L Fact Sheet, http://www.lapl.org/sites/default/files/media/pdf/about/fact_sheet.pdf, accessed September 2016.*

[35] *Ibid.*

### (2) Los Angeles Public Library Branch Facilities Plan

The Los Angeles Public Library Branch Facilities Plan was adopted by the Board of Library Commissioners in 1988 and revised in 2007. It consisted of two components – a Site Selection Guidelines that set standards for the size and features of branches based on location and the population served in each community, and a List of Projects, identifying the facility status and need of each existing branch library and identifying the need for branch libraries in communities without existing libraries.

The Facilities Plan established criteria for the size of libraries. The plan recommended building 10,500 square foot facilities for communities with less than 50,000 population and 12,500 square feet libraries for communities with more than 50,000 population.

On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 sf for a community with less than 45,000 population and 14,500 sf for a community with more than 45,000 population and up to 20,000 sf for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.

### (3) LAPL Strategic Plan 2015-2020

As a response to Measure L, the Los Angeles Public Library Strategic Plan 2015-2020 (Strategic Plan) was developed to identify specific goals and objectives that focus on community development and program expansion in an effort to increase the number of people who use the library services, to increase the number of library cardholders and actively promote the robustly market programs and services to increase residents' overall engagement with the libraries.[36]

## b) Existing Conditions

### (1) Regional Facilities

The Northeast Community Plan area is served by six public branches, one is of a regional scale, and the remaining five are community branches. Community libraries have a service radius of two miles and serve a population of 25,000 to 50,000; regional libraries serve populations of 300,000 to 350,000. In addition to LAPL facilities, the Northeast community is also served by the libraries at California State University at Los Angeles, Occidental College, and the University of Southern California Medical Center.

[36] *Los Angeles Public Library Strategic Plan 2015-2020, June 2015.*

### (2) Public Libraries Serving the Project Area

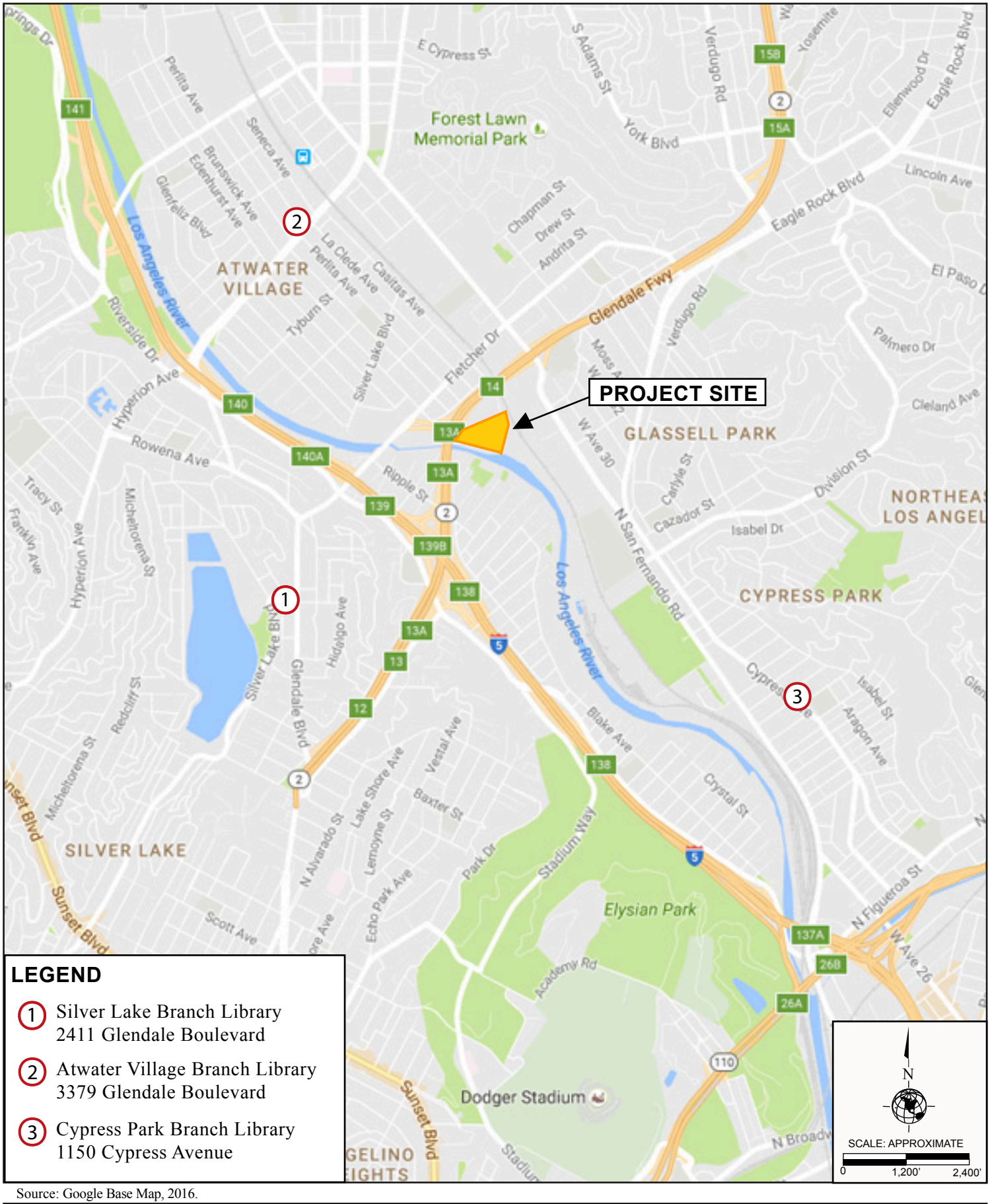
Within the City of Los Angeles, the LAPL provides library services at the Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through internet-based resources. Approximately 6.5 million books and other materials, 2,300 public computers, Adult Literacy Centers, online homework help, online job search guide and resources, and programs for children, teens, and adults are all provided in the LAPL. The LAPL branches currently serving the Project Site are shown in Table IV.I-15, Public Libraries Serving the Project Area, below and depicted in Figure IV.I-5. Public Library Location Map.

**Table IV.I-15**
**Library Facilities Serving the Project Area**

| Library Branch | Address | Specific Library Services [a] | Approx. Distance to Project Site (miles) |
|---|---|---|---|
| 1. Silver Lake Branch Library | 2411 Glendale Boulevard | Friends of the Library Group, meeting room rental | 1.0 |
| 2. Atwater Village Branch Library | 3379 Glendale Boulevard | Early learning for families area, Friends of the Library Group, meeting room rental | 1.0 |
| 3. Cypress Park Branch Library | 1150 Cypress Avenue | Early learning for families area, Friends of the Library Group, meeting room rental | 1.5 |

*Notes:*
[a] *All branches offer computer workstations, free public Wi-Fi, and wireless and mobile printing.*
*Source: City of Los Angeles Public Library, 2800 Casitas Avenue Project [ENV-2016-2862-EIR], Request for Information Los Angeles Public Library Response, September 10, 2018 (See Appendix I to this Draft EIR).*

The Silver Lake Branch Library, located at 2411 Glendale Boulevard, is located approximately one mile southwest of the Project Site. The Silver Lake Branch Library is approximately 13,670 square feet and carries 55,408 volumes in collection with a staff of 9.5 full-time employees. Based on the L.A. Times Mapping L.A. database and branch library community boundaries, the service population of the Silver Lake Branch Library is approximately 84,003 persons. As a result, the Silver Lake Branch Library currently does not meet the 2007 Branch Facilities Plan's recommended building size standards (i.e. 14,500 square feet for a service population over 45,000 persons).




Source: Google Base Map, 2016.

Figure IV.I-5
Public Library Location Map

The Atwater Village Branch Library, located at 3379 Glendale Boulevard, is located approximately one mile north of the Project Site. The Atwater Village Branch Library is approximately 5,900 square feet and carries 36,340 volumes in collection with a staff of 7.5 full-time employees. Based on the L.A. Times Mapping L.A. database and branch library community boundaries, the service population of the Atwater Village Branch Library is approximately 14,860 persons. As a result, the Atwater Village Branch Library currently does not meet the 2007 Branch Facilities Plan's recommended building size standards (i.e. 12,500 square feet for a service population below 45,000 persons).

The Cypress Park Branch Library, located at 1150 Cypress Avenue, is located approximately 1.5 miles southeast of the Project Site. The Cypress Park Branch Library is approximately 10,750 square feet and carries 30,571 volumes in collection with a staff of 9.5 full-time employees. Based on the L.A. Times Mapping L.A. database and branch library community boundaries, the service population of the Silver Lake Branch Library is approximately 8,952 persons. As a result, the Cypress Park Branch Library currently does not meet the 2007 Branch Facilities Plan's recommended building size standards (i.e. 12,500 square feet for a service population below 45,000 persons).

# 3. Environmental Impacts

## a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to libraries if it would:

***Threshold a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for libraries.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide (Thresholds Guide) identifies the following criteria to evaluate libraries:

a) The net population increase resulting from the Project;

b) The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable,

scheduled improvements to library services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and

c) Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities, land dedication, or direct financial support to the Los Angeles Public Library).

## b) Methodology

The proposed Project's environmental impacts upon library services are determined based on the population of the service areas for the existing libraries serving the project area and the ability of the libraries serving the Project area to continue to serve the Project area population based on the anticipated number of library patrons and residents that the proposed Project is anticipated to generate upon buildout. Based on these factors, it is determined whether the proposed Project would exceed the capacity of any existing or proposed libraries such that a new or expanded library or libraries would be needed.

## c) Project Design Features

No specific project design features are proposed with regard to libraries.

## d) Analysis of Project Impacts

***Threshold a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for libraries?***

### (1) Project Impacts

Development of the proposed Project would include the construction of 419 residential dwelling units and 64,000 square feet of commercial space. It is estimated that the development of the proposed Project would result in an increase of up to 1,090 new residents[37] to the Northeast Los Angeles Community Plan area and would, therefore, create an additional potential demand on the three local library facilities within a 2-mile radius. As mentioned previously, all three local libraries do not meet the recommended building size standards for the associated service population. With the addition of 1,090 new residents, the service population of the closest library, Silver Lake Branch Library,

[37] *Based on an average of 2.6 persons per household. See Section IV.H, Population, Housing and Employment.*

would be 85,093 persons. When viewed together, the three libraries provide a total of 30,320 square feet of available library space for a total service population of 108,905 persons, including the 1,090 new residents from the proposed Project. Although all three local libraries do not meet the recommended building size standards, all three libraries are sufficient when considered together, since there are three libraries within a 2-mile radius.

Currently, there are no plans to construct any new library facilities in the local area.[38] As such, the Project would not result in substantial adverse physical impacts associated with the construction or expansion of any library facilities. As stated in the 2015-2020 Strategic Plan, LAPL is committed to increasing the number of people who use library services and the number of library cardholders. ***Therefore, the proposed Project's impacts upon library services would be less than significant.***

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Significance after Mitigation

Project impacts to library services would be less than significant without mitigation.

## e) Cumulative Impacts

### (1) Impact Analysis

The proposed Project would not be expected to increase demand of library services within the City of Glendale. The five related projects within the City of Glendale would have the potential to use City of Glendale public libraries. As such, there would be no potential for cumulative impacts to occur with regard to library facilities within the City of Glendale.

Development of the proposed Project, in conjunction with the eight related projects in the City of Los Angeles, could result in an increase in permanent residents residing in the Project area, which would likely generate additional demands upon library services. The proposed Project and eight of the related projects are located within the City of Los Angeles, and residents of these projects would have the potential to use LAPL facilities. It is estimated that of the eight related projects, five related projects (Related Project No. 2, 4, 6, 10, and 11) propose residential dwelling units that would directly increase the population by approximately 2,294 residents. When combined with the proposed Project's 1,090 new residents, the proposed Project and related projects would add a total of 3,384 persons to the three libraries within a 2-mile radius. Pursuant to the library sizing

[38] *See Los Angeles Public Library Correspondence re: 2800 Casitas Avenue Project [ENV-2016-2862-EIR], dated September 19, 2018.*

standards recommended in the 2007 Branch Facilities Plan, the cumulative future service population would increase to 111,199 persons for the three local libraries (a total of 30,320 square feet). Since each library does not meet the building size standards for their associated service population, the increase in resident population by the proposed Project and related projects would have the potential to increase demand of each City's library services.

To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the LAPL and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Additionally, similar to the proposed Project, each related project would generate tax revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing library services in the Community Plan area, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for library services as a result of the Project and the related projects. If LAPL determines that new facilities are necessary at some point in the future, it is reasonably anticipated that such facilities would occur where allowed under the designated land use, would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and would qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts. At the present time, however, the LAPL has confirmed that there are no plans to develop new branch facilities in the project area.[39] ***Therefore, the proposed Project's contribution to the cumulative impacts on libraries would not be cumulatively considerable, and impacts would be less than significant.***

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Significance after Mitigation

Cumulative impacts to library services would be less than significant prior to mitigation.

[39] *See Los Angeles Public Library Correspondence re: 2800 Casitas Avenue Project [ENV-2016-2862-EIR], dated September 19, 2018.*

# IV. Environmental Impact Analysis

# J.1 Utilities and Service Systems -- Water

## 1. Introduction

The following section analyzes the proposed Project's water infrastructure and the associated demands the proposed Project would place upon regional water supplies that serve the Project area. Specifically, this Section quantifies the anticipated operational water demand for the proposed development and identifies applicable water efficient strategies that are required by California State Water Code, the California Building Code (CBC), the California Green Building Code (CALGreen), the City of Los Angeles Green Building Code, and the City of Los Angeles Department of Water and Power's (LADWP's) 2015 Urban Water Management Plan (UWMP). The 2015 UWMP is incorporated by reference and is available for review through LADWP's website, at *www.ladwp.com*. The data and information regarding water infrastructure is based in part on the information provided by the City of Los Angeles Department of Water and Power[1] and the Utility Infrastructure Report provided in Appendix P to this EIR.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) Federal

The principal federal agency involved in drinking water regulation is the U.S. Environmental Protection Agency (USEPA). The USEPA is responsible for implementing federal drinking water law, setting national drinking water requirements, and overseeing the state's enforcement of the federal law.

*(a) Clean Water Act*

The Federal Clean Water Act (CWA)[2] establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality

[1] *City of Los Angeles, Department of Water and Power, Response to Request for Water and Electric Connection Services, February 7, 2017 (see Appendix I to this EIR).*

[2] *33 U.S.C. §1251 et seq. (1972)*

standards for surface waters. Under the CWA, the USEPA has implemented pollution control programs such as setting wastewater standards for industry. The CWA is enforced through the USEPA's National Pollutant Discharge Elimination System (NPDES) permit program.

*(b) Safe Drinking Water Act*

The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The SDWA was amended in 1986 and 1996 authorizes the USEPA to set national health-based standards for drinking water to protect against both naturally-occurring and man-made contaminants that may be found in drinking water. These National Primary Drinking Water Regulations (codified in 40 CFR Part 20) set enforceable maximum contaminant levels for particular contaminants in drinking water, established monitoring regulations, and established acceptable treatment techniques to remove contaminants. The most direct oversight of water systems is conducted by state drinking water programs, which have the opportunity to set and enforce their own drinking water standards if the standards are at a minimum as stringent as EPA's national standards.

## (2) State

Until July 2014, the regulation of drinking water was primarily the responsibility of the California Department of Public Health (CDPH). This responsibility has now been transferred to the State Water Resources Control Board (State Water Board). The State Water Board, as the federally designated primacy agency for the drinking water program in California, is responsible for the implementation of the federal SDWA and has overall responsibility for implementation of the California SDWA as defined in the California Health and Safety Code and Titles 17 and 22, California Code of Regulations (CCR). The Division of Drinking Water (DDW) within the State Water Board carries out the drinking water regulatory responsibilities.

*(a) Health and Safety Code*

*(i) Safe Drinking Water Act*

California enacted its own SDWA in 1976 to improve upon the minimum requirements of the federal SDWA, to establish primary drinking water standards that are at least as stringent as those established under the federal Safe Drinking Water Act, and to establish a program that is more protective of public health than the minimum federal requirements. The CSDWA establishes a drinking water regulatory program within the State Water Board to provide for the orderly and efficient delivery of safe drinking water within the state. The CSDWA requires the State Water Board to submit to the Legislature a comprehensive Safe Drinking Water Plan for California every five years.

*(b) California Code of Regulations*

The California Code of Regulations (CCR), is the official compilation and publication of regulations that have been adopted, amended or repealed by state agencies. The following provisions of the CCR pertain to water regulations.

*(i) Title 20*

Title 20, Chapter 4, Article 4, Section 1605.3 establishes water efficiency standards (i.e., maximum flow rates, maximum gallons per flush) for all new plumbing fittings and fixtures (e.g., showerheads, sink faucets, water closets, urinals). Among the standards, the maximum flow rate for showerheads and lavatory faucets manufactured after July 1, 2018 are 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi) with an optional temporary flow of 2.2 gpm at 60 psi for kitchen faucets and aerators. The standard for public lavatory faucets and aerators is 0.5 gpm at 60 psi. The standard for water closets and urinals is 1.28 gallons per flush. In addition, Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

*(ii) Title 24, Part 11*

Part 11 of Title 24 establishes the California Green Building Standards Code (CALGreen). The purpose of CALGreen is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CALGreen includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

*(c) Urban Water Management Planning Act*

The State of California's Urban Water Management Planning Act[3] requires all public water suppliers that provide municipal and industrial water to more than 3,000 customers or supply more than 3,000 acre feet per year (AFY) of water to prepare an Urban Water Management Plan (UWMP) to assess the reliability of its water sources over a 25-year planning horizon and report its progress on achieving a 20 percent reduction in per-capita urban water consumption by the year 2020 (as required in the Water Conservation Act of 2009 [SB X7-7]). The UWMP must be prepared every 5 years and submitted to the

[3] *California Water Code, Sections 10610-10656.*

California Department of Water Resources (DWR). In June 2016, the City of Los Angeles adopted and updated the UWMP (further discussed below).

*(d) Senate Bill 610 and Senate Bill 221 - Water Supply Assessments*

Senate Bills SB 610 and SB 221 became effective January 1, 2002, amending Sections10910-10915 of the State Water Code, by requiring that counties and cities consider the availability of adequate water supplies for certain new large development projects and obtain written verification of sufficient water supply from the local water supplier to serve proposed large development projects in their jurisdiction. Pursuant to SB 610, projects that are required to obtain Water Supply Assessments include the following:

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons;
- a proposed commercial office building of more than 250,000 square feet of floor space or employing more than 1,000 persons;
- a proposed hotel or motel of more than 500 rooms;
- a proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- a mixed-use project that falls in one or more of the above-identified categories; or
- a project not falling in one of the above-identified categories but that would demand water equal or greater than the amount required by a 500-dwelling unit project.

The proposed Project does not meet any of the above criteria and, therefore, is not subject to a water supply assessment.[4]

### (3) Regional

As discussed in detail below, the Metropolitan Water District of Southern California (MWD) is a primary source of water supply within Southern California. Based on the

[4] *Based on the California Department of Water Resources' Guidebook for Implementation of SB 610 and SB 221, in determining whether a project would demand an amount of water equivalent to, or greater than the amount of water required by a 500 dwelling unit project, it is generally acknowledged that one acre foot can serve two to three households on an annual basis; therefore one dwelling unit typically consumes 0.3 to 0.5 acre-feet of water per year. Thus, based on this information the water demand of a 500 dwelling unit project would be between 150 and 250 acre feet per year.*

water supply planning requirements imposed on its member agencies and ultimate customers, MWD has adopted a series of official reports on the state of its water supplies. As described in further detail below, in response to recent developments in the Sacramento Delta, the MWD has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies.

*(a) MWD's Integrated Water Resources Plan*

The Integrated Water Resources Plan (IRP) is the long-term water resources strategy for the MWD in Southern California. As it was first adopted in 1996, the goal of the IRP has been to ensure that a reliable water system will extend into the future. The 2015 IRP Update, adopted in January 2016, provides MWD's strategy for water resource reliability through the year 2040 and establishes targets for a diversified portfolio of water supply investments. The 2015 IRP Update calls for stabilizing and maintaining imported water supplies; meeting future growth through increased water conservation and sustaining and developing new local supplies; pursuing a comprehensive transfers and exchanges strategy; building storage in wet and normal years to manage risks and drought; and preparing for uncertainty with Future Supply Actions. Overall, the strategies presented in the 2015 IRP Update include investments to maintain the reliability of imported water supplies, expansion of local water supplies and reduction in water demand through a variety of conservation and water use efficiency initiatives.[5]

*(b) MWD's 2015 Urban Water Management Plan*

MWD's 2015 Urban Water Management Plan (UWMP) addresses the future of MWD's water supplies and demand through the year 2040.[6] Based on its 2015 UWMP, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under single dry-year and multiple dry-year hydrologic conditions. MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. In addition,

[5] *Metropolitan Water District of Southern California, Integrated Water Resources Plan 2015 Update, January 2016.*

[6] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

MWD has plans for supply implementation and continued development of a diversified resource mix including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs. As set forth in their 2015 UWMP, MWD will also continue investments in water use efficiency measures to help the region achieve the 20 percent per person potable water use reduction by 2020.

*(c) MWD's Water Surplus and Drought Management Plan*

In 1999, MWD incorporated the water shortage contingency analysis that is required as part of any urban water management plan into a separate, more detailed plan, called the Water Surplus and Drought Management Plan. The overall objective of the Water Surplus and Drought Management Plan is to ensure that shortage allocation of MWD's imported water supplies is not required.[7] The Water Surplus and Drought Management Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The Water Surplus and Drought Management Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The Water Surplus and Drought Management Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside and then outside of the region. The Shortage Actions of the Water Surplus and Drought Management Plan are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as a part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.

*(d) MWD's Water Supply Allocation Plan*

While the Water Surplus and Drought Management Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, MWD adopted a water supply plan called the Water Supply Allocation Plan in February 2008, that has since been implemented three times, most recently in April 2015.[8] The Water Supply Allocation Plan includes a formula for determining reductions of water deliveries to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen cuts in water supplies). The formula allocates shortages of MWD supplies and seeks to balance the impacts of a shortage at the retail level while maintaining equity on the wholesale level, and takes into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-

[7] *Metropolitan Water District of Southern California, Water Surplus and Drought Management Plan: Report No. 1150, August 1999.*

[8] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

potable recycled water use and the implementation of conservation savings programs. The allocation period covers 12 months from July of a given year through the following June.

### (4) Local

#### *(a) LADWP - 2015 Urban Water Management Plan*

The California Urban Water Management Planning Act (first effective on January 1, 1984) requires every urban water supplier prepare and adopt an UWMP every five years. The main goal of an UWMP is to forecast future water demands and water supplies under average and dry year conditions, identify future water supply projects such as recycled water, provide a summary of water conservation best management practices (BMPs), and provide a single and multi-dry year management strategy.[9]

In June 2016, the City of Los Angeles updated and adopted the 2015 Urban Water Management Plan (UWMP). The 2015 UWMP is consistent with the City's goals and policy objectives for reliable water supply; such as, the Mayor's Executive Directive No. 5 (ED5) and the Sustainable City pLAn (pLAn), which are both further discussed in the Local Regulations subsection, below. LADWP's 2015 UWMP serves two purposes: (1) it is a master plan for water supply and resources management consistent with the City's goals and policy objectives; and (2) it provides full compliance with requirements of California's Urban Water Management Planning Act.[10] The main objective of producing these plans is to confirm that cities are performing the advance planning necessary to provide reliable water service in the future. Specifically, the 2015 UWMP forecasts future water demands and water supplies under average and dry year conditions; identifies future water supply projects, such as recycled water; provides a summary of water conservation BMPs; and provides a single and multi-dry year management strategy.

A number of important changes have occurred since LADWP prepared its 2010 UWMP:

- The year 2012 marked the start of the current multi-year drought resulting in Governor Brown proclaiming a drought state of emergency in 2014.
- In August 2012, LADWP established a set of guiding principles to secure the long-term vision of water supply reliability and cost effectiveness for LADWP customers.
- In July 2014, the State Water Resources Control Board implemented its emergency water conservation regulation (Emergency Regulation) as directed by Governor Brown to take actions to reduce water use by 20 percent statewide.

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[9] *City of Los Angeles, Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, 2016, at page 1.*

[10] *City of Los Angeles, Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, 2016 at page 2.*

- In October 2014, Mayor Eric Garcetti issued ED5 (Emergency Drought Response), which set goals to reduce per capita water use, reduce purchases of imported potable water by 50 percent, and create an integrated water strategy to increase local supplies and improve water security in the context of climate change and seismic vulnerability.
- In March 2015, the Emergency Regulation was expanded requiring urban water supplies to implement their water shortage contingency plants to a level equivalent to a 20-percent water use reduction.
- In April 2015, the pLAn was released establishing short-term and long-term targets for the City over the next 20 years in 14 categories to strengthen and promote sustainability of the environment, economy, and equity in Los Angeles. A multi-faceted approach to developing a locally sustainable water supply was developed through the pLAn calling for short-term, mid-term, and long-term goals reducing reliance on imported water, reducing per capita water use through conservation, and increasing local water supply availability.
- In May 2015, as the drought worsened, the Emergency Regulation was further amended to mandate conservation targets for urban water suppliers to achieve a mandatory 25-percent water use reduction statewide from June 2015 through February 2016.
- In February 2016, the requirement of the May 2015 Emergency Regulation amendment extended to October 2016 with adjustments to account for climate affecting different parts of the state, growth experienced by urban areas, and significant investments that have been made to create new, local, drought-resilient sources of potable water supply.[11]

Multiple new requirements have been added to the UWMP Act since completion of the 2010 UWMP, including:

- A requirement for a narrative description of water demand measures implemented over the past five years and future measures planned to meet 20-percent demand reduction targets by 2020;
- Implementation of a standard methodology for calculating system water loss;
- Mandatory electronic filing of UWMPs;
- Voluntary reporting of passive conservation savings, energy intensity, and climate change; and
- Requirement to analyze and define water features that are artificially supplied with water.

[11] *City of Los Angeles, Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, 2016 at page 2.*

Faced with increasing demands for additional water supplies and drought conditions, LADWP and other water agencies in Southern California are addressing the challenge of providing a reliable water supply to a growing population. A multi-year drought has precipitated several sustainability initiatives at the state level and within the City. These actions include calls to decrease water use by up to 25 percent per capita over the next 20 years, reduce dependence on imported water supplies, and accelerate the development of local supplies. Plans outlined herein are not only designed to ensure future water reliability for Los Angeles but also comply with these sustainability policies and initiatives.

LADWP plans to address current and future drought conditions and the relevant state and City initiatives with the following responses:

- Achieving significant advances in water conservation, stormwater capture, and water recycling to increase supply reliability, reduce imported water purchases, and increase locally produced water.
- Remediating the contamination of the San Fernando Groundwater Basin.
- Ensuring continued reliability of the water supplies from the Metropolitan Water District of Southern California (MWD) through active representation on the MWD Board.
- Maintaining operational integrity of the Los Angeles Aqueduct and the City's water distribution systems.
- Meeting or exceeding all federal and state standards for drinking water quality.

*(b) Los Angeles Municipal Code*

The City of Los Angeles has adopted several regulations and ordinances in the LAMC in an effort to reduce water consumption within the City of Los Angeles. Chapter XII of the LAMC establishes the Water Conservation Plan for the City of Los Angeles, and Chapter IX, Building Regulations, Article 9 (2017 Green Building Code), as amended, establishes water reduction measures to reduce the City's water consumption in residential and non-residential development.

The City has adopted several ordinances, later codified in the Los Angeles Municipal Code (LAMC), in an effort to reduce water consumption. A summary of the City's key regulations regarding water conservation is provided below.

Ordinance Nos. 166,080, 181,288, 183,608, and 184,250—amending LAMC Chapter XII, Article 1 to clarify prohibited uses of water and modify certain water conservation requirements of the City's Emergency Water Conservation Plan. The City's Emergency Water Conservation Plan sets forth six different phases of water conservation, which shall be implemented based on water conditions. As part of these requirements, watering is

limited to specific days and hours. In determining which phase of water conservation shall be implemented, LADWP monitors and evaluates the projected water supply and demand. In addition, the Emergency Water Conservation Plan includes penalties for those who violate its requirements.

City Ordinance No. 180,822—amended LAMC Chapter XII, Article 5 to establish water efficiency requirements for new development and renovation of existing buildings, and mandate installation of high efficiency plumbing fixtures in residential and commercial buildings.

City Ordinance No. 181,480—amended LAMC Chapter IX by adding Article 9 (Green Building Code) to the LAMC to incorporate various provisions of the California Green Building Standards Code. This ordinance added mandatory measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20 percent by: (1) using water saving fixtures or flow restrictions; and/or (2) demonstrating a 20-percent reduction in baseline water use.

City Ordinance Nos. 181,899 and 183,833—amended LAMC Chapter VI, Article 4.4, Section 64.72 regarding stormwater and urban runoff to include new requirements, including Low Impact Development (LID) requirements that promote water conservation.

Ordinance No. 182,849—amended LAMC Chapter IX, Article 9 (Green Building Code) to mandate that for new water service or for additions or alterations requiring upgraded water service for landscaped areas of at least 1,000 square feet, separate sub-meters or metering devices shall be installed for outdoor potable water use. This ordinance also required that for new non-residential construction with at least 1,000 square feet of cumulative landscaped area, weather- or soil moisture–based irrigation controllers and sensors be installed.

City Ordinance No. 184,692—amended LAMC Chapter IX, Article 4 (Plumbing Code) by adopting by reference various sections of the California Plumbing Code. This ordinance also added requirements for plumbing fixtures and fixture fitting.

Ordinance No. 184,248—amended LAMC Chapter IX, Article 4 (Plumbing Code) and Article 9 (Green Building Code) to establish citywide water efficiency standards and mandate a number of new fixture requirements and methods of construction for plumbing and irrigation systems.

Ordinance No. 184,130 – Water Rate Ordinance. The City's Water Rate Ordinance was adopted in June 1995 and last amended in April 2016. This Ordinance restructured water rates to help further promote conservation while recovering the higher costs of providing water to high volume users and accelerating development of sustainable local water supply.

In addition to the above requirements, the City has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing. As set forth in LAMC Section 57.507.3.1, Industrial and Commercial land uses (which the LAFD has classified the Project as) have a minimum required fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 psi unless otherwise determined by LAFD. LAMC Section 57.507.3.2 also addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

*(c) Executive Directive No. 5 (ED5)*

In response to the ongoing extreme drought conditions that started in 2012, on October 14, 2014, City of Los Angeles Mayor Eric Garcetti issued Executive Directive No. 5 (ED5), which addresses the importance of reducing the City's reliance on imported water. ED5 discussed achieving the following goals through actions by general funds departments, proprietary departments, and residents: [12]

- A reduction in per capita potable water use by 20 percent by 2017.
- A reduction in LADWP's purchase of imported potable water by 50 percent by 2024.
- The creation of an integrated water strategy that increases local water supplies and that improves water security in the context of climate change and seismic vulnerability.

*(d) Sustainable City pLAn*

The Sustainable City pLAn (pLAn), first adopted in 2015[13], established short-term and long-term sustainability targets for the City over the next 20 years in 14 categories to

[12] *City of Los Angeles, Mayor Eric Garcetti, Executive Directive No. 5, October 14, 2014.*
[13] *Mayor's Office of Sustainability, Sustainable City pLAn, April 2015.*

strengthen and promote sustainability of the environment, economy, and equity in Los Angeles. Water use in the City falls within the category of local water, which is within the environmental framework, and lead by example directive. A multi-faceted approach to developing a locally sustainable water supply was developed through the pLAn. The pLAn incorporates the targets established in ED5 to reduce per capita potable water use by 20 percent by 2017 and further builds upon those targets to reduce per capita potable water use by 22.5 percent by 2025, and by 25 percent by 2035 by Fiscal Year 2013–2014 levels. The pLAn also includes a reduction in imported water purchases from MWD by 50 percent of the total supply by 2025 and a goal to expand local sources of water to 50 percent of the total water supply by 2035. Specific strategies and desired outcomes for conservation, recycled water, and stormwater capture are included in the pLAn. These include investments in state-of-the art technology, rebates and incentives promoting water-efficient appliances, tiered water pricing, a technical assistance program for business and industry, and large landscaped irrigation and efficiency programs.

In April 2016, the Sustainable City pLAn's First Annual Report for 2015–2016 was released. It was reported that the City had reduced water use by 19 percent to nearly achieve the 20 percent water reduction goal, and that rebates for water efficient appliances have contributed to conservation.[14] As discussed above, as of February 2017, the City has met its 20 percent water reduction target, which also meets the Sustainable City pLAn's goal. As the Sustainable City pLAn's Second Annual Report for 2016–2017 was released in March 2017, the City has begun working toward its next goal of reducing municipal water use by 22.5 percent by 2025.

*(e) One Water LA 2040 Plan*

The One Water LA 2040 Plan (Plan) provides a holistic and collaborative approach to addressing all of the City's water resources from surface water, groundwater, potable water, wastewater, recycled water, dry weather runoff, and stormwater as "One Water." The Plan represents the City's continued and improved commitment to proactively manage all its water resources and implement innovative solutions, driven by the Sustainable City pLAn. The Plan will help guide strategic decisions for integrated water projects, programs, and policies within the City. One Water LA objectives include the following[15]:

[14] *Mayor's Office of Sustainability, Sustainable City pLAn, First Annual Report for 2015–2016, April 2016.*

[15] *City of Los Angeles Department of Water and Power, One Water LA 2040 Plan, 2018.*

1. Integrate management of water resources and policies by increasing coordination and cooperation between all City departments, partners and stakeholders.

2. Balance environmental, economic and societal goals by implementing affordable and equitable projects and programs that provide multiple benefits to all communities.

3. Improve health of local watersheds by reducing impervious cover, restoring ecosystems, decreasing pollutants in our waterways and mitigating local flood impacts.

4. Improve local water supply reliability by increasing capture of stormwater, conserving potable water and expanding water reuse.

5. Implement, monitor, and maintain a reliable wastewater system that safely conveys, treats and reuses wastewater while also reducing sewer overflows and odors.

6. Increase climate resilience by planning for climate change mitigation and adaptation strategies in all City actions.

7. Increase community awareness and advocacy for sustainable water by active engagement, public outreach, and education.

## b) Existing Conditions

### (1) Regional Water Supplies

LADWP currently supplies water to the Project Site. LADWP is responsible for ensuring that water demands within the City are met and that state and federal water quality standards are achieved. Primary sources of water supplies for the City include the Los Angeles Aqueducts (LAA), local groundwater, purchased water from MWD, and recycled water. The amount of water obtained from these sources varies from year to year and is primarily dependent on weather conditions and demand. In addition, reclamation of wastewater is utilized for certain irrigation purposes. Figure IV.J-1, Main Sources of LADWP's Water Supply, illustrates the sources of water supply that provide potable water to the LADWP service area, including the City of Los Angeles.

From the early construction of the LAA in the early 1900s, the LAA have historically provided the vast majority of water for the City. Annual LAA deliveries are dependent on snowfall in the eastern Sierra Nevada. Beginning in 2012, a multiple-year drought impacted the entire State of California, and LAA deliveries reached a new record low of 53,300 AF during fiscal year 2014-2015. In the last decade, environmental considerations

Source: Los Angeles Department of Water and Power, 2015 Urban Water Management Plan.

Figure IV.J-1
Main Sources of LADWP's Water Supply

have required that the City reallocate approximately 182,000 AFY of LAA water supply to environmental mitigation and enhancement projects, leaving approximately 43 percent of the supply available for export to the City. Reducing water deliveries to the City from the LAA to comply with environmental enhancement efforts coupled with the drought has led to increased dependence on imported water supply from MWD. This dependence on imported purchased water has reinforced LADWP's plans to focus on developing local supplies. Because deliveries from MWD and LAA have declined during the drought, local groundwater resources have become increasingly important to the City of Los Angeles. Between 2010 and 2015 local groundwater has provided approximately 12 percent of the total water to the City.[16] In recent years, contamination issues have impacted LADWP's ability to fully utilize its local groundwater entitlements. Furthermore, declining groundwater levels and overdraft conditions have become additional concerns for the Los Angeles basins. Aging wellfields and distribution system infrastructure have also presented challenges to the development and use of the City's local groundwater resources. In response to these issues, LADWP has renewed its focus on sustainable management of its local groundwater basins. Responding to groundwater contamination issues has been a high priority of the City. Expanded basin remediation systems are under development in the City's main groundwater basin, the San Fernando Basin (SFB), to remove contamination from the local groundwater basin for the betterment of the environment and to restore the beneficial uses of this important basin. LADWP continues to invest in stormwater recharge projects to restore local groundwater basin levels by enhancing and enlarging existing stormwater capture facilities. LADWP is making investments in advanced treatment systems in the SFB to produce purified recycled water for groundwater replenishment and indirect potable reuse. Together, these multiple investments will help augment the City's groundwater and ensure basin water levels remain sustainable for many decades into the future.

MWD is the largest water wholesaler for domestic and municipal uses in California and provides water to nearly 19 million people with an average of 1.7 billion gallons of water per day. MWD imports a portion of its water supplies from Northern California through the State Water Project's (SWP) California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct. The City of Los Angeles purchases water from MWD to supplement its supplies from local groundwater, LAA deliveries, and recycled water. Historically, LADWP has purchased MWD water to make up the difference between demand and City supplies. The City of Los Angeles relies more heavily on MWD water during drier years. As a percentage of the City's total yearly water supply, MWD

16 *City of Los Angeles, Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, 2016, at page ES-5.*

water has historically accounted for a range from 4 percent in fiscal year 1983-84 to 75 percent in fiscal year 2013-2014.[17]

Water storage is essential for LADWP to supply water during high demand conditions and provide for firefighting and emergencies. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 110 storage tanks and reservoirs within the City, and eight storage reservoirs along the LAA. The tanks and reservoirs range in size from 10,000 to 60 billion gallons with a total capacity of 109 billion gallons.[18] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout LADWP's Water Service Area.[19]

*(a) Water Demand Forecast*

Demographic data from the Southern California Association of Governments' (SCAG's) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as well as billing data for each major customer class, weather, conservation, price of water, personal income, family size, economy, and drought conservation effect, were factors used in forecasting future water demand growth. Table IV.J-1 summarizes the demographic projections for the LADWP service area. Service area population is expected to continue to grow over the next 25 years at a rate of 0.5 percent annually.

**Table IV.J-1**
**Demographic Projections for the LADWP Service Area**

| Demographic | 2020 | 2025 | 2030 | 2035 | 2040 |
|---|---|---|---|---|---|
| **Population** | 4,026,891 | 4,168,131 | 4,210,042 | 4,351,408 | 4,441,545 |
| **Housing** | | | | | |
| Single-Family | 650,746 | 635,348 | 652,379 | 675,540 | 682,412 |
| Multi-Family | 828,744 | 900,523 | 940,549 | 973,978 | 1,031,239 |
| Total Housing | 1,479,490 | 1,535,871 | 1,592,928 | 1,649,518 | 1,713,651 |
| Persons per Household | 2.66 | 2.66 | 2.59 | 2.58 | 2.54 |
| **Employment** | | | | | |
| Commercial | 1,704,864 | 1,749,994 | 1,778,566 | 1,807,774 | 1,869,383 |
| Industrial | 136,023 | 135,594 | 134,061 | 131,686 | 131,285 |
| Total Employment | 1,840,887 | 1,885,588 | 1,922,628 | 1,939,460 | 2,000,667 |

*Source: 2015 Urban Water Management Plan; data taken from SCAG Regional Transportation Plan (2012), modified to represent LADWP's service area.*

[17] *City of Los Angeles, Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, 2016.*
[18] *City of Los Angeles, LA CEQA Thresholds Guide, 2006.*
[19] *City of Los Angeles, Los Angeles Department of Water and Power, Water for Los Angeles, 2012.*

The UWMP is updated every five years as required by California law. This process entails, among other requirements, an update of water supply and water demand projections for water agencies. The 2015 UWMP projects yearly water demand to reach 675,685 AF by year 2040 with passive water conservation including codes, ordinances, and conservation phases for each of the major categories of demand. As shown in Table IV.J-2, below, water demand projections in five-year increments through 2040 are available in the UWMP for each of the major customer classes (single family, multi-family, commercial/ governmental, and industrial). The targeted water demands based on the water use reduction goals established in the Sustainable City pLAn are also listed. Adding LADWP's planned recycled water supply to the pLAn's potable water demand targets yields an overall target for total water demands.

The UWMP used a modified unit approach to develop its service area-wide water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the growth in water use for the entire service area was considered in developing long-term water projections for the City through the year 2040.

LADWP is developing a path towards sustainability as outlined in ED5 and the pLAn by accelerating investments in conservation, water recycling, stormwater capture, and local groundwater development and remediation. The City plans to meet all future increases in water demand through a combination of local water supply development.

**Table IV.J-2**
**Water Demand Forecast for LADWP Service Area**

| Fiscal Year Ending | Water Demands by Sector (Acre-Feet) | | | | | | |
|---|---|---|---|---|---|---|---|
| | Single-Family | Multi-Family | Commercial/ Government | Industrial | Non-Revenue | Total | pLAn Target Use [a] |
| 2020 | 222,958 | 184,679 | 148,600 | 18,869 | 36,709 | 611,815 | 485,600 |
| 2025 | 224,729 | 206,065 | 155,994 | 19,235 | 38,682 | 644,706 | 533,000 |
| 2030 | 226,770 | 211,454 | 156,788 | 18,701 | 39,173 | 652,886 | 540,100 |
| 2035 | 231,776 | 216,071 | 156,186 | 18,104 | 39,711 | 661,848 | 551,100 |
| 2040 | 231,767 | 225,994 | 159,554 | 17,829 | 40,541 | 675,685 | 565,600 |

[a] *Targeted water demands set forth in the Mayor's Sustainable City pLAn.*
*Source: 2015 Urban Water Management Plan, 2016.*

*(b) Supply Reliability Assessment*

To demonstrate LADWP's water supply reliability, Table IV.J-3 summarizes the water demands and supplies for single dry year conditions through FY 2039-2040, which represents the City's planned supply portfolio to meet projected water demands under the most critical hydrologic conditions. Table IV.J-4 summarizes the water demands and supplies for average year conditions, which has the highest probability of occurring.

**Table IV.J-3**
**Service Area Reliability Assessment for Single Dry Year**

| Demand and Supply Projections (AF) | Single Dry Year (FY 2014-2015) | | | | |
|---|---|---|---|---|---|
| | 2020 | 2025 | 2030 | 2035 | 2040 |
| **Total Water Demand** [a] | **642,400** | **676,900** | **685,500** | **694,900** | **709,500** |
| **pLAn Water Demand Target** | **485,600** | **533,000** | **540,100** | **551,100** | **565,600** |
| **Existing/Planned Supplies** | | | | | |
| Conservation (Additional Active[b] and Passive[c] after FY 14/15 | 156,700 | 143,700 | 145,100 | 143,500 | 143,500 |
| Los Angeles Aqueduct [d] | 32,200 | 51,900 | 51,400 | 51,000 | 50,600 |
| Groundwater [e] (Net) | 112,670 | 110,670 | 106,670 | 114,670 | 114,070 |
| Recycled Water | | | | | |
| -Irrigation and Industrial Use | 19,800 | 29,000 | 39,000 | 42,200 | 45,400 |
| -Groundwater Replenishment | 0 | 30,000 | 30,000 | 30,000 | 30,000 |
| Stormwater Capture | | | | | |
| -Stormwater Reuse (Harvesting) | 100 | 200 | 300 | 300 | 400 |
| -Stormwater Recharge (Increased Pumping) | 2,000 | 4,000 | 8,000 | 15,000 | 15,000 |
| **Subtotal** | 323,470 | 369,470 | 380,470 | 396,670 | 398,970 |
| **MWD Water Purchases** | | | | | |
| With Existing/Planned Supplies | 318,930 | 307,430 | 305,030 | 298,230 | 310,530 |
| **Total Supplies** | **642,400** | **676,900** | **685,500** | **694,900** | **709,500** |
| **Potential Supplies** | | | | | |
| Water Transfers [f] | 40,000 | 40,000 | 40,000 | 40,000 | 40,000 |
| Subtotal | 40,000 | 40,000 | 40,000 | 40,000 | 40,000 |
| **MWD Water Purchases** | | | | | |
| With Existing/Planned/Potential Supplies | 278,930 | 267,430 | 265,030 | 258,230 | 270,530 |
| **Total Supplies** | **642,400** | **676,900** | **685,500** | **694,900** | **709,500** |

[a] *Total Demand with existing passive conservation.*
[b] *Cumulative hardware savings since late 1980s reached 188,034 AFY by 2014-15.*
[c] *Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAn.*
[d] *LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles supply is estimated to decrease 0.1652% per year due to climate change impact.*
[e] *Net groundwater excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.*
[f] *Potential water transfer occurs in dry years with stored water acquired in average and wet years.*

*Source: LADWP, 2015 Urban Water Management Plan.*

## Table IV.J-4
## Service Area Reliability Assessment for Average Weather Year

| Demand and Supply Projections (AF) | Average Weather Conditions (FY 1961-1962 to 2010-2011) | | | | |
|---|---|---|---|---|---|
| | 2020 | 2025 | 2030 | 2035 | 2040 |
| **Total Water Demand** [a] | **611,800** | **644,700** | **652,900** | **661,800** | **675,700** |
| **pLAn Water Demand Target** | **485,600** | **533,000** | **540,100** | **551,100** | **565,600** |
| **Existing/Planned Supplies** | | | | | |
| Conservation (Additional Active[b] and Passive[c] after FY 14/15 | 125,800 | 110,900 | 111,600 | 109,100 | 108,100 |
| Los Angeles Aqueduct [d] | 275,700 | 293,400 | 291,000 | 288,600 | 286,200 |
| Groundwater [e] (Net) | 112,670 | 110,670 | 106,670 | 114,670 | 114,070 |
| Recycled Water | | | | | |
| -Irrigation and Industrial Use | 19,800 | 29,000 | 39,000 | 42,200 | 45,400 |
| -Groundwater Replenishment | 0 | 30,000 | 30,000 | 30,000 | 30,000 |
| Stormwater Capture | | | | | |
| -Stormwater Reuse (Harvesting) | 400 | 800 | 1,200 | 1,600 | 2,000 |
| -Stormwater Recharge (Increased Pumping) | 2,000 | 4,000 | 8,000 | 15,000 | 15,000 |
| Subtotal | 536,370 | 578,770 | 587,470 | 601,170 | 600,770 |
| **MWD Water Purchases** | | | | | |
| With Existing/Planned Supplies | 75,430 | 65,930 | 65,430 | 30,630 | 74,930 |
| **Total Supplies** | **611,800** | **644,700** | **652,900** | **661,800** | **675,700** |
| **Potential Supplies** | | | | | |
| Water Transfers [f] | 40,000 | 40,000 | 40,000 | 40,000 | 40,000 |
| Subtotal | 40,000 | 40,000 | 40,000 | 40,000 | 40,000 |
| **MWD Water Purchases** | | | | | |
| With Existing/Planned/Potential Supplies | 35,430 | 25,930 | 25,430 | 20,630 | 34,930 |
| **Total Supplies** | **611,800** | **644,700** | **652,900** | **661,800** | **675,700** |

[a] *Total Demand with existing passive conservation.*
[b] *Cumulative hardware savings since late 1980s reached 188,034 AFY by 2014-15.*
[c] *Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAn.*
[d] *LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles supply is estimated to decrease 0.1652% per year due to climate change impact.*
[e] *Net groundwater excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.*
[f] *Potential water transfer occurs in dry years with stored water acquired in average and wet years.*

*Source: LADWP, 2015 Urban Water Management Plan.*

### (2) Local Infrastructure

LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the LAA. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months and operates between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.[20]

### (3) Fire Flow

The 2017 City of Los Angeles Fire Code (Chapter V, Article 7 of the LAMC) establishes different fire flow requirements for different land uses and density. Fire flow requirements range from 2,000 gallons per minute (gpm) from three adjacent fire hydrants flowing simultaneously for low density residential land uses to 12,000 gpm for high density industrial and commercial areas (i.e., principal business districts or Centers). Table IV.J-5 below lists the fire flow requirements by type of land use.[21] Based on correspondence provided by the LAFD, the required fire-flow for this project has been set at 12,000 G.P.M. available to any block (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 G.P.M. will be required).[22]

[20] *Los Angeles Department of Water and Power, website: http://www.ladwp.com/, accessed June 2016.*

[21] *City of Los Angeles, 2014 City of Los Angeles Fire Code, Chapter 5, Table 507.3.1, January 1, 2014.*

[22] *City of Los Angeles Fire Department, written correspondence to the Department of City Planning, ENV-2016-2862-EIR, dated November 6, 2017 (See Appendix I to this EIR).*

**Table IV.J-5**
**Fire Flow by Type of Land Development**

| Type of Land Development | Fire Flow in Gallons per Minute (gpm) |
|---|---|
| Low Density Residential | 2,000 from three adjacent fire hydrants flowing simultaneously |
| High Density Residential and Neighborhood Commercial | 4,000 from four adjacent fire hydrants flowing simultaneously |
| Industrial and Commercial | 6,000 to 9,000 (from four to six fire hydrants flowing simultaneously) |
| High Density Industrial and Commercial<br><br>(Principal Business District and Centers) | 12,000 available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required. |

*Source: City of Los Angeles, Los Angeles Fire Department, 2017 City of Los Angeles Fire Code, Chapter 5, Table 507.3.1, June 2017.*

### (4) Current Water Demands

The Project Site is currently improved with a light manufacturing facility with its associated surface parking lot. For purposes of assessing the current water demands from the existing land uses on the Project Site, the water demand was based on approximately 117,000 square feet of manufacturing or industrial space, which includes 87,000 square feet of manufacturing space, 25,000 square feet of warehouse space, and 5,000 square feet of production space, and approximately 7,150 square feet of irrigated landscaped areas. No water use was estimated for the surface parking areas. As shown in Table IV.J-6, below, the estimated water demand for the existing uses on the Project Site is 9,767 gallons per day (gpd) or approximately 11 AFY.

**Table IV.J-6**
**Estimated Existing Water Demand**

| Land Use | Developed Floor Area (Occupied sf) | Water Demand Rate (gpd/unit) [a] | Total Water Demand (gpd) |
|---|---|---|---|
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 |
| Landscaping | 7,150 sf | (MAWA)[a] | 335 |
| | | **Existing Water Demand:** | **9,767** |

*Notes: gpd = gallons per day; sf = square feet*

[a] *Water demand for existing landscaped areas was based on approximately 7,150 sf of existing landscaped area and the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (MAWA)(LA Green Building Code Sec. 99.04.304).*

*Source: As recommended by LADWP, water demand rates are based on the sewer generation factors provided in the City's LASAN, Wastewater Engineering Services Division correspondence letter, dated April 20, 2017 (See Appendix B to this DEIR).*

# 3. Environmental Impacts

## a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to water supply and infrastructure if it would:

***Threshold (a):*** ***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 of which could cause significant environmental effects;[23] or***

***Threshold (b):*** ***(Not) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.***

[23] *This section of the EIR focuses on the water demand and infrastructure aspect of this threshold question. With respect to wastewater impacts, see Section IV.J-2, Wastewater, below. With respect to stormwater drainage impacts, this issue was concluded to be less than significant and dismissed from further analysis in the Initial Study (See Initial Study Checklist Question IX(c) in Appendix A to this Draft EIR and Section VI, Other CEQA Considerations). Impacts related to electric power, natural gas, or telecommunications are addressed in Section IV.J.4, Electric Power, Natural Gas, and Telecommunications Infrastructure.*

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions.

The Thresholds Guide identifies the following criteria to evaluate water supply and infrastructure impacts:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

## b) Methodology

The proposed Project's water demand was estimated utilizing the wastewater generation rates provided by the City's Department of Public Works, L.A. Sanitation (LASAN), Wastewater Engineering Services Division Correspondence Letter, dated February 2, 2017 (contained in Appendix I to this DEIR). Landscaping water demand was estimated based on the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance. At a regional level, the estimated water demand from the proposed Project was compared to the growth projections discussed in the 2015 UWMP to determine if regional water supplies are considered reliable. Additionally, the local water infrastructure was assessed by the LADWP to determine whether the proposed Project would have any impacts to the local static water pressure in the Project area and if any local improvements are required.

## c) Project Design Features

No specific project design features are proposed with regard to water supply and infrastructure beyond the Project improvements discussed in Section II, Project Description, of this Draft EIR.

## d) Analysis of Project Impacts

***Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?***

### (1) Impact Analysis

Construction of the proposed Project will require trenching and new connections to tie into the existing water distribution lines serving the Project Site. As discussed above, the Project Site is currently served by an existing LADWP 8-inch water line beneath Casitas Avenue. Construction impacts associated with installation of the new service connections would be temporary in nature and would not result in a substantial interruption in water service or inconvenience to existing LADWP customers. Due to the Project Site's location at the end of a cul-de-sac, any temporary impacts to sidewalks and/or partial lane closures on Casitas Avenue would not significantly impact roadway traffic or pedestrian routes.

The Project Site can be supplied with water from the municipal system subject to DWP's Water System's rules and conditions.[24] Based on current static water pressure, there are no known deficiencies in the local water system serving the Project Site.[25] Thus, no off-site improvements to the water infrastructure serving the Project Site is anticipated. Further, as discussed in Section IV.I, Public Services, the proposed Project would comply with all applicable LAMC fire safety requirements, including City fire flow requirements contained in LAMC Section 57.507.3.1, the Building Code (Chapter 9), and the Fire Code (Chapter 7). A Storm Water Pollution Prevention Plan (SWPPP) will be required for on-site construction activities, as required by the State Water Resources Control Board (SWRCB) in accordance the most recently adopted Construction General Permit (CGP). The SWPPP is intended to identify possible sources of water pollution associated with construction of the proposed Project; provide a schedule to construct and maintain BMPs during and after construction; and to develop monitoring and sampling procedures. The SWPPP must indicate the location, type, and method of placement of BMPs that include sandbags, diverters, silt fencing, temporary drainage facilities, and other erosion controls for use during construction, as well as appropriate notes and details. Compliance with these regulations would ensure construction related impacts are less than significant.

***Based on the above, the proposed Project would not exceed the available capacity within the water distribution infrastructure that would serve the Project Site. Accordingly, the Project would not require or result in the construction or relocation of new water facilities or expansion of water facilities, the construction or relocation of which could cause significant environmental effects. In addition, the water distribution capacity would be adequate to serve the proposed Project. Therefore, the proposed Project's operational impacts on water infrastructure would be less than significant.***

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[24] *KHR Associates, Engineering Feasibility Report, June 10, 2016, prepared for 2800 Casitas LLC, (at page 24) (See Appendix P to this EIR).*

[25] *City of Los Angeles Department of Water and Power, Water and Electric Connection Services Request Letter, February 2, 2017. (See Appendix I to this EIR).*

### (2) Mitigation Measures

Project impacts related to water and infrastructure would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Project impacts related to water and infrastructure would be less than significant without mitigation.

***Threshold (b): Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?***

### (1) Impact Analysis

Operation of the proposed Project would increase water demand within the LADWP service area. The proposed Project's water demand is determined based on projections established from LASAN's wastewater generation rates and on whether the estimated water demand of the proposed Project would be within the 25-year water demand growth projected in LADWP's 2015 Urban Water Management Plan.

Currently, the existing Project Site generates a water demand of approximately 9,767 gpd (11 acre-feet per year (AFY) based on the existing active land uses. The proposed Project would replace all buildings and structures on-site with a new mixed-use project comprised of 419 multi-family residential units and 64,000 square feet of commercial space. In accordance with the recommendations in the LADWP correspondence letter[26], the water demand rates are based on sewer generation factors provided by LASAN. As shown in Table IV.J-7, below, the estimated water demand for the proposed Project is approximately 94,790 gpd (106.18 AFY). With consideration of the water consumption generated by existing land uses, the Project's net increase in water demand would be approximately 85,023 gpd, or approximately 95 AFY.

LADWP's water supplies available during normal, single-dry, and multiple-dry water years, as included in the 25-year projection contained in its 2015 UWMP, would meet the projected water demand associated with the proposed Project in addition to the existing and other planned future uses of LADWP system.

Although water supplies are currently available and adequate to serve the needs of the proposed Project, several factors affect the long-term availability of projected water

[26] *City of Los Angeles Department of Water and Power, Water and Electric Connection Services Request Letter, February 2, 2017. (See Appendix I to this EIR).*

supplies for the City of Los Angeles as a whole. As such, the City of Los Angeles imposes water regulatory compliance measures for all projects within its jurisdiction.

**Table IV.J-7**
**Estimated Water Demand by Proposed Project**

| Type of Use | Quantity Unit | Water Use (gpd/unit) [a] | Proposed Water Demand (gpd) | (AFY) |
|---|---|---|---|---|
| **Existing Uses** | | | | |
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 | - |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 | - |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 | - |
| Landscaping | 7,150 sf | (MAWA)[b] | 335 | - |
| | | **Existing Water Demand:** | **9,767** | **11** |
| **Proposed Uses** | | | | |
| **Residential Units (419 total du)** | | | | |
| Studio | 119 du | 75 gpd/du | 8,925 | - |
| One Bedroom | 220 du | 110 gpd/du | 24,200 | - |
| Two-Bedroom | 80 du | 150 gpd/du | 12,000 | - |
| Swimming Pool and Spa [c] | 5,056 cu. ft. | 7.78 gpd / cu. ft. | 39,336 | - |
| | | ***Residential Total:*** | ***84,461*** | ***95*** |
| **Commercial Uses (64,000 total sf)** | | | | |
| Office | 19,000 sf | 0.120 gpd/sf | 2,280 | - |
| Restaurant (3,000 sf [d]) | 133 seats | 30 gpd/seat | 3,990 | - |
| Urban Farm | 42,000 sf | -- [e] | 3,334 | - |
| ***Commercial Subtotal:*** | | | ***9,604*** | ***11*** |
| Landscaping [f] | 15,486 sf | (MAWA) | 725 | ***0.8*** |
| | | **Total Proposed Project Water Demand:** | **94,790** | **106** |
| | | *Minus Existing Demand:* | *- 9,767* | *- 11* |
| | | **Net Additional Water Demand:** | **85,023** | **95** |

*Notes: du: dwelling unit, sf: square feet, gpd: gallons per day; AFY: acre feet per year*
*All numbers rounded to the nearest gpd or AFY.*

[a] *Based on sewer generation rates provided in the City's L.A. Sanitation, Wastewater Engineering Services Division correspondence letter, dated April 20, 2017 (See Appendix B to this DEIR).*

[b] *Water demand for existing landscaped areas was based on approximately 7,150 sf of existing landscaped area and the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (MAWA)(LA Green Building Code Sec. 99.04.304).*

[c] *The estimate for swimming pools is conservative as it is based on replacing the entire volume of water on a daily basis.*

[d] *Restaurant seats were estimated based on 15 sf per seat for the dining area, which was assumed to occupy 2/3 of the restaurant space. Rates were estimated on indoor seating for a conservative estimate.*

[e] *Based on the City of Los Angeles Bureau of Sanitation's estimate contained in the correspondence (dated April 20, 2017) in response to the NOP. See Appendix B to this EIR.*

[f] *Landscaping water demand for the proposed Project was based on 15,486 square feet of landscaped open space area and the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304).*

*Source: Parker Environmental Consultants 2019.*

The proposed Project would be required to implement all applicable water conservation features pursuant to the LAMC, including but not limited to the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9) which requires compliance with mandatory water conservation measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20 percent by: (1) using water saving fixtures or flow restrictions; and/or (2) demonstrating a 20 percent reduction in baseline water use. Accordingly, the proposed Project would incorporate sustainability features such as efficient plumbing features and efficient appliances that would reduce the proposed Project's indoor water demand.

For outdoor water consumption, the proposed Project would be required to comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). With adherence to regulatory compliance measures, which are in place to reduce a development's water consumption, the proposed Project's water consumption would result in a less-than-significant impact.

The 2015 UWMP estimates that the City of Los Angeles would have a water supply of approximately 611,815 AFY and 675,685 AFY in 2020 and 2040, respectively with pLAn targeted water demands of 485,600 AFY in 2020 and 565,600 AFY in 2040. The proposed Project's growth is consistent with SCAG's growth projections in the 2016-2040 RTP/SCS for the Los Angeles subregion, as further discussed in Section IV.H, Population, Housing, and Employment. As such, the additional water demand generated by the proposed Project is accounted for in the 2015 UWMP, and impacts associated with increased water demand would be less than significant. ***Because the water demand of the proposed Project is within the 25-year water demand growth projected in the UWMP and water supplies are considered to be reliable, impacts on regional water supplies would be less than significant.***

### (2) Mitigation Measures

Project impacts related to water supplies would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Project impacts related to water supplies would be less than significant without mitigation.

# e) Cumulative Impacts

## (1) Impact Analysis

### *(a) Water Supply*

In accordance with Section 15130(b)(1)(A)(B) of the CEQA Guidelines, an adequate discussion of a project's significant cumulative impact, in combination with other related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts or (2) a summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes conditions contributing to the cumulative effect. The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. For purposes of assessing the proposed Project's cumulative impact with respect to impacts upon water supply and infrastructure, the analysis below is appropriately based on a combination of the plan-based approach and the list-based approach to determine the proposed Project's contributing effect on potential cumulative impacts on water resources.

Implementation of the proposed Project in conjunction with future development within the City of Los Angeles and throughout the LADWP's service area would further increase cumulative demands for water supplies in the LADWP service area. The cumulative water demand of the related projects within the proposed Project's study area is presented in Table IV.J-8, below. As shown in Table IV.J-8, the net water demand of the proposed Project and related projects totals approximately 272,402 gpd or 305 AFY. The cumulative demand of the proposed Project's water demand in combination with the related projects would represent approximately 0.047 percent of the LADWP's anticipated water demand for 2025, which is the closest planning projection to the project buildout date, and 0.045 percent of the LADWP's water demand for 2040, which is LADWP's long-term planning projection (see Table IV.J-2, above). In terms of the City's overall water supply condition, the water demand for projects that are consistent with the regional growth projections contained in the 2015 UWMP have been taken into account in the planned growth of the water distribution system. For projects that are not consistent with the regional growth projections factored into the 2015 UWMP or that meet the requirements established in Sections 10910-10915 of the State Water Code, a Water Supply Assessment report demonstrating sufficient water availability would be required on a project-by-project basis. Further, the proposed Project and related project would further be required to meet the prescriptive water conservation plumbing fixture requirements of the Los Angeles Green Building Code, which would decrease the proposed Project water demand. ***Because the proposed Project's anticipated water demands are within the growth projections of the 2015 UWMP, and the cumulative demands of the proposed Project and related projects do not exceed the demand***

**Table IV.J-8**
**Estimated Cumulative Water Demand**

| Project Number | Project Name | Project Description | Size | Water Demand Rate (gpd/unit) [a,b] | Total Water Demand (gpd) |
|---|---|---|---|---|---|
| 1 | Mixed-Use – Taylor Yard Village | Retail | 25,000 sf | 0.025 gpd/sf | 625 |
| 2 | 2600 Riverside Dr Condos | Condominiums | 120 du | 150 gpd/du | 18,000 |
| 3 | New Life Vision Church | Church | 4,078 seats [c] | 4 gpd/seat | 16,312 |
| 4 | Blake Ave Riverfront (Blake / Blimp) | Condominiums | 142 du | 150 gpd/du | 21,300 |
| | | Retail | 4,898 sf | 0.025 gpd/sf | 122 |
| | | Restaurant | 167 seats [d] | 30 gpd/seat | 5,010 |
| | | Coffee / Donut Shop (No drive through) | 1,000 sf | 0.280 gpd/sf | 280 |
| 5 | Charter School | High School | 200 seats | 11 gpd/stu | 2,200 |
| | | Middle School | 150 seats | 9 gpd/stu | 1,350 |
| | | Elementary School | 300 seats | 9 gpd/stu | 2,700 |
| 6 | Glendale Apartments | Apartments | 50 du | 150 gpd/du | 7,500 |
| | | Retail | 559 sf | 0.025 gpd/sf | 14 |
| 10 | 2910 San Fernando | Condominiums | 370 du | 150 gpd/du | 55,500 |
| 11 | 3061 Riverside Dr. Residential Project | Apartments | 84 du | 150 gpd/du | 12,600 |
| 12 | Play Silverlake | Childcare | 175 stu | 9 gpd/stu | 1,575 |
| 15 | Bowtie Park Project | Future Park | 18 acres | -- [e] | 42,291 |
| | | | | **Total Related Projects Water Demand:** | **187,379** |
| | | | | **Total Project Net Water Demand:** | 85,023 |
| | | | | **TOTAL CUMULATIVE:** | **272,402** |

*Notes:*
*du = dwelling unit, sf = square feet, emp = employee, stu = student*
*-Uses not listed are estimated by the closest type of use available in the table.*
*- Conversions of floor area per occupant based on California Building Code (2013), Ch.10, Table 1004.1.2.*
[a] *Based on sewer generation factors provided in the LADWP correspondence letter, dated February 2, 2017 (See Appendix I to this DEIR).*
[b] *Consumption rate for feeling units was based on 2 bedrooms per unit as a conservative estimate.*
[c] *Rate used to determine seating is 7 square feet per seat. It is assumed that approximately 1/3 of the total square footage of the church is used for seating.*
[d] *Rate used to determine seating is 15 square feet per seat. Restaurant uses assume indoor seating for conservative estimate. It is assumed that approximately 2/3 of the restaurant square footage is used for the dining area and the remaining 1/3 restaurant square footage is used for the kitchen, bathrooms, and service areas.*
[e] *Park water usage calculated using California Code of Regulations, Model Water Efficient Landscape Ordinance for Estimated Total Water Use (ETWU).*
*Source: Parker Environmental Consultants, 2019.*

***forecast for the LADWP service area, the proposed Project's contribution to impacts upon the City's water resources would not be cumulatively considerable and would be less than significant.***

*(b) Water Infrastructure*

Construction of the proposed Project, in combination with the related projects, would increase the demand and utilization of existing water infrastructure. Based on a review of the related projects list identified in Table III-2 in Section III, Environmental Setting, the closest related projects to the Project Site are Related Project No. 10 (located 700 feet to the east of the Project Site at 2910 W. San Fernando Road) and Related Project No. 15 (the proposed Bow Tie Park Project located adjacent to the Project Site at 2780 Casitas Avenue). The proposed Project would be served by a water main on Casitas Avenue. Since Related Project No. 10 is located along San Fernando Road, it is unlikely that the proposed Project would share the same water mains as this related project. With respect to proposed Bow Tie Park Project, other than landscaping, this park is not expected to generate a high water demand. This related project site currently consists of natural vegetation and does not contain any water-intensive vegetation and plants. In the event that the Bow Tie Park would redevelop the site with turf and restrooms, this related project would be responsible for any water infrastructure improvements. ***As such, the cumulative impact associated with water infrastructure would be considered less than significant.***

### (2) Mitigation Measures

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

### (3) Level of Significance After Mitigation

Cumulative impacts related to water supplies and infrastructure would be less than significant without mitigation.

# IV. Environmental Impact Analysis

# J.2 Utilities and Service Systems -- Wastewater

## 1. Introduction

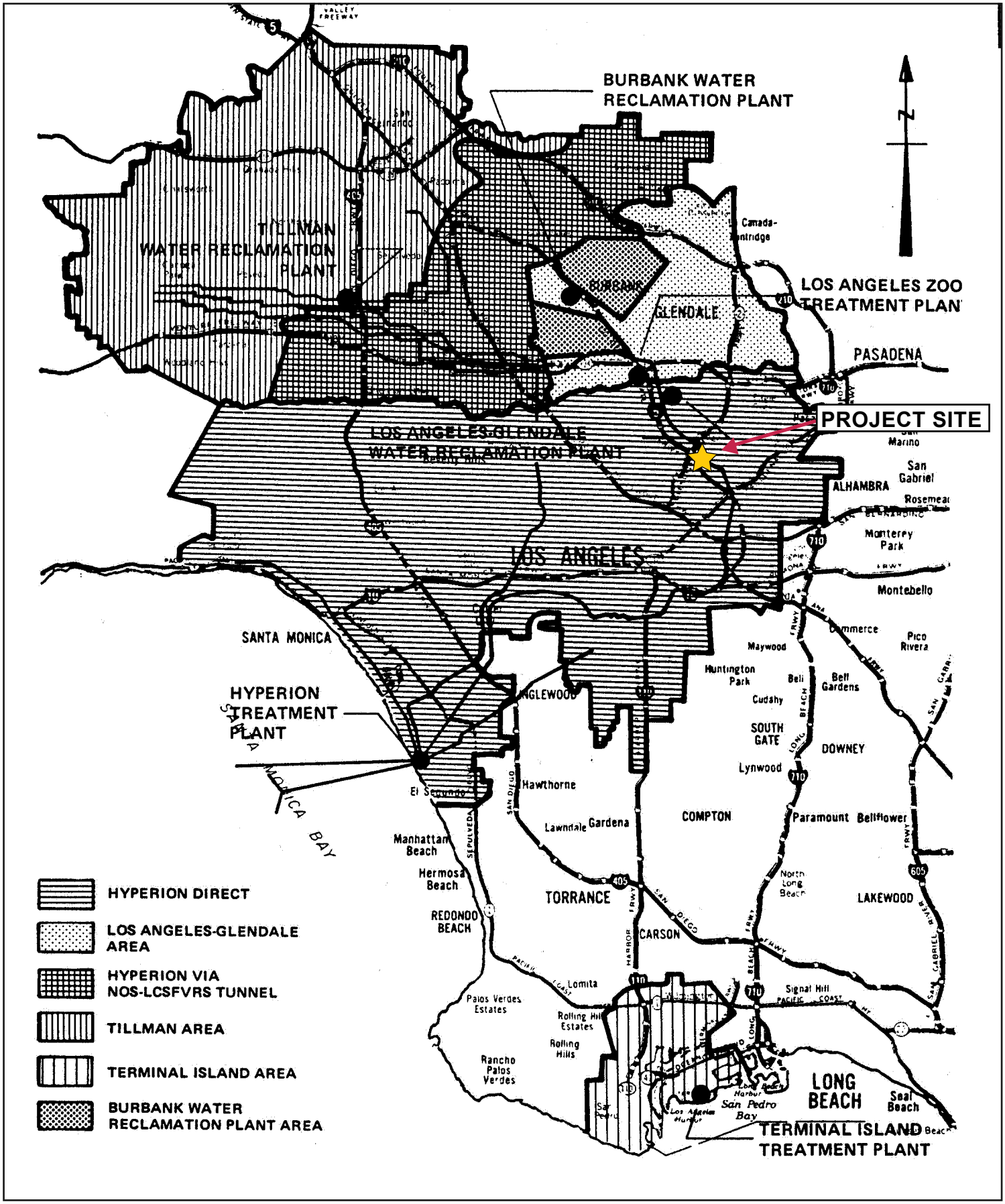
The following section analyzes the proposed Project's wastewater infrastructure and the associated demands the proposed Project would place upon regional wastewater treatment facilities that serve the Project area. Specifically, this section quantifies the anticipated operational wastewater generation for the proposed development and identified applicable water conservation features that are either proposed by design or otherwise regulated by applicable building codes and regulations. The data and information regarding wastewater infrastructure is based in part on the information provided by the City of Los Angeles Department of Public Works, Bureau of Sanitation[27] and the Utility Infrastructure Report provided in Appendix P to this EIR.

## 2. Environmental Setting

The City of Los Angeles Department of Public Works, Bureau of Sanitation Division provides sewer conveyance infrastructure and wastewater treatment services to the Project Area. The Hyperion Water Reclamation Plant (HWRP), located southwest of the Los Angeles International Airport in Playa Del Rey, provides treatment capacity for all wastewater flows generated within the Project Area. On average, 275 million gallons of wastewater enters the HWRP on a dry weather day. Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons of water per day (MGD) and peak wet weather flow of 800 MGD.[28] The Donald C. Tillman Water Reclamation Plant (Tillman) in the Sepulveda Basin and the Los Angeles-Glendale Water Reclamation Plant (LAG) in northeast Los Angeles also treat wastewater generated in the Hyperion Service Area and have existing treatment capacities of 80 mgd and 20 mgd, respectively. Figure IV.J-2, City of Los Angeles Wastewater Treatment System, depicts

[27] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Response to Request for Wastewater Service Information, July 11, 2016 (see Appendix I to this EIR).*

[28] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: www.lacitysan.org, accessed October 2018.*




Source: Los Angeles CEQA Thresholds Guide, Utilities, Exhibit M.2-1, 2006.

Figure IV.J-2
City of Los Angeles Wastewater Treatment System

the existing wastewater treatment plants and their service areas within the City of Los Angeles.

The Hyperion Service Area (HSA) encompasses approximately 328,000 acres, or approximately 515 square miles, of the greater Los Angeles area and serves approximately 4 million people. The HSA also serves 53,000 acres outside the jurisdiction of the City of Los Angeles on a contract basis. The HSA includes approximately 96 percent of the total area served by the LADWP.

# a) Regulatory Setting

## (1) Wastewater Facilities Plan/Integrated Resources Plan

The City's sewer system is subject to Section 201 of the Federal Clean Water Act. According to the Clean Water Act, the City must adopt a facilities plan in accordance with the United States Environmental Protection Agency (USEPA) Rules and Regulations, 40 CFR, Section 35.917.

Facilities planning will demonstrate the need for the proposed facilities. Through a systematic evaluation of feasible alternatives, it will also demonstrate that the selected alternative is cost-effective, i.e., is the most economical means of meeting established effluent and water quality goals while recognizing environmental and social considerations.

The City prepared a Wastewater Facilities Plan in 1982 and updated it in 1991. The 1991 Wastewater Facilities Plan update planned for facilities through the year 2010 and currently regulates wastewater facilities in the City. The Wastewater Facilities Plan is focused primarily on developing cost-effective construction improvements and analyzes wastewater, water recycling, and stormwater services in the City. In 1990, in response to insufficient sewer capacity, the City adopted Ordinance No. 166,060, which is discussed in detail below. The Ordinance No. 166,060 establishes sewer permit allocation regulations for projects that discharge sewage to the Hyperion Treatment System.

As a follow-up to these plans and programs, the City adopted the Integrated Resources Plan in 2006. The Integrated Resources Plan incorporates a new City-prepared Wastewater Facilities Plan to address demand and capacity through 2020. The Integrated Resources Plan serves to update the information prepared in the 1991 Wastewater Facilities Plan, while also considering the needs of the City's recycled water and urban runoff systems. Specifically, the Integrated Resources Plan was developed to accommodate the projected increase in wastewater flow over the next 20 years while maximizing the beneficial reuse of recycled water and urban runoff and, as a result, optimizing the use of the City's existing facilities and water resources. Growth projections and data sources used in the Integrated Resources Plan were based on the Southern

California Association of Governments (SCAG) 2001 Regional Transportation Plan, which estimated that the population of Los Angeles would reach almost 4.3 million people by 2020.

In order to meet the future demands posed by increased wastewater generation, the City chose to expand its current overall treatment capacity, while maximizing the potential to reuse recycled water through irrigation and other approved uses, including groundwater replenishment. According to the Integrated Resources Plan, the only water reclamation plant capable of providing recycled water for replenishment at existing spreading grounds is the Donald Tillman Water Reclamation Plant in the Sepulveda Basin in Van Nuys. The Tillman Water Reclamation Plant may be increased in size to convey approximately 100 million gallons per day of wastewater by 2020. These improvements, along with new sewer pipelines, will ensure that untreated wastewater is not discharged to rivers or the ocean, thereby protecting the environment.

As previously stated, the Integrated Resources Plan also proposes to maximize recycled water reuse through groundwater replenishment. This is considered a valuable potential benefit, since it would allow the City to reduce the need to import water from other regions. However, the Integrated Resources Plan states that if the City does not implement groundwater replenishment by the time additional treatment capacity is needed, the expansion of wastewater treatment capacity would occur at the Hyperion Water Reclamation Plant rather than at the Tillman Water Reclamation Plant. This will result in additional wastewater capacity levels at the Hyperion Water Reclamation Plant and improved sewer facilities.

In general, implementation of the Integrated Resources Plan will enable the City to adequately convey wastewater to the treatment plants with minimal potential for sewage spills. It will also enable the City to treat future wastewater flows while protecting public health and safety and meeting regulatory requirements, thereby protecting the environment and surface waters.

## (2) Wastewater System Facilities

### *(a) Hyperion Water Reclamation Plant*

As discussed above, the Hyperion Water Reclamation Plant (HWRP) is located in Playa Del Rey and serves an area of approximately 515 square miles. The HWRP is subject to the State Ocean Plan, the Clean Water Enforcement and Pollution Prevention Act of 1999 (SB 709), and a National Pollution Discharge Elimination System (NPDES) Permit (CA0109991). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet

weather flow of 800 mgd.[29] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. Furthermore, the HWRP is subject to City of Los Angeles Ordinance No. 166,060 (discussed below), which limits the annual increase in wastewater discharge into the Hyperion Treatment System to five million gallons per day.

*(b) City of Los Angeles Sewer Allocation Ordinance*

The City of Los Angeles Sewer Allocation Ordinance (Ordinance No. 166,060) was adopted in 1990 and established specific regulations for projects that discharge to the HWRP. The ordinance established an annual sewage allotment for priority projects, public benefit projects, and non-priority projects.

Before the Los Angeles Department of Building and Safety (LADBS) formally accepts a project's set of plans and specifications for plan check, the Bureau of Sanitation must first determine if there is allotted sewer capacity available for the project. The Bureau of Sanitation will not make such a determination until LADBS has established that the project's plans and specifications are acceptable for plan check. If the Bureau of Sanitation determines that allotted sewer capacity is available for the proposed Project, LADBS will accept the plans and specifications for plan check upon the payment of plan check fees. If the project is eligible to receive an allocation as a non-priority project, and the monthly sewage allotment has been used, then the project would be placed on a waiting list for the next month's allocation. At the request of a project applicant, LADBS may accept the project's plans and specifications as acceptable for plan check even if the project has been placed on the waiting list, and a sewer permit has not yet been obtained from the Bureau of Sanitation, with the understanding that the project will not be able to connect to the City's wastewater system until capacity is available and a sewer permit issued.

*(c) Wastewater Conveyance Facilities*

Over 6,500 miles of sewer lines convey wastewater to the City's four wastewater treatment plants. Approximately 550 million gallons per day flow through the system, which serves both the City of Los Angeles and 29 contracting cities and agencies.

The City regulates the sewer conveyance system through the Collection System Settlement Agreement (CSSA) and the 10-year L.A. Sewers Program. The CSSA, which has a compliance term of 10 years, is a settlement agreement reached in 2004 to resolve a lawsuit brought against the City by the Santa Monica Baykeeper and other community organizations, as a result of sanitary sewer overflows that occurred in the City in February 1998. The CSSA requires the City to enhance, repair, and update the sewer system and

[29] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: www.lacitysan.org, accessed December 2016.*

sets specific timelines for the City to complete the upgrades. It also mandates that the City spend $8.5 million in supplemental environmental enhancement projects. Each year, the City prepares annual progress reports detailing its success at meeting the terms of the CSSA. The City of Los Angeles completed its tenth and final Annual Report for the CSSA for the fiscal year ending June 30, 2014. The report documents the City's progress and continued commitment to meet the CSSA objectives and goals during Fiscal Years 2003/04 to 2013/14. The City has completed all 151 deliverables of the CSSA, the majority of which were completed ahead of schedule, and is in full compliance with the requirements of the CSSA. The City has also completed all of its deliverables required by the 1st, 2nd, and 3rd Modifications.[30] The 10-year L.A. Sewers Program was put into place in conjunction with the CSSA in order to regulate maintenance and construction project schedules.

## b) Existing Conditions

### (1) Existing Wastewater Flows

The Project Site is currently improved with a light manufacturing facility and its associated surface parking lot. For purposes of assessing the current wastewater generation from the existing land uses on the Project Site, the daily wastewater flows were based on an approximately 117,000 square foot industrial building, which includes 87,000 square foot manufacturing space, 25,000 square foot warehouse, and 5,000 production space. Based on the projections provided in Table IV.J-9, below, the estimated wastewater flows of the existing land uses on the Project Site is approximately 9,432 gpd.

The Project area is presently served by a network of sewer lines that are located beneath major streets and along property lines within the Project Site area. The sewer infrastructure in the vicinity of the proposed Project includes an existing 8-inch line on Casitas Avenue. The sewage from the existing 8-inch line feeds into a 36 inch line on Gilroy Street R/W before discharging into a 48-inch line on Blake Avenue.[31]

[30] *City of Los Angeles, Department of Public Works, Collection System Settlement Agreement, 10 Years Collection System Settlement Agreement Fiscal Year 2013/14, September 30, 2014.*

[31] *City of Los Angeles, Bureau of Sanitation, Correspondence, April 20, 2017. (Appendix B)*

**Table IV.J-9**
**Estimated Existing Wastewater Generation**

| Land Use | Developed Floor Area (Occupied sf) | Wastewater Generation Rate (gpd/unit) [a] | Total Wastewater Generated (gpd) |
|---|---|---|---|
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 |
| **Total Existing Wastewater Generation:** | | | **9,432** |

*Notes: gpd = gallons per day; sf = square feet*
[a] *Sewer generation from existing conditions provided by City of Los Angeles, Wastewater Engineering Services Division Correspondence Letter, dated April 20, 2017 (See Appendix B to this DEIR).*
*Source: Parker Environmental Consultants, 2018.*

# 3. Environmental Impacts

## a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project were to:

***Threshold a) Require or result in the relocation or construction of new 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;[32] or***

***Threshold b) Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.***

In accordance with the Thresholds Guide, a project would normally have a significant wastewater impact if:

[32] *This section of the EIR focuses on the wastewater treatment impacts of this threshold question. With respect to water impacts, see Section IV.J-1, Water, above. With respect to storm water drainage impacts, this issue was concluded to be less than significant and dismissed from further analysis in the Initial Study (See Initial Study Checklist Question IX(c) in Appendix A to this Draft EIR and Section VI, Other CEQA Considerations). Impacts related to electric power, natural gas or telecommunications are addressed in Section IV.J.4, Electric Power, Natural Gas, and Telecommunications Infrastructure.*

***a) The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or***

***b) The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.***

***c) Wastewater generation associated with the proposed Project was calculated using generation factors based on land use, as provided by the City of Los Angeles Bureau of Engineering. The estimated net increase was analyzed relative to infrastructure and treatment plant capacity.***

## b) Methodology

For purposes of evaluating wastewater impacts associated with construction and operation of the Project, the analysis below compares the proposed Project's anticipated wastewater flow with the capacity of the existing wastewater infrastructure and facilities that serve the Project Site. To evaluate potential impacts relative to wastewater treatment capacity, this analysis evaluates whether the treatment capacity within the Hyperion Service Area would be available to accommodate the Project based on the estimate of the proposed Project's wastewater generation and data from LASAN. Based on this analysis, a determination is made as to whether the existing wastewater infrastructure and facilities can accommodate the Project's wastewater flow.

## c) Project Design Features

No Project Design Features are proposed that specifically address wastewater impacts.

## d) Analysis of Project Impacts

***Threshold a) Would the Project require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?***

### (1) Impact Analysis

Construction of the proposed Project will require trenching and new connections to tie into the existing wastewater distribution lines serving the Project Site. As discussed above, the Project Site is currently served by an existing 15-inch sewer line beneath Casitas Avenue. Based on estimated sewer flows, LASAN has indicated the sewer

system might be able to accommodate sewer flows for the proposed project; however further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point.[33] Construction impacts associated with tying into the existing service connections would be temporary in nature and would not result in a disruption to the wastewater system. Due to the Project Site's location at the end of a cul-de-sac, any temporary impacts to sidewalks and/or partial lane closures on Casitas Avenue would not significantly impact roadway traffic or pedestrian routes.

The proposed Project would be required to implement stormwater control measures during its construction phase. As discussed above in Section IV.J.1, Water, a SWPPP will be required for all on-site construction activities, as required by the SWRCB in accordance the most recently adopted Construction General Permit CGP. The SWPPP is intended to identify possible sources of water pollution associated with construction of the proposed Project; provide a schedule to construct and maintain BMPs during and after construction; and to develop monitoring and sampling procedures. The SWPPP must indicate the location, type, and method of placement of BMPs that include sandbags, diverters, silt fencing, temporary drainage facilities, and other erosion controls for use during construction, as well as appropriate notes and details. Compliance with these regulations would ensure construction related impacts are less than significant. ***As such, construction of the proposed Project would result in a less-than-significant impact with respect to wastewater conveyance infrastructure.***

### (2) Mitigation Measures

Project impacts related to construction of wastewater infrastructure would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Project impacts related to construction of wastewater infrastructure would be less than significant without mitigation.

***Threshold b) Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

### (1) Impact Analysis

The proposed Project would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. As shown in Table

[33] *See correspondence from the City of Los Angeles Department of Public Works, Bureau of Sanitation to the Department of City Planning, dated July 11, 2016 (provided in Appendix I to this EIR).*

IV.J-10, the proposed Project is anticipated to generate approximately 94,065 gallons per day (gpd) of wastewater. When considering the existing uses on-site, the proposed Project would result in a net increase 84,633 gpd of wastewater. Sewage generated by the proposed Project would be conveyed and treated at the HWRP, which has the capacity to accommodate approximately 175 mgd of wastewater above current wastewater flows. Thus, RWQCB treatment standards area would be maintained and impacts would be less than significant.

**Table IV.J-10**
**Proposed Project Estimated Wastewater Generation**

| Type of Use | Size | Wastewater Demand Rate (gpd/unit) [a] | Total Wastewater Demand (gpd) |
|---|---|---|---|
| **Existing Uses** | | | |
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 |
| | | **Existing Wastewater Generation:** | **9,432** |
| **Proposed Project** | | | |
| **Residential Units (419 total du)** | | | |
| Studio | 119 du | 75 gpd/du | 8,925 |
| One Bedroom | 220 du | 110 gpd/du | 24,200 |
| Two-Bedroom | 80 du | 150 gpd/du | 12,000 |
| Swimming Pool and Spa [b] | 5,056 cu. ft. | 7.78 gpd/cu. ft. | 39,336 |
| | | ***Residential Subtotal:*** | ***84,461*** |
| **Commercial Uses (64,000 total sf)** | | | |
| Office | 19,000 sf | 0.12 gpd/sf | 2,280 |
| Restaurant (3,000 sf) | 133 seats [c] | 30 gpd/seat | 3,990 |
| Urban Farm | 42,000 sf | --[d] | 3,334 [d] |
| | | ***Commercial Subtotal:*** | ***9,604*** |
| | | **Total Project Wastewater Generation:** | **94,065** |
| | | *Less Existing Wastewater Generation:* | *-9,432* |
| | | **NET TOTAL Wastewater Generation:** | **84,633** |

*Notes: sf =square feet; du = dwelling units, gpd: gallons per day*

[a] *Based on correspondence with the City of Los Angeles Bureau of Sanitation (dated April 20, 2017). Contained in Appendix B to this DEIR.*

[b] *Included based on the correspondence with the City of Los Angeles Bureau of Sanitation (dated April 20, 2017). Contained in Appendix B to this DEIR. This estimate is conservative as it is based on draining the entire volume of swimming pool water on a daily basis.*

[c] *Seats were estimated based on 15 sf per seat for the dining area, which was assumed to occupy 2/3 of the restaurant space.*

[d] *Correspondence with the City of Los Angeles Bureau of Sanitation (dated April 20, 2017) estimates that the urban farm would generate 100,000 gallons per month of wastewater. 3,333 gpd was estimated based on 100,000 gal/month / 30 days/month. (Correspondence with the City of Los Angeles Bureau of Sanitation is included in Appendix B.*

*Parker Environmental Consultants, 2018.*

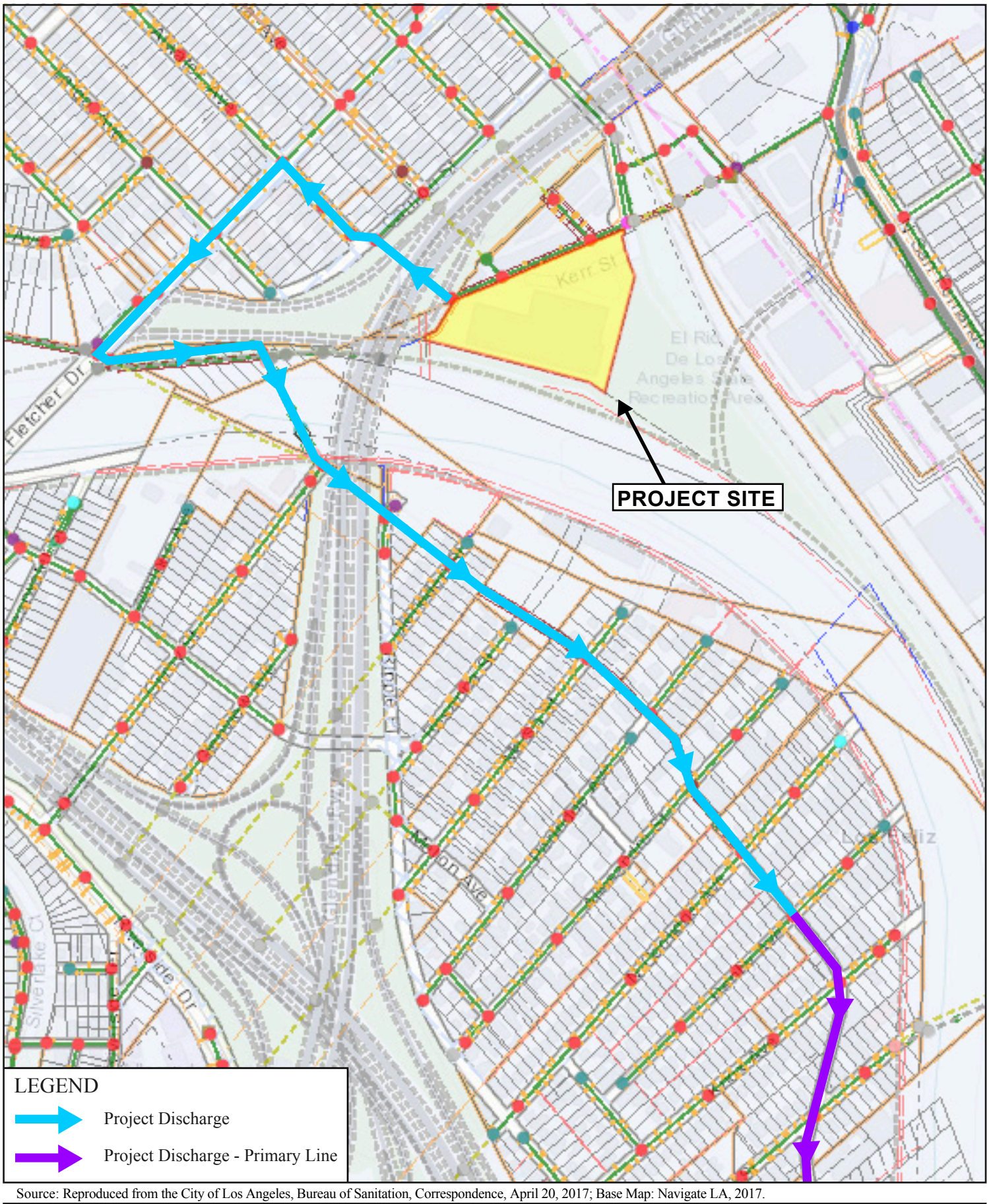
Water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures that prevent water loss, etc.) would be implemented as part of the proposed Project (refer to Tables IV.J-5 and IV.J-6). These measures would help reduce the amount of wastewater generated by the proposed Project and would further reduce Project impacts with respect to the wastewater treatment capacity. Based on correspondence with the Bureau of Sanitation (BOS), the sewer infrastructure in the vicinity of the Project Site includes an existing 8-inch line on Casitas Avenue. The sewage from the existing 8-inch line feeds into a 36-inch line on Gilroy Street R/W before discharging into a 48-inch sewer line on Blake Avenue. Figure IV.J-3, Sewer Map, below, details the sewer system within the vicinity of the Project Site. The current approximate flow level (d/D) and the design capacities at d/D of 50 percent in the sewer system are shown in Table IV.J-11:

**Table IV.J-11**
**Existing Sewer Line Capacities**

| Pipe Diameter (in) | Pipe Location | Current Gaging d/D (%) | 50% Design Capacity |
|---|---|---|---|
| 8 | Casitas Avenue | * | 676,405 gpd |
| 15 | Fletcher Drive | 42 | 866,833 gpd |
| 48 | Fletcher Drive | * | 24.76 mgd |
| 36 | Gilroy Street R/W | * | 93.87 mgd |
| 48 | Gilroy Street R/W | 61 | 22.81 mgd |
| 48 | Blake Avenue | 58 | 21.98 mgd |

*Notes:*
*gpd = gallons per day; mgd = million gallons per day*
** symbol indicates that no gauging is available.*
*Source: City of Los Angeles, Bureau of Sanitation, Correspondence, April 20, 2017. Included in Appendix B.*

Based on the current gauging information as presented in Table IV.J-11, BOS has stated that the sewer system might be able to accommodate the total flow for the proposed Project. Further detailed gauging and evaluation would, however, be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, the Applicant would be required to build sewer lines to a point in the sewer system with sufficient capacity. If this is required, the Applicant would follow the guidance and coordinate with the Department of Public Works, Bureau of Sanitation. A final approval for sewer capacity and connection permit would be made at that time. ***Therefore, the proposed Project's impacts with respect to the existing wastewater treatment capacity would be less than significant.***




Source: Reproduced from the City of Los Angeles, Bureau of Sanitation, Correspondence, April 20, 2017; Base Map: Navigate LA, 2017.

Figure IV.J-3
Sewer Lines in Project Site Area and Project's Sewer Flow

### (2) Mitigation Measures

Project impacts related to wastewater treatment capacity would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Project impacts related to wastewater treatment capacity would be less than significant without mitigation.

## e) Cumulative Impacts

In accordance with Section 15130(b)(1)(A)(B) of the CEQA Guidelines, an adequate discussion of a project's significant cumulative impact, in combination with other related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes conditions contributing to the cumulative effect. The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. For purposes of assessing the proposed Project's cumulative impact with respect to impacts upon wastewater treatment and infrastructure, the analysis below is appropriately based on a combination of the plan-based approach and the list-based approach to determine the proposed Project's contributing effect on potential cumulative impacts on water resources.

### (1) Impact Analysis

#### *(a) Wastewater Treatment Capacity*

Implementation of the proposed Project in conjunction with the related projects identified in Section III, Environmental Setting, would further increase demands of sewer service. The proposed Project and all of the related projects located in the City of Los Angeles and the City of Glendale are serviced by the Hyperion Water Reclamation Plant. As shown in Table IV.J-12, Estimated Cumulative Wastewater Generation, the total sewage generation by the related projects and the proposed Project would be approximately 295,117 gpd, or about 0.30 mgd.

The combined 295,117 gpd of cumulative sewage generation for the proposed Project and the related projects would represent less than one percent of HWRP's excess treatment capacity presently available, which is 175 mgd. This increase would be well within the remaining treatment capacity currently available and projected to be available at HWRP. Therefore, the proposed Project in combination with the related projects would not require the construction of new wastewater treatment facilities or the expansion of

existing wastewater treatment facilities. Similar to the proposed Project, each related project would be evaluated on a case-by-case basis. Each related project would be required to consult with the Bureau of Sanitation and comply with all applicable City and state water conservation programs and sewer allocation ordinances. ***Therefore, cumulative impacts on wastewater services would be less than significant.***

*(b) Wastewater Infrastructure*

Similar to the analysis for the proposed Project, development of the related projects occurring in the vicinity of the Project Site would be required to coordinate with LASAN to determine adequate sewer capacity. All new development projects are subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements. Furthermore, similar to the Project, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. ***Therefore, Project impacts on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts on wastewater infrastructure would be less than significant.***

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Significance After Mitigation

The proposed Project's impact upon wastewater treatment and infrastructure systems would be less than significant without mitigation. No mitigation measures are required.

## Table IV.J-12
## Estimated Cumulative Wastewater Generation

| Project Number | Project Name | Project Description | Size | Wastewater Generation Rate (gpd/unit) [a,b] | Total Wastewater Generation (gpd) |
|---|---|---|---|---|---|
| ***City of Los Angeles*** | | | | | |
| 1 | Mixed-Use – Taylor Yard Village | Retail | 25,000 sf | 0.025 gpd/sf | 625 |
| 2 | 2600 Riverside Dr Condos | Condominiums | 120 du | 150 gpd/du | 18,000 |
| 3 | New Life Vision Church | Church | 4,078 seats [c] | 4 gpd/seat | 16,312 |
| 4 | Blake Ave Riverfront (Blake / Blimp) | Condominiums | 142 du | 150 gpd/du | 21,300 |
| | | Retail | 4,898 sf | 0.025 gpd/sf | 122 |
| | | Restaurant | 167 seats [d] | 30 gpd/seat | 5,010 |
| | | Coffee / Donut Shop (No drive through) | 1,000 sf | 0.280 gpd/sf | 280 |
| 5 | Charter School | High School | 200 seats | 11 gpd/stu | 2,200 |
| | | Middle School | 150 seats | 9 gpd/stu | 1,350 |
| | | Elementary School | 300 seats | 9 gpd/stu | 2,700 |
| 6 | Glendale Apartments | Apartments | 50 du | 150 gpd/du | 7,500 |
| | | Retail | 559 sf | 0.025 gpd/sf | 14 |
| 10 | 2910 San Fernando | Condominiums | 370 du | 150 gpd/du | 55,500 |
| 11 | 3061 Riverside Dr. Residential Project | Apartments | 84 du | 150 gpd/du | 12,600 |
| 12 | Play Silverlake | Childcare | 175 stu | 9 gpd/stu | 1,575 |
| 15 | Bowtie Park Project | Future Park | 18 acres | -- | -- [e] |
| | | | | *Related Projects within the City of Los Angeles Wastewater Generation Subtotal* | *145,088* |
| ***City of Glendale*** | | | | | |
| 7 | Medical Office | Medical Office | 24,194 sf | 0.250 gpd/sf | 6,049 |
| | | Pharmacy | 435 sf | 0.025 gpd/sf | 11 |
| 8 | Multi-family, Commercial, Studio | Multi-Family | 142 du | 150 gpd/du | 21,300 |
| | | Commercial | 11,600 sf | 0.025 gpd/sf | 290 |
| | | Studio | 5,000 sf | 0.05 gpd/sf | 250 |
| 9 | Tropico Apartments | Multi-Family | 238 du | 150 gpd/du | 35,700 |
| 13 | Medical Office | Medical Office | 6,782 sf | 0.250 gpd/sf | 1,696 |
| 14 | Glendale Beeline Bus Maintenance Facility | Bus Maintenance Facility | 25,500 sf | 100 gpd/bathroom [f] | 100 |
| | | | | *Related Projects within the City of Glendale Wastewater Generation Subtotal* | *65,396* |
| | | | | **Total Related Projects Wastewater Generation:** | **210,484** |
| | | | | **Total Project Net Wastewater Generation:** | 84,633 |
| | | | | **TOTAL CUMULATIVE:** | **295,117** |

*Notes:*
*du = dwelling unit, sf = square feet, emp = employee, stu = student*
*-Uses not listed are estimated by the closest type of use available in the table.*
*- Conversions of floor area per occupant based on California Building Code (2013), Ch.10, Table 1004.1.2.*

| Project Number | Project Name | Project Description | Size | Wastewater Generation Rate (gpd/unit) [a,b] | Total Wastewater Generation (gpd) |
|---|---|---|---|---|---|

[a] *Based on sewer generation factors provided in the LADWP correspondence letter, dated February 2, 2017 (See Appendix I to this DEIR).*
[b] *Consumption rate for feeling units was based on 2 bedrooms per unit as a conservative estimate.*
[c] *Rate used to determine seating is 7 square feet per seat. It is assumed that approximately 1/3 of the total square footage of the church is used for seating.*
[d] *Rate used to determine seating is 15 square feet per seat. Restaurant uses assume indoor seating for conservative estimate. It is assumed that approximately 2/3 of the restaurant square footage is used for the dining area and the remaining 1/3 restaurant square footage is used for the kitchen, bathrooms, and service areas.*
[e] *Assumes that all water usage for park would be absorbed by landscaping and would not generate wastewater.*
[f] *Assumes one bathroom provided on the proposed bus maintenance facility.*
*Source: Parker Environmental Consultants, 2018.*

# IV. Environmental Impact Analysis

# J.3 Utilities and Service Systems -- Solid Waste

## 1. Introduction

The following section analyzes the proposed Project's construction and solid waste generation and the associated demands the proposed Project would place upon regional landfills that serve the Project area. Specifically, this section quantifies the anticipated construction and operational solid waste generation for the proposed development and identifies applicable solid waste reduction strategies that are required by building code regulations. The Countywide Integrated Waste Management Plan 2016 Annual Report is incorporated by reference and is available for review through County of Los Angeles, Department of Public Works' website, at *http://dpw.lacounty.gov/epd/swims/*.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) State

##### *(a) Assembly Bill 939 – California Integrated Waste Management Act of 1989*

The California Integrated Waste Management Act of 1989 (AB 939) was the first recycling legislation in the country to mandate recycling diversion goals. AB 939 required all California cities, counties and approved regional solid waste management agencies responsible to enact plans and programs to reduce waste disposal. Jurisdictions were required to meet diversion goals of 50 percent by the year 2000 and a statewide goal of 75 percent by 2020. AB 939 also established an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. California has successfully used AB 939 to motivate cities and counties to reduce reliance on landfill disposal and increase waste diversion through recycling, composting, and source reduction.

AB 939 was amended in 2012 by AB 341, which requires jurisdictions meet a solid waste diversion goal of 75 percent by the year 2020, and requires commercial enterprises and

public entities that generate four or more cubic yards (cy) per week of solid waste, and multi-family housing complexes with five or more units, to adopt recycling practices that achieve a 75 percent reduction in their waste streams. Such business/residential development must: (1) source separate recyclable materials from the solid waste they are discarding, and either self-haul or arrange for separate collection of the recyclables; and (2) subscribe to a service that includes mixed waste processing that yields diversion results comparable to source separation.

*(b) Assembly Bill 1327 – California Solid Waste Reuse and Recycling Access Act of 1991*

The California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327) required CalRecycle to develop a model ordinance for adoption of recyclable materials in development projects by March 1, 1993. Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. In response to this legislation, the City of Los Angeles passed the Recycling Space Allocation Ordinance (Ord No. 171,687).

*(c) Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements*

Senate Bill 1374 was signed into law in 2002 to assist jurisdictions with diverting their construction and demolition (C&D) waste material. SB 1374 requires that the CIWMB (now CalRecycle) complete five items in regards to the diversion of construction and demolition waste: (1) adopt a model ordinance for diverting 50 percent to 75 percent of all construction and demolition debris from landfills; (2) consult with multiple regulators and waste entities (e.g., California State Association of Counties, private and public waste services, building construction materials industry, etc.) during the development of the model ordinance; (3) compile a report on programs that can be implemented to increase diversion of C&D debris; (4) post a report on the agency's website for general contractors on methods that contractors can use to increase diversion of C&D waste materials; (5) post on the agency's website a report for local governments with suggestions on programs to increase diversion of C&D waste materials. Under SB 1374, jurisdictions must also include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The model ordinance was adopted by CalRecycle on March 16, 2004.[34]

[34] *CalRecycle, Senate Bill 1374 (2002), August 24, 2018 Board Meeting, https://www2.calrecycle.ca.gov/Docs/CIWMBMeeting/Agenda/821, accessed May 2019.*

*(d) Assembly Bill 1826 – Organic Recycling*

Effective April 1, 2016, AB 1826 requires businesses that generate more than four cubic yards of organic waste (food, green and non-hazardous wood waste) per week, and multi-family properties with five units or more, to provide separate recycling bins for organic waste, and requires that local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses. Under AB 1826 all businesses that generate four cubic yards of organic waste or commercial solid waste per week shall arrange for organic waste recycling services. Effective January 1, 2020, if statewide disposal of organic waste has not been reduced to 50 percent of the level of disposal during 2014, all businesses that generate two cubic yards or more of commercial solid waste per week will be required to arrange for organic waste recycling services.

*(e) California Green Building Standards Code*

Section 4.408.1, Construction Waste Management - Mandatory measures for residential projects require developers to recycle and/or salvage for reuse a minimum of 50 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance.

Section 4.408.2, Construction Waste Management Plan - Mandatory measures for residential projects require developers to submit a construction waste management plan in conformance with Items 1 through 5. The construction waste management plan shall be updated as necessary and shall be available during construction for examination by the enforcing agency.

1. Identify the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project, or salvage for future use or sale.
2. Specify if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
3. Identify diversion facilities where the construction and demolition waste material will be taken.
4. Identify construction methods employed to reduce the amount of construction and demolition waste generated.
5. Specify that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.

Section 4.408.3, Waste Management Company - Mandatory measures for residential projects require developers to utilize a waste management company, approved by the

enforcing agency, which can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with Section 4.408.1. Note: The owner or contractor may make the determination if the construction and demolition waste materials will be diverted by a waste management company.

Pursuant to LAMC Section 99.04.408, the proposed Project shall meet a construction waste reduction of at least 50 percent. Data from CalRecycle's report, 2014 Disposal Facility – Based Characterization of Solid waste in California, shows that materials, such as organics, that decompose in landfills and generate methane comprise a significant portion of the waste stream.

### (2) Regional

#### (a) *Los Angeles County Integrated Waste Management Plan*

As with the state, each county is also required to prepare and administer a Countywide Integrated Waste Management Plan (CoIWMP). This plan is comprised of the County's and the cities' solid waste reduction planning documents, an Integrated Waste Management Summary Plan (Summary Plan), and a Countywide Siting Element (CSE). In order to assess compliance with AB 939, the Disposal Reporting System (DRS) was established to measure the amount of disposal from each jurisdiction. Comparing current disposal rates to base-year solid waste generation determines whether each jurisdiction complies with the diversion mandate.

The most recent annual report, the 2016 Annual Report, was released in September 2017. The purpose of the Annual Report is to provide an annual update to the Summary Plan and CSE. Public Works prepares the Annual Report to summarize the changes in solid waste management that have taken place since the approval of the Summary Plan and the CSE, including updated strategies to meet the long-term needs and maintain adequate disposal capacity. The CoIWMP 2016 Annual Report provides disposal analysis and facility capacities for 2016, as well as projections to the CoIWMP's horizon year of 2031.[35]

### (3) Local

#### *(a) City of Los Angeles Solid Waste Integrated Resources Plan*

Under the City's Solid Waste Integrated Resources Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting

[35] *County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2016 Annual Report, September 2017.*

90% by 2025, and becoming a zero waste city by 2030.[36] Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that would aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which would enable required reporting and monitoring of state mandated commercial and multifamily recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

As reported by the Bureau of Sanitation, the City's solid waste diversion rate for the 2013 fiscal year was 76.4 percent. The City is exceeding the state-mandated diversion goal of 50% by 2000 set by the California Integrated Waste Management Act (AB 939) of 1989.[37] The City's Sustainable City pLAn (2nd Annual Report for 2016-2017) calls for achieving 90 percent diversion by 2025 and 95 percent diversion by 2035 through on-going development of waste management infrastructure and innovative source reduction, reuse, recycling, and composting programs. These programs include Green Mulching and Composting workshops, black yard trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling, and technical assistance and support for City departments to help meet their waste reduction and recycling goals.

*(b) City of Los Angeles General Plan Framework Element - Infrastructure and Public Services Chapter*

The City of Los Angeles generates and disposes of a significant amount of solid waste both within and outside its borders. The City has implemented many programs to divert waste from disposal facilities in response to AB 939. These include source reduction programs such as home composting, recycling programs such as Curbside Recycling Program, and composting programs that produce the City's TopGro soil amendment. For these programs to succeed, the City should site businesses at appropriate locations

[36] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

[37] *City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June 14, 2005.*

within its borders that handle, process, and/or manufacture recyclable commodities to allow a full circle recycling system to develop. Recycling Market Development Zones and other Development zone areas should be utilized to bring these beneficial businesses into Los Angeles. Development and support of recyclable materials markets is one of the City's challenges in the years ahead.

For the solid waste remaining after diversion, the City will have a continuing need for solid waste transfer and disposal facilities. Currently, 26 facilities within the City have Solid Waste Facilities permits. Two are landfill disposal facilities and ten are privately operated transfer stations. The remaining are City facilities such as maintenance yards. As the capacity of the landfills located in Los Angeles is very limited, more transfer facilities will be needed to transfer waste from the collection vehicles and transport it to other, more remote landfill facilities. Capacity must be provided for the waste collected by both City agencies and private collection companies. The City, through a Request for Proposals (RFP) issued in August 1994, identified several landfill disposal facilities that may be accessed by truck and others that would require the City to ship its solid waste by train. After 2001, when both of the local facilities are projected to close, transportation costs are projected to increase the cost of waste disposal for the residents and businesses in the City.

*(c) Sustainable City pLAn*

The Sustainable City pLAn (pLAn), first adopted in 2015 and recently amended in 2019,[38] established short-term and long-term sustainability targets for the City over the next 20 years in 14 categories to strengthen and promote sustainability of the environment, economy, and equity in Los Angeles. In regards to solid waste, the City has set ambition goals to achieve zero waste, a 90 percent diversion rate by 2025. The Sustainable City pLAn establishes the following targets pertaining to solid waste:

- Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050;
- Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028;
- Eliminate organic waste going to landfill by 2028; and
- Increase proportion of waste products and recyclables productively reused and/or repurposed within L.A. County to at least 25% by 2025; and 50% by 2035.

[38] *City of Los Angeles, Sustainable City pLAn, January 2019.*

*(d) Los Angeles Municipal Code*

*(i) LA Green Plan and Green Building Code*

On December 20, 2016, the City Council approved Ordinance No. 184,692, which amended Chapter IX (Green Building Code) of the LAMC, by modifying certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CALGreen Code. Projects filed on or after January 1, 2017 must comply with the provisions of the City's Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

*(ii) Solid Waste Hauler Permit Requirements*

LAMC Section 66.32.1 requires all persons who collect, remove or transport Solid Waste, including Construction and Demolition Waste, Source-Separated Materials or Co-Mingled Recyclables, generated within the City, to obtain an AB 939 Compliance Permit from the Bureau of Sanitation. This requirement applies to construction and demolition waste generated within the City and requires that such materials are transported to a Certified Construction and Demolition Waste Processing Facility or to a facility other than a Certified Construction and Demolition Waste Processing Facility if at least two Certified Construction and Demolition Waste Processing Facilities refuse to accept the Waste and provide the Person with a rejection slip. This section does not apply to the collection, removal, or transportation of Source-Separated Material generated from a project within the City and delivered to a recycling facility or segregated for on-site recycling.

*(iii) Areas for Collecting and Loading Recyclable Materials*

Pursuant to the requirements of LAMC Section 12.21 A.19, Areas for Collecting and Loading Recyclable Materials, all new development projects shall provide adequate areas for collecting and loading recyclable materials to divert solid waste and address source reduction, recycling, and composting activities.

# b) Existing Conditions

## (1) Solid Waste Collection and Disposal

Solid waste generated within the City is disposed of at privately-owned landfill facilities throughout Los Angeles County. The management of solid waste in the City of Los Angeles involves public and private refuse collection services, as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. LA

Sanitation (LASAN) provides collection services primarily to single family residences and some multi-family residences. The City is also responsible for collecting waste from the City Hall complex, some public buildings, parks and fire stations. Multi-family residences, such as apartment complexes and condominiums, and commercial and industrial buildings within the City, contract with a private company to collect and transport their materials for disposal or recycling. Solid waste transported by both public and private haulers are either recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill.

In 2016, the most recent year for which reported data is available, the County and the cities in the County that dispose of solid waste at County landfills (including the City of Los Angeles) disposed of approximately 9.9 million tons of materials, compared to approximately 12.5 million tons in 2005, resulting in an overall reduction of approximately 2.6 million tons of solid waste. The overall reduction is due to the reduction in waste disposal at in-county facilities, likely due to the County's solid waste management efforts, markets for recyclable materials, development of alternative technology facilities, diversion credit for such facilities, and the State's 75 percent recycling goal. The 2016 average daily disposal for in-county landfills was 16,456 tpd and the maximum daily capacity was 30,449 tpd.[39]

### (2) Landfills

Solid waste disposal sites (i.e., landfills) serving the Project area are operated by the City and County of Los Angeles, as well as by private companies. In addition, transfer stations are utilized to temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or waste shed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region). Most commonly, the City of Los Angeles is serviced by the Sunshine Canyon Landfill and the Chiquita Canyon Landfill. Both landfills accept residential, commercial, and construction waste. Additionally, the Azuza Land Reclamation facility accepts inert waste, including soil and certain inert construction waste materials.

#### *(a) Sunshine Canyon City/County Landfill*

The Sunshine Canyon Landfills were located within two jurisdictions: the City of Los Angeles and the County of Los Angeles. A Solid Waste Facility Permit (SWFP) application

[39] *County of Los Angeles CoIWMP, 2016 Annual Report, Appendix E-2, Table 1, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.*

and Joint Technical Document (JTD) were prepared for submission to the Local Enforcement Agency, which approved of a joint City/County landfill operation. This was directed by the Los Angeles County Board of Supervisors in the Replacement Conditional Use Permit and the 1999 City of Los Angeles approvals. On December 31, 2008, operations in the Sunshine Canyon County Landfill and the Sunshine Canyon City Landfill were combined into one, known as the Sunshine Canyon City/County Landfill, located at Sunshine Canyon Road in Sylmar within the City of Los Angeles.

The Sunshine Canyon City/County Landfill in Sylmar is owned and operated by Republic Services, Inc. The Sunshine Canyon Landfill continues to operate for six days per week. The facility's maximum permitted daily capacity is 12,100 tons, with an annual capacity of approximately 3,775,200 tons. Approximately 2,338,681 tons of municipal solid waste had been disposed of for the year 2016. The average daily disposal tonnage is approximately 7,496 tons (based on 6 days). As of December 31, 2016, the combined Sunshine Canyon Landfill has an expected remaining lifespan of 21 years and an estimated remaining disposal capacity of 62.1 million tons of waste.

*(b) Chiquita Canyon Landfill*

The Chiquita Canyon Landfill in Santa Clarita is owned and operated by Waste Connections, Inc., and has provided the surrounding Los Angeles County area with waste disposal services for more than 30 years. In 2016, the Chiquita Canyon Landfill reached its permitted disposal limit of 23 million tons that was approved in 1997, and was granted a limited waiver to continue operation until necessary public hearings for the EIR and new CUP are completed. In July 2017, the Los Angeles County Board of Supervisors approved an annual limit intake of combined solid waste and beneficial use materials (e.g., green waste and compost) not to exceed 2,800,000 tons per year (tpy) through the year 2024, and 1,800,000 tpy through the year 2047. Based on the current conditional use permit (CUP 200400042), the overall average daily capacity of all incoming materials received for processing, disposal, and beneficial use at the facility shall not exceed 6,730 tons per day.[40] The maximum tonnage of any combination of solid waste and other materials received by the facility for processing, beneficial use materials (including composting) and disposal shall not exceed 12,000 tons on any given day, provided the monthly tonnage capacity shall not be exceeded.[41]

*(c) Unclassified Landfills*

Unclassified landfills accept C&D waste, certain green (landscaping) waste, and concrete, asphalt, and similar materials that are chemically and biologically inactive. In

[40] *http://planning.lacounty.gov/assets/upl/case/project_r2004-00559_bos-approval-package.pdf, accessed October 2018.*

[41] *Ibid.*

2016, the amount of inert waste materials disposed Countywide was 369,083 tons.[42] There is currently only one permitted Inert Waste Landfill in Los Angeles County that has a full solid waste facility permit (Azusa Land Reclamation Landfill). The facility is currently permitted to accept 8,000 tons of material per day (39,000 tons w=per week) and has projected closure date of 2045.[43]

### (3) Existing Solid Waste Generation

As shown in Table IV.J-13, below, based on the existing land uses on the Project Site, the existing solid waste generation is estimated to be 1,956 lbs/day, or 357 tpd.

**Table IV.J-13**
**Estimated Existing Solid Waste Generation**

| Land Use | Size | Solid Waste Generation Rate (lbs/unit/day) [a] | Total Solid Waste Generated (lbs/day) |
|---|---|---|---|
| Industrial (117,000 sf) | 219 emp [b] | 8.93 lbs/emp/day | 1,956 |
| **Total Existing Solid Waste Generation:** | | | **1,956** |

*Notes: sf =square feet; emp = employee*
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were projected based on 1 employee per 535 square feet of manufacturing business. Source: U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*
*Parker Environmental Consultants, 2017.*

# 3. Project Impacts

## a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact to solid waste services if it would:

***Threshold (a): Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals;***

***Threshold (b): Not comply with federal, state and local management and reduction statutes and regulations related to solid waste.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the Thresholds Guide, as appropriate, to assist in

[42] *County of Los Angeles, CoIWMP 2016 Annual Report, at page 25.*
[43] *California Solid Waste Information System (CSWIS) Facility Detail, Solid Waste Facility Permit (19-AA-0013), accessed May 2019.*

answering the Appendix G Threshold questions. The Thresholds Guide identifies the following criteria to evaluate solid waste impacts:

- *Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;*
- *Need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and*
- *Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, City of Los Angeles Solid Waste Management Policy Plan, Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.*

## b) Methodology

The proposed Project's solid waste generation was estimated utilizing the solid waste generation rates provided by the *L.A. CEQA Thresholds Guide*. The estimated solid waste generation was compared to the landfill capacity at the Sunshine Canyon Landfill to assess whether the local landfill has adequate capacity for the proposed Project in order to determine whether the proposed Project would have impacts to the local landfill capacities. Additionally, the proposed Project's consistency with federal, state and local statutes and regulations related to solid waste was analyzed.

## c) Project Design Features

There are no Project Design Features proposed to address impacts associated with solid waste impacts.

## d) Analysis of Project Impacts

***Threshold (a): Would the Project be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?***

### (1) Impact Analysis

#### *(a) Construction*

Construction of the proposed Project would generate demolition and construction debris that would need to be disposed of at area landfills and/or recycled. Construction debris includes concrete, asphalt, wood, drywall, metals, and a variety of other miscellaneous and composite materials. An estimate of the Project's construction and demolition debris

is provided in Table IV.J-14, Estimated Construction and Demolition Debris, below. The estimated debris is based on national average debris generation rates for residential and non-residential projects provided by the USEPA. As shown in Table IV.J-14, the proposed Project's demolition and construction activities are estimated to generate approximately 10,658 tons of construction and demolition debris.

**Table IV.J-14**
**Estimated Construction and Demolition Debris**

| Construction Activity | Size | Rate (lbs./sf) [a b] | Generated Waste (tons) |
|---|---|---|---|
| ***Demolition*** | | | |
| Industrial Building | 117,000 sf | 155 lbs/sf | 9,068 |
| **Total Project Demolition Debris Generation:** | | | **9,068** |
| ***Construction*** | | | |
| Multi-Family Residential | 423,872 sf | 4.39 lbs/sf | 930 |
| Commercial | 64,000 sf | 4.34 lb/sf | 139 |
| Parking Garage | 240,000 sf | 4.34 lb/sf | 521 |
| **Total Project Construction Debris Generation:** | | | **1,590** |
| **Proposed Project TOTAL (Demolition and Construction):** | | | **10,658** |

*Notes: sf = square feet; lbs = pounds*
[a] *USEPA Report No. EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[b] *United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003.*
*Source: Parker Environmental Consultants, 2018.*

Under the requirements of the hauler's AB 939 Compliance Permit from LASAN, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. The CALGreen Code prescribes mandatory measures for residential projects to recycle and/or salvage for reuse a minimum of 50 percent of the non-hazardous construction and demolition waste. Implementation of regulatory compliance measures would effectively achieve a 50-percent reduction in the proposed Project's solid waste disposal needs upon area landfills. Assuming a 50-percent reduction in construction and demolition debris, the total amount of construction and demolition debris to be disposed of at area landfills is estimated to be 5,329 tons.

The Sunshine Canyon, Chiquita Canyon and Azuza Landfills are likely disposal sites for the Project's demolition and construction debris. The Sunshine Canyon Landfill has permitted intake capacity of 12,100 tons per day. The Chiquita Canyon Landfill has a permitted daily intake capacity of 10,000 tons per day. The Azusa Reclamation Landfill facility has a permitted daily intake capacity of 8,000 tons per day. For recycling efforts, the Waste Management Downtown Diversion accept construction waste for recycling,

located approximately 8.3 miles from south of the Project Site.[44] This recycling center has a daily permitted intake of 2,500 tons per day. Clean Up America Inc. is another facility that accepts construction and demolition debris for recycling, located approximately 8.4 miles south of the Project Site.[45] Given the existing waste processing and disposal intake capacities are regional facilities, the proposed Project's construction-related solid waste impact upon the local waste recycling centers and regional landfill capacities would be less than significant. ***Construction of the proposed Project would result in a less-than-significant impact upon solid waste disposal resources.***

*(b) Operation*

Operation of the proposed Project would cause on-going generation of solid waste throughout the lifespan of the Project. The proposed Project's solid waste would be handled by private waste collection services. Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from LASAN. The proposed Project would generate approximately 3,883 pounds (1.94 tons) of solid waste per day or approximately 709 tpy (see Table IV.J-15, Estimated Operational Solid Waste Generation by Proposed Project, below). This estimate is conservative as it does not factor in the amount of solid waste being recycled as a result of implementing on-site recycling areas. The proposed Project would be required to comply with LAMC Section 12.21 A.19, which requires new development to provide an adequate recycling area or room for collecting and loading recyclable materials. Additionally, the proposed Project would be required to comply with CALGreen Code waste reduction measures for the operation of the proposed Project. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. ***Therefore, operation of the proposed Project would result in a less-than-significant impact upon solid waste disposal resources.***

[44] *Los Angeles County, Department of Public Works, Recycling Facilities in Los Angeles County, Construction and Demolition Debris, website: http://ladpw.org/epd/CD/cd_attachments/Recycling_Facilities.pdf, accessed October 2018.*

[45] *Ibid.*

**Table IV.J-15**
**Estimated Operational Solid Waste Generation by Proposed Project**

| Type of Use | Size | Solid Waste Generation Rate [a] (lbs/unit/day) | Total Solid Waste Generated (lbs/day) |
|---|---|---|---|
| **Existing Uses** | | | |
| Industrial (117,000 sf) | 219 emp [b] | 8.93 lbs/emp/day | 1,956 |
| | | ***Subtotal Existing Solid Waste Generation:*** | ***1,956*** |
| **Proposed Project** | | | |
| Multi-Family Residential | 419 du | 12.23 lbs/du/day | 5,124 |
| Office | 19,000 sf | 0.006 lbs/sf/day | 114 |
| Restaurant (3,000 sf) | 22 emp [b] | 10.53 lbs/emp/day | 232 |
| Urban Farming (42,000 sf) | 35 emp [c] | 10.53 lbs/emp/day | 369 |
| | | ***Total Project Solid Waste Generation:*** | ***5,839*** |
| | | *Less Existing Uses:* | *-1,956* |
| | | **NET TOTAL Solid Waste Generation:** | **3,883** |

*Notes: sf =square feet; du = dwelling units; emp = employees*
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were projected based on 1 employee per 535 square feet of manufacturing business, 1 employee per 134 square feet of restaurant space. Source: U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*
[c] *The Mobility Group, Bow Tie Lofts Project Traffic Study, December 23, 2016.*
*Source: Parker Environmental Consultants, 2017.*

As discussed above, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill combined have a remaining permitted intake of approximately 72.61 million tons. With the proposed expansion of the Chiquita Canyon Landfill, the regional landfill capacity would increase to 48 million tons. Based on this estimate, the additional solid waste demand generated by the proposed Project could be readily accommodated by the existing and proposed regional landfill operations without the need to expand additional operations or divert existing waste streams to alternative locations. However, because the existing landfills' capacities are finite and the overall capacity will be reduced over time, additional landfills and solutions to address the on-going regional solid waste demands of the City beyond the remaining lifespans will need to be addressed on a regional basis. Alternative landfill solutions would also need to be resolved in the near term if the Chiquita Canyon expansion plan is not approved. Regional landfill capacity and future long-term planning efforts, however, are more appropriately addressed in the cumulative impacts discussion below. For purposes of a Project-specific impact conclusion, the amount of solid waste generated by the proposed Project is within the available lifetime and daily capacities of area landfills. ***Therefore, with respect to solid waste generation and impacts on solid waste facilities, the proposed Project's operational impacts would be less than significant.***

### (2) Mitigation Measures

Project impacts related to solid waste generation would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Project impacts related to solid waste generation would be less than significant without mitigation.

***Threshold (b): Would the Project comply with federal, state and local statutes and regulations related to solid waste?***

### (1) Impact Analysis

As described above, the proposed Project's solid waste would be handled by private waste collection services. Pursuant to Section 66.32 of the LAMC, the proposed Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from LASAN. The proposed Project would be required to comply with LAMC Section 12.21 A.19, which requires new development to provide an adequate recycling area or room for collecting and loading recyclable materials. Additionally, the proposed Project would be required to comply with CALGreen Code waste reduction measures for the operation of the proposed Project. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal and recycling program. ***The proposed Project would generate solid waste that is typical of a residential mixed-use building with ground floor office and retail uses that would comply with all federal, state, and local statutes and regulations regarding proper disposal. Therefore, impacts would be less than significant.***

### (2) Mitigation Measures

Project impacts related to solid waste would be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Project impacts related to solid waste would be less than significant without mitigation.

## e) Cumulative Impacts

Development of the proposed Project, in conjunction with the 15 related projects identified in Section III, Environmental Setting, would further increase regional demands on landfill

capacity. The City of Los Angeles is primarily served by Sunshine Canyon Landfill, Azuza Reclamation Landfill, and Chiquita Canyon Landfill. The City of Glendale primarily uses the Scholl Canyon Landfill, which is not authorized to accept waste from the City of Los Angeles and thus would not be impacted by the Proposed Project. As such, the solid waste generated by the proposed Project and related projects (excluding those located in the City of Glendale), would be accommodated by these three area landfills.

The Scholl Canyon Landfill is owned by the City of Glendale and County of Los Angeles and operated by the County Sanitation District No. 2 of the Los Angeles County. The Scholl Canyon Landfill continues to operate for six days per week. The facility's maximum permitted daily capacity is 3,400 tons, with an annual capacity of approximately 1,060,800 tons. Approximately 350,216 tons of municipal solid waste had been disposed of for the year 2016. The average daily disposal tonnage is approximately 1,122 tons (based on 6 days). As of December 31, 2016, the Scholl Canyon Landfill has an expected remaining lifespan of 14 years and an estimated remaining disposal capacity of 4.08 million tons of waste. In 1987, the City of Glendale implemented a defined waste shed area that limited the surrounding cities that could utilize the Scholl Canyon Landfill. The purpose was to provide access to those agencies which did not have a landfill within their own jurisdiction. As the City of Los Angeles had multiple options for utilizing landfills in their own City, they were not included as part of the waste shed area.

## (1) Impact Analysis

### *(a) Landfill Capacity*

Although it is impossible to calculate future solid waste generation related to growth in the Los Angeles region, at present, the impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the Sunshine Canyon and Chiquita Canyon Landfills, which have a combined remaining annual capacity of 5.5 million tpy through 2037 and 2047, respectively. Furthermore, although there are several proposals for new landfills in the region, there are currently few viable options for solid waste. The proposed Project would contribute approximately 1.94 tons of solid waste per day (709 tpy) to the Sunshine Canyon Landfill and/or Chiquita Canyon Landfill, which represents well under one percent of the current excess remaining annual capacities of either landfill. The total solid waste generation by the proposed Project and the related projects would be approximately 15,228 pounds per day or approximately 3,614 tpy (see Table IV.J-16, Estimated Cumulative Solid Waste Generation, below.), which represents approximately 0.07 percent of the remaining annual capacity for the Sunshine and Chiquita Canyon landfills through year 2047. ***Because this increase is negligible in relation to the region as a whole, and solid waste disposal solutions are continuously being sought after on the regional level, the proposed Project's***

**Table IV.J-16**
**Estimated Cumulative Solid Waste Generation**

| Type of Use | Size [a] | Solid Waste Generation Rate (lbs/unit/day) [b] | Total Solid Waste Generation (gpd) |
|---|---|---|---|
| **Related Projects** | | | |
| ***City of Los Angeles*** | | | |
| Multi-Family Dwelling Units | 766 du | 12.23 lbs/du/day | 9,368 |
| Church | 85,631 sf | 0.006 lbs/sf/day | 514 |
| Coffee shop / Donut Shop (1,000 sf) | 14 emp | 10.53 lbs/emp/day | 147 |
| Restaurant (3,760 sf) | 38 emp | 10.53 lbs/emp/day | 400 |
| Retail (30,457 sf) | 80 emp | 10.53 lbs/emp/day | 842 |
| Elementary and Middle Schools (450 students) [c] | 9,000 sf | 0.007 lbs/sf/day | 63 |
| High School (200 students) [c] | 4,000 sf | 0.007 lbs/sf/day | 28 |
| Childcare (175 students) [c] | 6,125 sf | 0.007 lbs/sf/day | 43 |
| *Related Projects within the City of Los Angeles Wastewater Generation Subtotal* | | | *11,405* |
| Total Project Solid Waste Generation: | | | 3,883 |
| **TOTAL CUMULATIVE:** | | | **15,288** |

*Notes: sf =square feet; du = dwelling units; emp = employees*
*- Uses not listed are estimated by the closest type of use available in the table.*
*- Solid waste generation from Related Project No. 15 was assumed to be zero.*
*[a] Conversions of floor area per employee based on California Building Code (2013), Ch.10, Table 1004.1.2.*
*[b] L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill, or City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981, where applicable.*
*[c] Assumes 20 sf per student and 35 sf per childcare student.*
*Parker Environmental Consultants, 2018.*

***contribution to cumulative impacts would not be considerable and would be less than significant.***

*(b) Statutes and Regulations*

As with the proposed Project, related projects would participate in federal, state, regional, and local source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. Although there is currently adequate capacity to accommodate the cumulative disposal needs of the proposed Project and related projects, continued capacity is an increasing regional concern. Solutions to resolve the regional solid waste disposal needs are continuously being investigated at the state, regional, and local levels. ***Nevertheless, since there is currently adequate capacity to accommodate the cumulative disposal needs of the proposed Project and related***

***projects, cumulative impacts with respect to solid waste would be less than significant.***

### (2) Mitigation Measures

Cumulative impacts related to solid waste would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Cumulative impacts related to solid waste would be less than significant without mitigation.

# V. Environmental Impact Analysis

# J.4 Utilities and Service Systems – Electric Power, Natural Gas and Telecommunications Infrastructure

## 1. Introduction

The following section analyzes the proposed Project's potential impacts upon electric power, natural gas and telecommunications infrastructure. This section focuses on the existing infrastructure serving the project area and the potential for environmental impact to occur as a result of any physical improvements that may be necessary to accommodate the proposed Project. The information presented in this section is based in part on the information provided by the City of Los Angeles Department of Water and Power[46] and the Utility Infrastructure Report provided in Appendix P to this EIR. Potential impacts associated with energy demand and energy conservation polices are discussed in Section IV.O, Energy.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) Federal

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation, domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

[46] *City of Los Angeles, Department of Water and Power, Response to Request for Water and Electric Connection Services, February 7, 2017 (see Appendix I to this EIR).*

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

### (2) State

California energy infrastructure policy is governed by three institutions: the California Independent System Operator (California ISO), the California Public Utilities Commission (CPUC), and the California Energy Commission (CEC). These three agencies share similar goals, but have different roles and responsibilities in managing the State's energy needs. The majority of state regulations with respect to electricity and natural gas pertain to energy conservation. For a discussion of these regulations, refer to Section IV.O, Energy, of this Draft EIR. There are, however, regulations pertaining to infrastructure. These are discussed further below.

#### *(a) California Independent System Operator*

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

#### *(b) California Public Utilities Commission*

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE), Southern California Gas Company (SoCalGas), and San Diego Gas and Electric (SDG&E). Public owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUCs jurisdiction. The Digital Infrastructure and Video Competition Act of 2006 (DIVCA) established the CPUC as the sole cable/video TV franchising authority in the State of California. DIVCA took effect January 1, 2007.

The CPUC is overseen by five commissioners appointed by the Governor and confirmed by the state Senate. The CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines and permitting of electrical transmission and substation facilities.

*(c) California Energy Commission*

The CEC is a planning agency which provides guidance on setting the state's energy policy. Responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the state, developing renewable energy resources and permitting thermal power plants 50 megawatts and larger. The CEC also has regulatory specific regulatory authority over publicly owned utilities to certify, monitor and verify eligible renewable energy resources procured.

*(d) Senate Bill 1389*

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. In 2018, the CEC decided to write the Integrated Energy Policy Report in two volumes. The Volume I, which was published on August 1, 2018, highlights the implementation of California's innovative polices and the role they have played in moving toward a clean energy economy. Volume II, which was adopted in February 2019, identifies several key energy issues and actions to address these issues and ensure the reliability of energy resources.[47]

### (3) Local

The City of Los Angeles Information Technology Agency (ITA) is responsible for a broad spectrum of services related to technology services to both internal and external customers. These range from classic IT services, such as computer support, enterprise applications, data networks, and a 24/7 data center to progressive digital services, such as a TV station (LACityview), 3-1-1 Call Center, public safety radio/microwave communications, helicopter avionics, enterprise social media, and more.

ITA's Video Services Regulatory Division advises the Mayor and City Council on certain issues relating to video/cable TV services and private telecommunications franchises. The Division regulates and monitors the compliance of video/cable TV services and franchises issued by the CPUC. More specifically, it ensures that video/cable TV service

[47] *2018 Integrated Energy Policy Report Updated, Volume II, February 2019.*

providers comply with local, state and federal laws and oversees the video/cable TV service interests of City residents.

## b) Existing Conditions

### (1) Electric Power

The Los Angeles Department of Water and Power's (LADWP) power system serves approximately 4 million people and is the nation's largest municipal utility. Its service territory covers the City of Los Angeles and many areas of the Owens Valley, with annual sales exceeding 24 million megawatt-hours (MWh). LADWP is a "vertically integrated" utility, both owning and operating the majority of its generation, transmission and distribution systems. LADWP strives to be self-sufficient in providing electricity to its customers and does so by maintaining generation resources that are equal to or greater than its customers' electrical needs.

The LADWP currently provides electricity to the Project area with all required infrastructure present. There is an overhead 4.8-kilovolt (kV) line and an overhead 34.5-kV line along Casitas Avenue adjacent to the Project Site.[48] As discussed in further detail in Section IV.O, Energy, based on the existing land use on the Project Site the existing electricity demand is approximately 1,298,700 kilowatt-hours per year (kWh/year).

### (2) Natural Gas

The Southern California Gas Company (SoCalGas), a subsidiary of Sempra Energy (the nation's largest natural gas supplier), provides natural gas to the City of Los Angeles through existing gas mains located under the streets. Natural gas service is provided in accordance with the SoCalGas' policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual agreements are made. The availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SoCalGas is under the jurisdiction of the CPUC but can also be affected by actions of federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which service is available, gas service would be provided in accordance with those revised conditions.

The Project Site is currently developed with a light manufacturing facility and has access to existing gas mains connecting the property to a natural gas supply. As discussed in further detail in Section IV.O, Energy, based on the existing land uses presently being occupied on the Project Site, the existing natural gas demand is estimated to be

[48] *City of Los Angeles Department of Water and Power, Water and Electric Connection Services Request, February 2, 2017 (see Appendix I, Public Service Letters).*

2,117,700 kbtu per year (cf/year) or approximately 173,015 cubic feet per month (cf/month).

#### (3) Telecommunications

Prior to 2006, the City of Los Angeles had 14 cable television franchise areas that were served by three incumbent cable operators; Time Warner, Cox, and Charter. The City had provided cable television franchising regulatory authority of its cable television operators for over 30 years. Through City-issued franchises and enforcement of relevant ordinances, the City oversaw these cable television operators in the areas of consumer services and financial payments to the City, technical compliance with all local, state and federal laws, and Public, Educational, and Governmental (P.E.G.) Access support. In 2006, the California Public Utilities Code was amended under state law and ceded the City's cable television franchising rights to the California Public Utilities Commission. In 2007 and 2008, Verizon and AT&T began operating in the City. Currently, the City's incumbent cable and video TV providers are AT&T, Charter/Spectrum, Cox Communications, Frontier, and Race Communications.

# 3. Environmental Impacts

## a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to energy systems if it would:

***Threshold a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects;[49]***

For this analysis, the Appendix G Threshold listed above is 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 question. The

[49] *This section of the EIR focuses on impacts associated with electric power, natural gas, and telecommunications systems. With respect to impacts upon water supply and water conveyance facilities, see Section IV.J-1, Water, above. With respect to impacts upon wastewater treatment facilities, see Section IV.J-2, Wastewater, above. With respect to stormwater drainage impacts, this issue was concluded to be less than significant and dismissed from further analysis in the Initial Study (See Initial Study Checklist Question IX(c) in Appendix A to this Draft EIR and Section VI, Other CEQA Considerations).*

L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to energy infrastructure:

- Would the project result in the need for new (off-site) energy supply facilities, or major capacity enhancing alterations to existing facilities?

## b) Methodology

This analysis evaluates the potential impacts of the proposed Project on existing electric, natural gas and telecommunications infrastructure by comparing the estimated Project demand with the available capacity. A will-serve letter from LADWP's Metropolitan Service Planning division is included in Appendix P of this Draft EIR demonstrates the availability of sufficient electric resources to supply the Project's demand. A will-serve letter from Time Warner Cable is included in Appendix P of this Draft EIR confirming service availability from adjacent poles or underground in the vicinity of the Project Site.

## c) Project Design Features

No specific project design features are proposed with regard to energy infrastructure. However, as noted in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, natural gas-fueled fireplaces would be prohibited in the residential units. (See GHG-PDF-2 in Section IV.D, Greenhouse Gas Emissions.)

## d) Analysis of Project Impacts

***Threshold (a):*** ***Would the project require or result in the relocation or construction of electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

### (1) Impact Analysis

#### *(a) Electric Power*

During Project construction, electricity would be consumed, on a limited basis, to power lighting of the Project Site and the temporary operation of an approximate 1,000 square foot construction trailer. Electricity would also be used indirectly for the treatment and conveyance of water used during construction for fugitive dust control. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. The total estimated electricity use from construction activities is 25,915 kilowatt-hours (kWh) (see Table IV.O-4, in Section IV.O, Energy). The energy demands during construction would be less than the demand

generated by the existing uses and thus would not necessitate additional energy facilities or distribution infrastructure.

As further discussed in Section IV.O, Energy, the proposed Project would be able to connect to and would be served by the existing power grid serving the Project Site. The estimated net increase in electricity demand by the proposed Project is estimated to be approximately 1,337,720 kWh/year (see Table IV.O-5, in Section IV.O, Energy). A will-serve letter from LADWP's Metropolitan Service Planning division is included in Appendix P of this Draft EIR demonstrates the availability of sufficient electric resources to supply the Project's demand. Establishing electric power service to the proposed Project would involve disconnecting existing power connections and establishing new connections to serve the proposed structures. Such improvements would be localized in nature and would include service connections to overhead power poles and/or existing underground transformers. ***Thus, the proposed Project would not require or result in the relocation or construction of electric power facilities which could cause significant environmental effects, and impacts would be less than significant***.

*(b) Natural Gas*

The proposed Project would increase demand for natural gas service on the Project Site. As discussed in further detail in Section IV.O, Energy, the proposed Project's net natural gas demand is estimated to be approximately 3,372,230 kbtu/year, or approximately 275,509 cf/month. As natural gas service is currently supplied to the Project Site, the site is accessible to existing service lines. Establishing natural gas service to the proposed Project would involve disconnecting existing connections and establishing new connections to serve the proposed structures. Such improvements would be localized in nature and would involve minimal trenching to access natural gas utility lines on or adjacent to the Project Site. ***As such, the proposed Project would not require or result in the relocation or construction of natural gas facilities which could cause significant environmental effects, and impacts would be less than significant***.

*(c) Telecommunications Systems*

As discussed above, telecommunication services within the City of Los Angeles is currently provided by several commercial service providers, including AT&T, Charter/Spectrum, Cox Communications, Frontier, and Race Communications. The Project Site is currently developed with an operational warehouse/light manufacturing/film production use, and is served by existing telecommunications infrastructure. Establishing service to the proposed Project would involve disconnecting existing connections and establishing new connections to the proposed structure. Such improvements would be localized in nature and would utilize existing conduit and service lines. ***Thus, the***

***proposed Project would not require or result in the relocation or construction of telecommunication facilities which could cause significant environmental effects, and impacts would be less than significant***.

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Impact After Mitigation

Project impacts related to electric power, natural gas, or telecommunication systems would be less than significant without mitigation.

## e) Cumulative Impacts

### (1) Impact Analysis

Based on the analysis provided above, the proposed project is currently adequately served by existing electric power, natural gas, and telecommunications facilities, and the development of the proposed Project would require localized utility connections to accommodate the proposed development. Similar to the proposed Project, the related projects are located on infill development lots that are currently served by existing infrastructure, or are located adjacent to properties or right-of-way facilities that would accommodate utility hook-ups without resulting in significant environmental impacts. The proposed Project's contribution to cumulative impacts related to electric power, natural gas, or telecommunications systems would not result in a cumulatively considerable effect related to available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electric power and natural gas facilities, the construction of which could cause significant environmental effects. ***As such, the Project's impacts would not be cumulatively considerable; therefore, cumulative energy infrastructure impacts under Threshold (a) are concluded to be less than significant.***

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Impact After Mitigation

Project-level and cumulative impacts related to electric power, natural gas, or telecommunication systems would be less than significant without mitigation.

# Environmental Impact Analysis

# K. Traffic/Transportation

## 1. Introduction

The following section summarizes and incorporates by reference the information provided in the 2800 Casitas Project – VMT Analysis ("VMT Analysis"), prepared by The Mobility Group, dated November 22, 2019. The scope of and methodology for this analysis were determined in conjunction with the City of Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines adopted on July 30, 2019 pursuant to the amended California Environmental Quality Act (CEQA) Guidelines as directed under Senate Bill (SB) 743. The VMT Analysis and LADOT's approval letter are provided in Appendix J.1 to this Draft EIR.

On August 16, 2017, the Department of Transportation (DOT) issued a traffic assessment report to the Department of City Planning on the proposed mixed-use project located at 2750-2800 Casitas Avenue. However, subsequent to the release of this report, on July 30, 2019, pursuant to Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the State's California Environmental Quality Act (CEQA) Guidelines, the City of Los Angeles adopted vehicle miles traveled (VMT) as the criteria by which to determine transportation impacts under CEQA. Therefore, in response to this action the following EIR Section is based on the current Appendix G CEQA Thresholds and appropriately incorporates the VMT analysis for the proposed Project. The previous Traffic Study that was submitted to and approved by LADOT, dated May 19, 2017, along with LADOT's correspondence letter acknowledging their review and approval of the Traffic Study (DOT Case No. CEN 17-45791), dated August 16, 2017, are contained in Appendix J.2 to this Draft EIR and are presented for informational purposes as a non-CEQA component of the Proposed Project. The impacts shown in this analysis are not considered to be significant impacts under CEQA.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) Senate Bill 743

California Senate Bill 743 (SB 743), which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under the California Environmental Quality Act (CEQA).

Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement, vehicle miles traveled (VMT), that addresses the state's goals on reduction of greenhouse gas (GHG) emissions, creation of a multi-modal transportation network, and promotion of compact, mixed-use development patterns. Fully implemented guidelines were originally scheduled to be in place by January 1, 2016. However, an extension has allowed lead agencies until July 1, 2020 to establish an analysis methodology.

On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. Caltrans is also pursuing VMT as a metric of project impacts to better align with the state's multi-modal transportation and environmental actions goals, which is outlined in an interim guide, but currently has no specific adopted methodology.[1]

#### (2) Southern California Association of Government's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

On April 2016, the Southern California Association of Governments (SCAG) adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). The 2016-2040 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Furthermore, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016-2040 RTP/SCS, SB 375 requires SCAG and other Metropolitan Planning Organizations throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning.[2] Within the 2016 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service

[1] *Caltrans, Local Development – Intergovernmental Review Program Interim Guide, approved September 2016.*

[2] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p 166, adopted April 2016.*

frequency during peak commute hours.[3] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.[4] The Project Site is not located within an HQTA as designated by the 2016-2040 RTP/SCS. Please refer to Section IV.F, Land Use and Planning, for a detailed discussion of the applicable provisions of the 2016-2040 RTP/SCS that apply to the Project.

#### (3) City of Los Angeles General Plan Framework Element and Mobility Plan 2035

The City of Los Angeles General Plan Framework Element (Framework Element) sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use. The goals, objectives, policies, and related implementation programs of the Framework Element's Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999.

In August 2015, the City Council initially adopted Mobility Plan 2035 (Mobility Plan), which is an update to the Transportation Element. The City Council readopted the Mobility Plan on September 7, 2016, and may consider additional amendments.[5] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. Each of the goals contains objectives and policies to support the achievement of those goals. Refer to Section IV.F, Land Use and Planning, of this Draft EIR for a discussion of the Project's consistency with the Transportation Chapter of the Framework Element and Mobility Plan.

Street classifications/standards are designated in the Transportation Element of the City of Los Angeles General Plan. The Mobility Plan has modified the above street standards to create a better balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access. Roadways are now defined as follows in the Mobility Plan:

- Freeways - High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.

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[3] *Ibid, p. 189.*

[4] *Ibid, p. 189.*

[5] *Los Angeles Department of City Planning, Mobility Plan 2035, An Element of the General Plan, approved by the City Planning Commission on June 23, 2016 and adopted by City Council on September 7, 2016.*

- Arterial Streets - Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
  - Boulevards represent the widest streets that typically provide regional access to major destinations and include two categories:
    - Boulevard I provides up to four travel lanes in each direction with a target operating speed of 40 mph.
    - Boulevard II provides up to three travel lanes in each direction with a target operating speed of 35 mph.
  - Avenues pass through both residential and commercial areas and include three categories:
    - Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.
    - Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.
    - Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.
- Collector Streets - Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.
- Local Streets - Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane in each direction with a target operating speed of 15 to 20 mph. Local Streets can be continuous local streets that connect to other streets at both ends, or non-continuous local streets that lead to a dead-end.

#### (4) City of Los Angeles Municipal Code

##### *a) Construction Traffic*

With regard to construction traffic, Section 41.40 of the Los Angeles Municipal Code (LAMC) limits construction activities to the hours from 7:00 A.M. to 9:00 P.M. on weekdays and from 8:00 A.M. to 6:00 P.M. on Saturdays and national holidays. No construction is permitted on Sundays.

*b) Parking*

Section 12.21.A.4 of the LAMC sets forth parking requirements for development projects based on the types and density of land uses. The Project's proposed uses would be subject to the applicable parking requirements set forth in LAMC Section 12.21.A.4(b), as discussed in further detail in Section IV, F, Land Use and Planning.

# b) Existing Conditions

## (1) Project Site

The Project Site is generally bounded by Glendale Freeway (SR- 2) to the north and west, the Los Angeles River to the south, and the Metro-Owned railroad easement to the east. The Project Site is located just north of the I-5 / SR-2 interchange in the Glassell Park / Atwater Village area of Los Angeles. Primary regional access to the general area of the Project Site is provided by the Glendale Freeway (SR-2) and the Golden State Freeway (I-5). The Glendale Freeway runs in a north-south direction and is located northwest of the Project Site. The Golden State Freeway runs in a north-south direction and is located southwest of the Project Site. The Project Site is not located in the City of Los Angeles High Injury Network[6]. The key surface streets serving the Project area are described below.

## (2) Roadway System

*(a) North-South Streets*

Glendale Boulevard: Glendale Boulevard is a two-way street providing two travel lanes in each direction to the west of the Project Site. It is classified as an Avenue II under the City of Los Angeles Mobility Plan 2035 (Mobility Plan 2035). On-street parking is provided with some restrictions.

Riverside Drive: Riverside Drive is a two-way street providing two travel lanes in each direction to the west of the Project Site. It is classified as an Avenue I under Mobility Plan 2035. On-street parking is provided with some restrictions.

San Fernando Road: San Fernando Road is a two-way street providing two travel lanes in each direction to the east of the Project Site. It is classified as an Avenue I under Mobility Plan 2035. On-street parking is not permitted.

[6] *The High Injury Network is part of LADOT's Vision Zero Action Plan to promote safe streets throughout the City. It is comprised of collision data on 386 corridors and serves as a reference for targeted engineering, enforcement and education efforts to focus on highest need locations and to allow for practical project delivery.*

*(b) East-West Streets*

Fletcher Drive: Fletcher Drive is a two-way street providing two travel lanes in each direction to the north of the Project Site. It is classified as an Avenue II under Mobility Plan 2035. On-street parking is provided with some restrictions.

*(c) Project Site Access*

The Project is located on Casitas Avenue south of Fletcher Drive. Casitas Avenue does not connect directly to but rather passes over Fletcher Drive due to the Fletcher Drive overcrossing of the railroad. The Casitas Avenue overcrossing connects to Fletcher Drive west of Casitas Avenue via slip roads but not to the east. The streets between Fletcher Drive and the Project Site are described below.

Casitas Avenue: Casitas Avenue a two-way street providing one travel lane in each direction. It is classified as a Local Street under Mobility Plan 2035. On-street parking is not permitted south of Carillon Street, but parking is provided with some restrictions north of Carillon Street.

Carillon Street: Carillon Street a two-way street providing one travel lane in each direction. It is classified as a Local Street under Mobility Plan 2035. It runs from Casitas Avenue to Larga Avenue, and connects to other north south local streets. On-street parking is not permitted on the south side of the street, but parking is permitted on the north side of the street.

La Clede Avenue: La Clede Avenue is a two-way street providing one travel lane in each direction and provides access between Carillon Street and Fletcher Drive. The intersection of La Clede Avenue and Fletcher Drive is signalized. It is classified as a Local Street under Mobility Plan 2035. On-street parking is provided with some restrictions.

Perlita Avenue: Perlita Avenue is a two-way street providing one travel lane in each direction and provides access between Carillon Street and Fletcher Drive. The intersection of Perlita Avenue and Fletcher Drive is unsignalized. It is classified as a Local Street under Mobility Plan 2035. On-street parking is provided without restrictions.

Atwater Avenue: Atwater Avenue is a two-way street providing one travel lane in each direction and provides access between Carillon Street and Fletcher Drive. The intersection of Atwater Avenue and Fletcher Drive is unsignalized. It is classified as a Local Street under Mobility Plan 2035. On-street parking is provided without restrictions.

Larga Avenue: Larga Avenue is a two-way street providing one travel lane in each direction in the vicinity of the Project Site. The intersection of Larga Avenue and Fletcher Drive is signalized. It is classified as a Collector Street north of Fletcher Drive and a Local

Street south of Fletcher Drive under Mobility Plan 2035. On-street parking is provided with some restrictions.

### (3) Existing Public Transportation

The Project area is currently served by a total of five local and inter-city transit operators including one Metro Rapid bus line (794), four Metro Local Bus lines (90, 91, 94, and 96) and one Metro Circulator Bus line (603). Table IV.K-1 lists the individual bus and rail lines serving the Project area and indicates the frequency of service (i.e., headways) during the a.m. and p.m. peak hours.

**Table IV.K-1**
**Existing Public Transit Services**

| Route | Description | Approximate Headway (minutes) | |
|---|---|---|---|
| | | AM Peak | PM Peak |
| *Metro Rapid* | | | |
| 794 | Downtown Los Angeles - Sylmar with stops on San Fernando Road | 20 | 20 |
| *Metro Local* | | | |
| 90/91 | Downtown Los Angeles – Sylmar with stops on San Fernando Road and Glendale Boulevard | 17 | 20 |
| 94 | Downtown Los Angeles – Sun Valley with stops on San Fernando Road | 20 | 24 |
| 96 | Downtown Los Angeles – Burbank with stops on Fletcher Drive and San Fernando Road | 30 | 30 |
| *Metro Circulator* | | | |
| 603 | Downtown Los Angeles – Glendale with stops on Fletcher Drive and San Fernando Road | 15 | 10 |
| *Source: The Mobility Group, Bow Tie Lofts Project, Traffic Study, May 19, 2017.* | | | |

### (4) Existing Bicycle and Pedestrian Facilities

The Project Site is located on Casitas Avenue, which terminates in a cul-de-sac at the Project Site, and there is no public through access south of the Project Site. Casitas Avenue is improved with a ten-foot sidewalk on the west side and a five-foot sidewalk on the east side, with a single shared driveway providing vehicular, bicycle and pedestrian access to the Project Site. The property south of the Project Site is the vacant Bowtie parcel, which is planned to be developed as public park in the future. Pedestrian access to the park site is currently unpaved and unimproved.

Bicycle facilities are similarly limited in the vicinity of the Project Site, although a number of improvements are planned or under construction. A dedicated bike path exists on the opposite side of the L.A. River, most easily accessible from the Project Site at Fletcher Drive, approximately 1 mile to the northeast. The Los Angeles River bicycle path is a

Class I bicycle and pedestrian path in the Greater Los Angeles area, running from north to east along the Los Angeles River through Griffith Park in an area known as the Glendale Narrows. The 7.4 mile section of bikeway through the Glendale Narrows is known as the Elysian Valley Bicycle & Pedestrian Path.

Additional bike and pedestrian facilities are also planned or under construction in the vicinity of the Project Site, most of which are part of the L.A. River Master Plan, a 25-50 year blueprint for a 32-mile stretch of the river that includes parks, walkways, and bike paths. The Taylor Yard Bikeway/Pedestrian Bridge Over the Los Angeles River Project, located approximately 1 mile to the south of the Project Site, is currently under construction and upon completion will connect Elysian Valley and Cypress Park across the Los Angeles River.

# 3. Project Impacts

## a) Thresholds of Significance

In accordance with Appendix G to the state *CEQA Guidelines*, the proposed Project would have a significant impact on traffic or transportation if it would cause any of the following conditions to occur:

***Threshold a)*** ***Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;***

***Threshold b)*** ***Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).***

***Threshold c)*** ***Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or***

***Threshold d)*** ***Result in inadequate emergency access.***

## b) Methodology

The State of California Office of Planning and Research updated Appendix G of the State CEQA Thresholds which establishes new criteria for analyzing traffic impacts based on vehicle miles traveled in lieu of the level of service methodology in January 2019. Pursuant to Section 15064.3(c), the provisions of this section apply statewide beginning on July 1, 2020. The Traffic Study was completed in May 2017, and LADOT issued their correspondence of approval on August 16, 2017. Subsequent to LADOT's review and approval of the Traffic Study, the City Council adopted the LADOT Transportation Assessment Guidelines (TAG) which includes the updated CEQA methodology and

significance thresholds as directed under SB 743 on July 30, 2019. To address the new VMT methodology, a VMT analysis was conducted in September 2019.[7] Accordingly, the following analysis addresses the proposed Project's traffic impacts utilizing VMT methodology, as discussed below. The May 2017 Traffic Study is provided in Appendix J.2 for informational purposes as a non-CEQA analysis.

### (1) Plan Consistency

The City of Los Angeles has adopted programs, plans, ordinances and policies that establish the transportation planning framework for all travel modes. The overall goals of these policies are to achieve a safe, accessible and sustainable transportation system for all users. LADOT's updated Transportation Assessment Guidelines identified titles of key City plans and policies, and their web links, that shall be reviewed for consistency to the extent they area applicable to a specific project.

The threshold test is to assess whether a project would conflict with an adopted program, policy, plan, or ordinance that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. Conversely, a project would not be shown to result in an impact merely based on whether a project would not implement a particular program, plan, policy, or ordinance. Many of these programs must be implemented by the City itself over time, and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans and policies. A project that generally conforms with, and does not obstruct, the City's development policies and standards will generally be considered to be consistent. To help guide whether a project conflicts with the City's circulation system policies, the LADOT's Transportation Assessment Guidelines provides a list of screening questions to assist in identifying key policy documents that may be relevant to a project. The screening table and applicable plan consistency analysis is provided under the Project Impacts heading below, in response to Threshold Question a.

### (2) VMT Thresholds

LADOT has developed a VMT Calculator tool to assess a project's impacts under the VMT methodology. For the purpose of determining whether a VMT analysis is required, a proposed project's daily vehicle trips should be estimated using the VMT Calculator tool or the most recent edition of the ITE Trip Generation Manual. If existing land uses are present on the Project Site or there were previously terminated land uses that meet the criteria for trip credits described in the trip generation methodology discussion below, the

[7] *The VMT Analysis, prepared by The Mobility Group, dated September 23, 2019 is provided in Appendix J.1 to this EIR.*

daily vehicle trips generated by the existing or qualified terminated land uses can be estimated using the VMT calculator and subtracted from the Project's daily vehicle trips to determine the net increase in daily vehicle trips.

In accordance with these provisions, the proposed Project is expected to generate a net increase of 2,009 daily trips and thus a project VMT analysis is required. The summary results of the Project screening are provided in Table IV.K-2, below. The VMT Calculator results for existing trips are shown in Appendix J.1 to this EIR.

**Table IV.K-2**
**VMT Methodology Trip Generation Project Screening**

| | Land Use | Scale | Daily Trips |
|---|---|---|---|
| **Proposed** | Multi-Family | 419 DU | -- |
| | Office | 19,000 sf | -- |
| | High-Turnover Sit Down Restaurant | 3,000 sf | |
| | Urban Farm/Light Industrial | 42,000 sf | -- |
| | ***Subtotal*** | | ***2,899*** |
| **Existing** | Manufacturing | 87,000 sf | -- |
| | Warehousing | 30,000 sf | -- |
| | ***Subtotal*** | | ***360*** |
| | | **Net Difference [Proposed – Existing]** | **2,539** |
| | | **Analysis Required [net Difference > 250]** | **YES** |

*Source: The Mobility Group, 2800 Casitas Project - VMT Analysis, November 22, 2019. (See Appendix J.1 to this EIR)*

The LADOT VMT Calculator measures Household VMT per Capita, and Work VMT per Employee. LADOT has identified thresholds for significant VMT impacts by sub-area of the City. For this area of the City (the Central Area Planning Commission area) the following thresholds have been identified:

Household VMT per Capita: 7.2
Work VMT per Employee: 12.7

## c) Project Design Features

The following traffic-related project design features (PDF)s are proposed to be implemented as part of the proposed Project.

**TRANS-PDF-1** The Applicant shall, prior to construction, develop a Construction Traffic Control/Management Plan (the "Plan") to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties.

**TRANS-PDF-2** All construction related traffic shall be restricted to off-peak hours.

**TRANS-PDF-3** The Applicant shall install informational traffic signs within the Project Site in accordance with the applicable provisions of LAMC Section 14.4 to ensure pedestrian and vehicular safety during project operations.

**TRANS-PDF-4** The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases except when it is absolutely required to close or block sidewalks for construction staging. Sidewalks shall be reopened as soon as reasonably feasible taking construction and construction staging into account. This requires the Applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

# d) Analysis of Project Impacts

***Threshold a) Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

## (1) Impact Analysis

### *(a) Screening Questions*

In accordance with LADOT's Traffic Assessment Guidelines (July 2019), a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent. Table IV.K-3, below, provides responses to the list of policy related questions, as recommended by LADOT, in order to help determine whether the project conflicts with the City's circulation system policies. If the answer is yes to a question, an analysis of the Project's consistency with the corresponding policy may be warranted.

**Table IV.K-3**
**Screening Questions to Determine Whether Analysis of Project Consistency with Plans, Policies and Programs is Warranted**

| # | Guiding Questions | Response |
|---|---|---|
| | ***Existing Plan Applicability*** | |
| 1 | Does the Project include additions or a new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned R3 or less restrictive zone? | **No.** The Project Site has frontage directly on Casitas Avenue, which is classified as a Local Street under the Mobility Plan 2035. |
| 2 | Is the Project Site along any network identified in the City's Mobility Plan? | **No.** The Project Site is not along any network identified in the Mobility Plan 2035. |
| 3 | Are dedications or improvements needed to serve long-term mobility needs identified in the Mobility Plan 2035? | **No.** No street dedications or off-site improvements are required by the proposed Project to serve long-term mobility needs identified in the Mobility Plan 2035. |

| | | |
|---|---|---|
| 4 | Does the Project require placement of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program? | **No.** The proposed Project is not located along a transit route and would not require placement of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program. |
| 5 | Is the Project Site in an Identified Transit Oriented Community? | **No.** The Project Site is not located in a Transit Priority Area (TPA). As such, the proposed Project is not eligible for or seeking any density or entitlement incentives available for Project's that are within TOC areas. |
| 6 | Is the Project Site on a roadway identified in the City's High Injury Network? | **No.** The Project Site has frontage directly on Casitas Avenue, which is not identified in the City's High Injury Network. |
| 7 | Does the Project propose repurposing existing curb space? (Bike corral, car-sharing, parklet, electric vehicle charging, loading zone, curb extension, etc.) | **No**. The Project does not propose repurposing existing curb space. |
| 8 | Does the Project propose narrowing or shifting existing sidewalk placement? | **No**. The Project does not propose narrowing or shifting existing sidewalks. |
| 9 | Does the Project propose paving, narrowing, shifting or removing an existing parkway? | **No**. The Project does not proposed modification of an existing parkway. |
| 10 | Does the Project propose modifying, removing, or otherwise affect existing bicycle infrastructure (ex: driveway proposed along street with bicycle facility) | **No**. The Project will not modify, remove, or otherwise affect existing bicycle infrastructure. |
| 11 | Is the Project Site adjacent to an alley? If yes, will the Project make use of, modify, or restrict alley access? | **No**. The Project Site is not adjacent to an alley. |

| | | |
|---|---|---|
| 12 | Does the Project create a cul-de-sac or is the Project Site adjacent to an existing cul-de-sac? If yes, is the cul-de-sac consistent with design goal in Mobility Plan 2035 (maintain through bicycle and pedestrian access)? | **Yes**. The Project Site is located adjacent to an existing cul-de-sac. Casitas Avenue terminates at the Project Site. The consistency of the cul-de-sac's design with the applicable provisions of the Mobility Plan is discussed below. |
| | ***Access: Driveways and Loading*** | |
| 13 | Does the Project Site introduce a new driveway or loading access along an arterial (Avenue or Boulevard)? | **No**. The proposed Project would remove and reconstruct the existing driveway in the same location on Casitas Avenue, which is a designated local street. The Project would not introduce a new driveway or loading access along an arterial. |
| 14 | If yes to 13, Is a non-arterial frontage or alley access available to serve the driveway or loading access needs? | N/A |
| 15 | Does the Project Site include a corner lot? (avoid driveways too close to intersections) | **No**. The Project Site does not include a corner lot. |
| 16 | Does the Project propose driveway width in excess of City standard? | **No**. Per LADOT's Manual of Policies and Procedures, Section 321, it is recommended that two-way driveways serving commercial and industrial uses and multi-family residential projects with more than 25 parking spaces are 30 feet in width. The existing 30-foot wide driveway on Casitas Avenue is proposed to be removed and reconstructed in its same general location. The proposed driveway would be 30 feet in width and would conform to the City's driveway standards. As such, no conflict would occur. |
| 17 | Does the Project propose more driveways than required by City maximum standard? | **No**. The Project proposes one driveway along Casitas Avenue, a local street, which is compliant with LADOT's Manual of Policies and Procedures, Section 321. |
| 18 | Are loading zones proposed as part of the Project? | **Yes**. Loading zones are proposed internal to the Project Site on the east side of multi-family Building A and the north side of Parking Garage (Building G) and in between multi-family Buildings C and D. All of the loading facilities are internal to the Site Plan and would not conflict with roadway access or traffic on Casitas Avenue. An evaluation of the proposed Project's consistency with relevant Mobility Plan policies and programs is provided below. |

| | | |
|---|---|---|
| 19 | Does the Project include "drop-off" zones or areas? If yes, are such areas located to the side or rear of the building? | **No**. No passenger drop-off zones or areas are proposed. |
| 20 | Does the Project propose modifying, limiting/restricting, or removing public access to a public right-of-way (e.g., vacating public right-of-way)? | **No.** The Project does not propose to modify, limit or remove public access to a public right-of-way. |

*(b) Mobility Plan 2035 Consistency Analysis*

The Transportation Element of the City's General Plan, the "Mobility Plan 2035," offers a comprehensive vision and set of policies and programs the City aims to achieve to provide streets that are safe and convenient for all users. In general, the proposed Project would promote the five broad goals of the Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect. A consistency analysis addressing the Mobility Plan 2035's broad goals is provided in Table IV.F-3, Project Consistency Analysis with Applicable Provisions of the Mobility Plan 2035, in Section IV.F, Land Use and Planning in this Draft EIR. The Land Use section includes analyses of the project's consistency with a number of plans, including the community plan and walkability checklist.

As indicated in Table IV.K-3, above, the Proposed Project is located on a cul-de-sac. The Mobility Plan 2035 discourages the use of cul-de-sacs that do not provide access for active transportation options (see Policy 3.10 - Cul-de-sacs). Traditional cul-de-sacs are designed with the intention of excluding through traffic and reducing street connectivity. This reduced network connectivity has greater impacts on pedestrians and bicyclists, as the increased trip distances discourage active modes of transportation. Currently, Casitas Avenue terminates at the Project Site, and there is no public through access south of the Project Site. The property south of the Project Site is the vacant Bowtie parcel, which is planned to be developed as public park in the future. The proposed Project would be consistent with the Mobility Plan 2035's policy recommendation to design cul-de-sacs with through access for pedestrians and bicycles. As shown in Figure II-5, Ground Level Floor Plan and Landscape Plan, a designated fire lane and pedestrian walkway separating Buildings A and G (parking garage) and a pedestrian corridor between Buildings C and D, would provide pedestrian access to a designated fire lane improved with a walking path along the southern and eastern property lines adjacent to the LA River

corridor and proposed Bowtie Park property. These linkages would connect the on-site residential uses and neighboring residential uses to the proposed creative office space and neighborhood serving commercial land uses. As such, the proposed Project would not conflict with the Mobility Plan 2035.

The Mobility Plan 2035 recognizes the importance of accommodating the delivery and unloading of goods upon which businesses depend, while also seeking to minimize the impacts of large trucks in the urban environment. As noted under Policy 2.10 Loading Areas (Facilitate the provision of adequate on and off-street loading areas) "loading areas should be strategically located and designed in order to best facilitate the commercial needs of the businesses they are meant to serve. In addition, these loading and unloading areas should consider all potential vehicle maneuvers that delivery trucks can make, so as to not encroach on or block the public right-of-way." The proposed Project includes a loading zone on the northern side of Building A, approximately 60 feet south of the driveway entrance on Casitas Avenue. The loading area and drive isle accessing the parking structure is approximately 30 feet wide and 275 feet in length and would provide a sufficient on-site queuing such that traffic would not be impeded on Casita Avenue or at the project driveway. The proposed loading areas would accommodate the delivery and unloading of goods on-site and would not encroach on or block the public right-of-way. As such, the proposed Project complies with this standard.

The Mobility Plan's Program PK.1 policy calls for creative parking solutions to identify and implement creative strategies to resolve parking conflicts in areas with high-parking demand. The proposed project is located at the terminus of Casitas Avenue and is not located in a high parking demand area. As such, the proposed Project would not conflict with this program.

The Mobility Plan's Program PK.7 policy calls for off-street loading facilities in non-industrial areas. All of the proposed Project's loading areas are located on site and would not impede or back up into the public right-of-way. Thus, the proposed Project complies with this standard.

***Based on the responses provided in Table IV.K-3 above and the above analysis of relevant programs, plans or ordinances, the proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.***

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Impact After Mitigation

Plan consistency impacts 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 b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3?***

### (1) Impact Analysis

As discussed above, the proposed Project is expected to generate a net increase of 2,539 daily trips based on the VMT Calculator tool methodology. The VMT results are summarized in Table IV.K-4 below. Detailed calculations of the proposed Project's trips and VMT estimates are presented in Appendix J.1 to this EIR. As shown in Table IV.K-4, with the proposed Project, the Household VMT per Capita would be 12.7 compared to the threshold of 7.2, and the Work VMT per Capita would be 14.9 compared to the threshold of 12.7. ***Therefore, the Project would cause significant VMT impacts for both Household VMT and Work VMT.***

**Table IV.K-4**
**VMT Project Impact Analysis**

| Scenario | Household VMT Threshold | Household VMT Per Capita | Impact | Work VMT Threshold | Work VMT per Employee | Impact |
|---|---|---|---|---|---|---|
| VMT With Proposed Project | 7.2 | 12.7 | Yes | 12.7 | 14.9 | Yes |
| *Source: The Mobility Group, 2800 Casitas project – VMT Analysis, November 22, 2019 (see Appendix J.1 to this EIR)* | | | | | | |

### (2) Mitigation Measures

Consistent with City policies on sustainability and smart growth and with DOT's trip reduction and multi-modal transportation goals, the project's mitigation program first focuses on developing a trip reduction program and on solutions that promote other modes of travel. To off-set the expected significant impacts identified in the project's VMT analysis, the following measures will be required as mitigation:

**TRANS MM-1** A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. As recommended by the traffic

impact study, the TDM program shall include, but is not limited to, the following:

- Unbundled Parking: Unbundling and lease of parking spaces for residents;
- TDM Promotions and Marketing:
    - Provision of an on-site transportation coordinator to promote the TDM program and alternatives to the car and facilitate rideshare;
    - Implementation of vehicle trip reduction incentives and services for Project employees and/or tenants; provide on-site education on alternative transportation modes;
    - Provide all new employees with a Transit Welcome Package which could include information on area bus/rail transit route and connections/transfers information, bicycle facilities, and convenient local services and restaurant within walking distance of the project;
- Shared Mobility:
    - Provision of five car-share spaces and a ten-space bike-share;
    - Provision of a carpool program for employees;
    - Preferential rideshare parking location;
- Bicycle Infrastructure:
    - Provide secure bike parking and showers for employees to promote bicycling and walking;
    - Convenient parking and facilities for all bicycle riders;
    - Contribute a one-time fixed fee contribution of $50,000 to be deposited into the City's Bicycle Plan Trust fund to implement bicycle improvements in the vicinity of the project.
- Neighborhood Enhancement: The project shall ensure a substantive commitment to providing pedestrian network improvements within the project and to off-site connections. This would include connections to off-site areas including the L.A. River Bike Path and the planned public park to the south of the Project Site. The proposed Project shall also

incorporate traffic calming measures identified in the traffic study for the neighborhood streets and intersections to the north of the Project Site and south of Fletcher Drive.

The traffic study identified the following three neighborhood streets as locations that can potentially experience an increase in vehicle traffic due to project related trips:

1. Carillon Street – between Casitas Avenue and La Clede Avenue
2. La Clede Avenue – between Carillon Street and Fletcher Drive
3. Larga Avenue – between Carillon Street and Fletcher Drive

In order to address these potential impacts, the applicant shall fund implementation of a Neighborhood Traffic Management Program (NTMP). The Program shall be developed in cooperation with DOT, Council District 1 staff and affected neighborhood residents. The Program shall include an implementation plan that sets key milestones and identifies a proposed process in developing a NTM plan for the three locations. Typical NTM measures include, but are not limited to, traffic circles, speed humps, roadway narrowing effects (raised medians, traffic chokers, etc.), landscaping features, roadway striping changes, and stop sign pattern.

The NTMP should be formalized through an agreement between the applicant and DOT prior to the issuance of the first building permit for this project. The agreement should include a funding guarantee and outreach process, selection and approval criteria for any evaluated NTM measures and an implementation phasing plan. The agreement shall also guarantee funding for constructing approved NTM measures, up to $100,000. The final implementation plan, if consensus is reached among the stakeholders, would be subject to review and approval by DOT's Central District Office and it would be the Applicant's responsibility to implement any approved NTM measures through the Bureau of Engineering's B-permit process.

### (3) Level of Impact After Mitigation

The proposed project's VMT impacts were evaluated with and without the mitigation measures identified above. The VMT with mitigation analysis is summarized in Table IV.K-5, below. As shown in Table IV.K-5, with the proposed Project with mitigation scenario, the Household VMT per Capita would be 10.5 compared to the threshold of 7.2,

and the Work VMT per Capita would be 14.2 compared to the threshold of 12.7. ***As such, the proposed Project's VMT impacts per household and per capita would remain significant and unavoidable after mitigation.***

**Table IV.K-5**
**VMT Project Impact Analysis – With Mitigation**

| Scenario | Household VMT Threshold | Household VMT Per Capita | Impact | Work VMT Threshold | Work VMT per Employee | Impact |
|---|---|---|---|---|---|---|
| VMT With Proposed Project With Mitigation | 7.2 | 10.5 | Yes | 12.7 | 14.2 | Yes |

*Source: The Mobility Group, 2800 Casitas project – VMT Analysis, November 22, 2019 (see Appendix J.1 to this EIR)*

***Threshold c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).***

### (1) Impact Analysis

The proposed Project does not propose any roadway infrastructure improvements that would result in sharp curves or dangerous intersections. No incompatible uses or operations are proposed that would cause or result in incompatible equipment being used on site or on local roadways. ***As such the proposed Project's impact related to the potential to substantially increase any roadway or design hazards would be less than significant.***

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Impact After Mitigation

The proposed Project's impact related to the potential to substantially increase any roadway or design hazards would be less than significant prior to mitigation.

***Threshold d) Would the Project result in inadequate emergency access?***

## (1) Impact Analysis

The proposed Project is not located on or near an adopted emergency response or evacuation plan.[8,9] Due to the Project Site's location at the terminus of Casitas Avenue, development of the Project Site would not require temporary and/or partial street closures due to construction activities. As such, the Project's construction activities would not substantially interfere with emergency response or evacuation plans. Furthermore, the Project contractor will be required to prepare and implement a Construction Traffic Control/Management Plan to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project (see TRANS-PDF-1, above). Additionally, TRANS-PDF-2 and TRANS-PDF-4 propose additional construction control measures to further minimize the Project's potential for construction impacts. Therefore, the proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. ***The proposed Project would cause a less than significant impact to emergency access during the Project's construction phase.***

The proposed Project would be required to satisfy the emergency response requirements of the LAFD as noted in their response letter to the NOP.[10] Additionally, there are no hazardous design features included in the proposed vehicular design or site plan for the proposed Project that could impede emergency access. Furthermore, the proposed Project would be subject to the site plan review requirements of the LAFD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. As identified in Section II, Project Description, an alternative emergency access route to the Project Site would be provided via one of three potential access plans: (1) creating a new emergency access easement from the Glendale Freeway eastbound on ramp at Fletcher Drive, (2) utilization of the LADWP access road on the east bank of the LA River, or (3), ensuring an unobstructed access route through the State Park land to the south of the Project Site. As a condition of Project approval, the Project will need to provide one of these three alternative emergency access routes and obtain necessary approvals from the agencies with jurisdiction. ***Therefore, the proposed Project would***

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[8] *Los Angeles County, Department of Public Works, Disaster Routes with Road Districts: South Los Angeles County, website: http://dpw.lacounty.gov/dsg/disasterroutes/map/disaster_rdm-South.pdf, accessed January 2016.*

[9] *County of Los Angeles, Department of Public Works, Disaster Routes with Road Districts South Los Angeles County, September 2012.*

[10] *See City of Los Angeles Inter-Departmental Correspondence from the LAFD to the Department of City Planning, Re: ENV-2016-2862-EIR, dated November 6, 2017 provided in Appendix I to this Draft EIR.*

***not be expected to result in inadequate emergency access, and a less than significant impact would occur during the proposed Project's operation.***

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Impact After Mitigation

The proposed Project's impact related to emergency access would be less than significant prior to mitigation.

## e) Cumulative Impacts

### (1) Impact Analysis

With regard to threshold a), relevant plans, ordinances and policies that are applicable to the proposed Project, as addressed in Table IV.K-3 above, were reviewed in conjunction with the related projects identified in Section III, Environmental Setting (See Table III-2, Related Projects List) to assess the potential for cumulative impacts that may result from the proposed project in combination with other development projects in the study area. With the exception of related Project No. 15 (the future Bowtie state park project), none of the related projects are located on Casitas Avenue or in close enough proximity to the Project Site to cumulatively impact or impede the City from implementing any adopted policy and/or program related to the City's circulation system, including transit, roadway, bicycle and pedestrian facilities. With respect to the future Bowtie state park project, no specific plans have been proposed at this time for that project. However, the proposed Project has been designed to provide through pedestrian and bicycle access to the state park parcel. As such, cumulative impacts upon adopted policy and/or programs would be less than significant.

With regard to threshold b), cumulative VMT impacts are determined through a consistency check with SCAG's 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas emissions reduction targets. As such, projects that are consistent with the 2016-2040 RTP/SCS in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. As discussed in further detail in Section IV.F Land Use, the proposed Project is consistent with the regional growth projections of the 2016-2040 RTP/SCS. Additionally, the proposed Project is a compact infill development, which is the type of project encouraged by the 2016-2040 RTP/SCS and transportation planning in accordance with Senate Bill

(SB) 375. Thus, since the proposed Project is consistent with the 2016-2040 RTP/SCS, cumulative VMT impacts would be less than significant.

With regard to threshold c) the proposed Project does not propose any roadway infrastructure improvements that would result in sharp curves or dangerous intersections. No incompatible uses or operations are proposed that would cause or result in incompatible equipment being used on site or on local roadways. As such, the proposed Project would not have the potential to result in or contribute to cumulative impacts associated with hazards due to a geometric design features or incompatible uses.

With regard to threshold d) the proposed Project would result in a less than significant impact associated with emergency access. Implementation of one of the three alternative emergency access routes to be a condition of Project approval. Provision of such emergency access would ensure that cumulative impacts related to emergency access to/from the Project Site and the adjacent future Bowtie state park project are less than significant.

### (2) Mitigation Measures

No mitigation measures are required.

### (3) Level of Impact After Mitigation

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

# IV. Environmental Impact Analysis

# L. Cultural Resources

## 1. Introduction

The following section focuses on the proposed Project's potential to result in significant impacts upon historic cultural resources, including archaeological, and historic resources. The historic impact assessment findings presented in this section are based on the Department of City Planning's Environmental and Public Facilities Maps (Sept. 2006) and the information presented in the following reports and correspondences, which are provided in Appendix L to this Draft EIR:

- South Central Coast Information Center (SCCIC), California State University, Fullerton, Department of Anthropology, *California Historical Resources Information System (CHRIS) Records Search Results for the Bow Tie Yard Lofts Project*, October 5, 2016. (Appendix L.1)

## 2. Environmental Setting

### a) Regulatory Framework

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, and in certain instances, protection of historic resources. Additionally, states and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities. The National Historic Preservation Act (NHPA) of 1966, as amended, and the California Register of Historical Resources (California Register) are the primary federal and state laws and regulations governing the evaluation and significance of historic resources of national, state, regional, and local importance. As archaeological resources are also considered historic, regulations applicable to historic resources are also applicable to archaeological resources and are discussed and analyzed in this section. As described below, the principal federal, state, and local laws governing and influencing the preservation of historic resources of national, state, regional, and local significance include the NHPA of 1966, as amended; the California Register; California Environmental Quality Act (CEQA); and the City of Los Angeles Cultural Heritage

Ordinance (Los Angeles Administrative Code, Section 22.120 et seq.), and the City of Los Angeles General Plan Conservation Element, all of which are summarized below.

### (1) Historic Resources

#### *(a) National Register of Historic Places*

The National Register of Historic Places (National Register) was established by the NHPA, as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."[1] The National Register recognizes properties that are significant at the national, state, and/or local levels.

##### *(i) Criteria*

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:[2]

a) Associated with events that have made a significant contribution to the broad patterns of our history; or
b) Associated with the lives of persons significant in our past; or
c) Embodies the distinctive characteristics of a type, period, or method of construction or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction; or
d) Has yielded, or may be likely to yield, information important in prehistory or history.

##### *(ii) Integrity*

In addition to meeting any or all of the criteria listed above, properties nominated must also possess historic integrity, which is the ability of a property to convey its significance and is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existing during the property's historic period."[3] The National Park Service defines seven aspects of integrity: location, design, setting,

[1] *Title 36 Code of Federal Regulations (CFR) Part 60.2.*
[2] *Title 36 Code of Federal Regulations, Part 60.4.*
[3] *California Public Resources Code, Section 5023.1(d).*

materials, workmanship, feeling, and association. These qualities are defined as follows:

- Location is the place where the historic property was constructed or the place where the historic event took place.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.[4]

*(iii) Historic Districts*

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties."[5]

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.[6] A district's significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;

[4] *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, U.S. Department of the Interior, National Park Service, rev. 2002, https://www.nps.gov/nr/*publications*/bulletins/nrb15/.*

[5] *Ibid, at page 5.*

[6] *Title 36 Code of Federal Regulations, Part 60.3(d).*

- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.[7]

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.[8]

*(b) California Environmental Quality Act*

The California Environmental Quality Act (CEQA) requires that environmental protection be given significant consideration in the decision-making process. Historical resources are included under environmental protection. Thus, any project or action which constitutes a substantial adverse change to a historical resource also has a significant effect on the environment pursuant to the State CEQA Guidelines. When the California Register was established in 1992, the Legislature amended CEQA to clarify which cultural resources are significant, as well as which project impacts are considered to be significantly adverse. A "substantial adverse change" means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."[9]

Section 15064.5(a) of the State CEQA Guidelines defines a "historical resource" as follows:

> *(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).*
>
> *(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the*

[7] *National Register Bulletin #21, p. 12.*
[8] *National Register Bulletin #16, p. 16.*
[9] *State CEQA Guidelines Section 15064.5(b)(1).*

*Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.*

*(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:*

*(a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;*

*(b) Is associated with the lives of persons important in our past;*

*(c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*

*(d) Has yielded, or may be likely to yield, information important in prehistory or history.*

*(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.*

The courts have interpreted CEQA to create three categories of historical resources:

- **Mandatory historical resources** are resources "listed in, or determined to be eligible for listing in, the California Register of Historical Resources."
- **Presumptive historical resources** are resources "included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1" of the

California Public Resources Code (PRC), unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.

- **Discretionary historical resources** are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.

To simplify the first three definitions provided in the CEQA statute, an historical resource is a resource that is:

- Listed in the California Register;
- Determined eligible for the California Register by the State Historical Resources Commission; or
- Included in a local register of historical resources.

Section 15064.5 of the CEQA Guidelines (California Code of Regulations (CCR), Title 14, Chapter 3) supplements the statute by providing two additional definitions of historical resources, which may be simplified in the following manner. An historical resource is a resource that is:

- Identified as significant in an historical resource survey meeting the requirements of PRC Section 5024.1 (g);
- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, this category includes resources that meet the criteria for listing on the California Register (PRC Section 5024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in Subdivision (g) of PRC Section 5024.1, does not preclude a lead agency from determining that the resource may be an “historical resource” for purposes of CEQA. Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register. Properties designated by local municipalities can also be considered historical resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

A property may be designated as historic by federal, state, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

*(c) California Register of Historical Resources*

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.[10] The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.[11]

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or

[10] *Public Resources Code Section 5024.1(a).*
[11] *Public Resources Code Section 5024.1(d).*

3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or

4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.[12]

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:[13]

1. The survey has been or will be included in the State Historic Resources Inventory;

2. The survey and the survey documentation were prepared in accordance with State Office of Historic Preservation (SOHP) procedures and requirements;

3. The resource is evaluated and determined by the SOHP to have a significance rating of Category 1 to 5 on a Department of Parks and Recreation (DPR) Form 523; and

4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

*(d) City of Los Angeles Cultural Heritage Ordinance*

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et. seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. Administrative Code Section 22.171.7 states that:

[12] *Public Resources Code Section 4852.*
[13] *Public Resources Code Section 5024.1.*

*For purposes of this article, a Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.*

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCM.

*(e) Los Angeles General Plan Conservation Element*

The City's guidelines for the protection of historic and cultural resources are contained in Section 5. The Conservation Element establishes the policy to continue to protect pre-historic, historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.

*(f) Los Angeles Administrative Code*

*(i) Historic-Cultural Monuments*

The Los Angeles Administrative Code, Section 22.130, defines a historical or cultural monument as "any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which [numbers added for reference]:

1. the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or
2. which is identified with historic personages or with important events in the main currents of national, State or local history; or
3. which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of

construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age."

Designated HCM and properties that are officially under consideration for such status, are subject to certain provisions and reviews affecting issuance of building or other permits.

*(ii) Historic Preservation Overlay Zones*

Section 12.20.3 of the Los Angeles Administrative Code provides for the designation of an area having historic, architectural, cultural, or aesthetic significance as a Historic Preservation Overlay Zone (HPOZ).

Contributing features to an HPOZ may be structures, landscaping, natural features or sites that meet one or more of the following criteria:

- [the feature] adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or

- owing to its unique location or singular physical characteristics, [the feature] represents an established feature of the neighborhood, community or city; or

- retaining the structure would help preserve and protect an historic place or area of historic interest in the City.

*(g) SurveyLA*

The City of Los Angeles, through the Office of Historic Resources (OHR) in the Department of City Planning, completed a citywide historic resources survey known as SurveyLA. The Survey serves as the centerpiece for the City's historic preservation program and provides baseline information on potential historic resources to property owners, residents, decision makers, and other stakeholders. A historic context statement was developed in order to provide a consistent framework for the evaluation of potential resources. The context statement identifies significant themes in the City's history and the property types associated with each of those themes and establishes eligibility requirements and character-defining features for each property type. The survey is conducted by community plan area using SurveyLA methodology. SurveyLA examined individual, non-parcel resources, and historic districts for the Northeast Los Angeles Community Plan Area. Results of the surveys have been published on OHR's

website. Building permit applications that affect properties identified as historic resources in SurveyLA may be subject to review by OHR.

### (2) Archaeological Resources

As part of the determination made pursuant to PRC Section 21080.1, the lead agency shall determine whether the project may have a significant effect on archaeological resources (PRC Section 21083.2). PRC Section 21083.2(b) provides the following guidance on how to mitigate or avoid the significant effects that a project may have on unique archeological resources. PRC Section 21083.2(b) states that "If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

(1) Planning construction to avoid archaeological sites.
(2) Deeding archaeological sites into permanent conservation easements.
(3) Capping or covering archaeological sites with a layer of soil before building on the sites.
(4) Planning parks, greenspace, or other open space to incorporate archaeological sites."

As defined within PRC Section 21083.2(g), "unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

(1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
(2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
(3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

As defined in PRC Section 21083.2(h), "nonunique archaeological resource" means an archaeological artifact, object, or site, which does not meet the criteria in subdivision (g). A nonunique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects.

Pursuant to PRC Section 21083.2(i), as part of conditions imposed for mitigation, a lead agency may make provisions for archaeological sites accidentally discovered during

construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place.

## b) Existing Conditions

### (1) Historic Resources

Neither the Project Site, building, nor surrounding properties are identified by SurveyLA or the Los Angeles Historic Places LA Inventory as potentially historical resources.[14,15] According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS), the existing light industrial building on-site was constructed in 1999. As stated above in the Regulatory Setting subsection, the minimum age criterion for a property to be eligible for listing in the National Register and California Register is usually 50 years unless a property is of exceptional importance. Because the on-site building is less than 20 years old and given its utilitarian design, the existing on-site building does not qualify as a historic resource.

### (2) Archaeological Resources

#### *(a) South Central Coastal Information Center Records Search*

On October 5, 2016, the South Central Coastal Information Center (SCCIC) conducted an archaeological and historical records search of the California Historical Resources Information System (CHRIS) for the Project Site and an approximate ½-mile radius of the area surrounding the Project Site. The records search results are included in Appendix L.1 to this Draft EIR and are summarized below. The records search included a review of all recorded archaeological and built-environment resources, as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register, the National Register, the California State Historic Properties Directory (HPD), and the City of Los Angeles HCM listings were reviewed for the Project Site and surrounding area. Due to the sensitive nature of cultural resources, archaeological site locations were not released. The records search results are summarized in Table IV.L-1 below.

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[14] *Los Angeles Historic Resources Survey, SurveyLA, Northeast Los Angeles, Individual Resources, February 6, 2017.*

[15] *Los Angeles Historic Resources Inventory, Historic Places LA, Map View, website: http://historicplacesla.org/map, accessed September, 2016.*

The SCCIC letter stated that the Project Site has not been previously surveyed for cultural resources.

**Table IV.L-1**
**SCCIC Records Search Results**

| Resources | Occurrences within the Project Area | Occurrences within a ½-Mile Radius of the Project Site |
|---|---|---|
| Archaeological Resources | 0 | 0 |
| Built Environment Resources | 0 | 3 |
| Reports and Studies | 0 | 14 |
| OHP Historic Properties Directory (HPD) | 0 | 29 |
| California Points of Historical Interest (SPHI) | 0 | 0 |
| California Historical Landmarks (SHL) | 0 | 0 |
| California Register | 0 | 30 |
| National Register | 0 | 2 |
| City of Los Angeles HCM | 0 | 1 |

*Source: SCCIC, Records Search Results for the Bow Tie Yard Lofts Project, October 5, 2016 (See Appendix L.1).*

*(b) Los Angeles River Corridor*

The Project Site is located within the Los Angeles River corridor within the former Taylor Yard Opportunity Area,[16] as identified by the Los Angeles River Revitalization Master Plan (LARRMP) Final Programmatic Environmental Impact Report/Programmatic Environmental Impact Statement (PEIR/PEIS). The LARRMP identifies five opportunity areas along the River Corridor. Each of the five opportunity areas presents a distinct set of river revitalization opportunities to demonstrate integration of LARRMP measures. Within each of the areas, appropriate river channel modification measures and open space measures have been organized to reflect existing land form and environmental characteristics, as well as community-based LARRMP revitalization opportunities and objectives. Also, the opportunity areas provide suitable locations for what are described in the LARRMP as reinvestment areas. These are specific regions within the opportunity areas where long-term land use changes can be undertaken to help achieve long-term economic viability and sustainability within the revitalized River Corridor.[17] The LARRMP Final PEIR/PEIS identifies many cultural resource studies and many

[16] *The Taylor Yard Opportunity Area is bounded on the north by Fletcher Drive, on the east by Metrolink, on the south by the Pasadena Freeway, and on the west by Blake Avenue.*

[17] *Los Angeles River Revitalization Master Plan Final Programmatic Environmental Impact Report / Programmatic Environmental Impact Statement (LARRMP Final PEIR/PEIS) page ES-7.*

confirmed and potentially prehistoric and historic archaeological sites along the length of the Los Angeles River Corridor.[18]

The former Taylor Yard rail yard complex borders the Project Site to the south and extends approximately 1.5 miles along the Los Angeles River with parcels on both the east and west sides of the railway. The Taylor Yard was divided into six main parcels (i.e., Parcels C, D, E, F, G-1, and G-2). California State Parks acquired Parcels D and G-1 for the development of a park.

The Los Angeles River corridor was a natural transportation route. The Taylor Yard Opportunity Area contained a former freight rail switch yard and maintenance facility whose origins date back to 1888. The Taylor Yard was a major rail hub in Los Angeles and supported the development of industry and working-class residential communities. Table IV.L-2, below, lists the seven historical buildings that have been confirmed within the vicinity of the Taylor Yard Opportunity Area, none of which are located on the Project Site.[19]

**Table IV.L-2**
**Designated Taylor Yard Opportunity Area Cultural Resources**

| Resource Designation | Resource Type | Listing or Status [a] | Notes |
|---|---|---|---|
| Navy and Marine Corps Reserve Center, #972 | Historic structure, historic association | CHL, CRHR | 1938-1941 Art Deco; largest enclosed structure without walls; over 100,000 servicemen processed in this facility. |
| Olive Switching Station | Historic building | CRHR, NRHP | 1916 railyard facility |
| Richard Henry Dana Branch Library #2505 | Historic building | CRHR, NRHP, LACHM | Library |
| Glassell Park School | Historic building | LACHM | 1923 Spanish Colonial Revival / Art Deco architecture |
| Dorris Place Elementary School Administration Building | Historic building | CRHR, HRHP (both pending) | 1922 Romanesque Revival architecture |
| Fletcher Drive Bridge #322 | Historic bridge | LACHM | 1927 concrete bridge over the Los Angeles River |
| Van de Kamp's Holland Dutch Bakery #569 | Historic building | LACHM | 1930 thematic architecture, 16th Century Dutch Revival. |

[a] *CRHR = California Register of Historical Resources - Eligible; NRHP = National Register of Historic Places – Eligible; CHL = California Historic Landmark; LAHCM = Los Angeles Historical-Cultural Monument.*

*Source: Los Angeles River Revitalization Master Plan Final Programmatic Environmental Impact Report / Programmatic Environmental Impact Statement (LARRMP Final PEIR/PEIS) page 3-182.*

[18] *Los Angeles River Revitalization Master Plan Final Programmatic Environmental Impact Report / Programmatic Environmental Impact Statement (LARRMP Final PEIR/PEIS) pages 3-181 through 3-182.*

[19] *Ibid (pages 3-181 through 3-182).*

# 3. Project Impacts

## a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to cultural resources if it would:

***Threshold (a): Cause a substantial adverse change in significance of a historical resource pursuant to Section 15064.5;***

***Threshold (b): Cause a substantial adverse change in significance of an archaeological resource pursuant to Section 15064.5;***

***Threshold (c): Disturb any human remains, including those interred outside of formal cemeteries.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions. The Thresholds Guide identifies the following criteria to evaluate cultural resources:

### (1) Historical Resources

A project would normally have a significant impact upon historical resources if the project would result in a substantial adverse change in the significance of an historical resource. A substantial adverse change in significance occurs if the project involves (1) demolition of a significant resource, (2) relocation that does not maintain the integrity and significance of a significant resource, (3) conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, and/or (4) construction that reduces the integrity or significance of important resources on the site or in the vicinity.

### (2) Archaeological Resources

A project would normally have a significant impact upon archaeological resources if the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it: (a) is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory; (b) can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions; (c) has a special or particular quality,

such as the oldest, best, largest, or last surviving example of its kind; (d) is at least 100-years-old[20] and possesses substantial stratigraphic integrity; or (e) involves important research questions that historical research has shown to be answered only with archaeological methods.

## b) Methodology

### (1) Historic Resources

Cultural Resources reports conducted on nearby development sites were reviewed to determine the possibility of finding cultural resources on the Project Site. Additionally, the SCCIC and the Natural History Museum of Los Angeles County were consulted to conduct a records search of the Project Site and surrounding area (summarized above).

### (2) Archaeological Resources

To address potential impacts associated with archaeological resources, the SCCIC was consulted to conduct a records search of the Project Site and surrounding area to include archaeological resources.

## c) Project Design Features

No specific project design features are proposed with regard to cultural resources.

## d) Analysis of Project Impacts

***Threshold (a): Would the Project cause a substantial adverse change in significance of a historical resource pursuant to Section 15064.5?***

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and in the Initial Study (Appendix A of this Draft EIR), the existing building on-site was constructed in 1999. The California Office of Historic Preservation generally recommends an evaluation of buildings and structures older than 45 years of age by professionals meeting the Secretary of the Interior Standards Professional Qualifications for Architectural History and Archaeology. As such, the building does not qualify for evaluation and would not be considered a historical resource. ***Thus, the Project would have no impact with respect to Threshold (a), and no further analysis is required.***

[20] *Although the CEQA criteria state that "important archaeological resources" are those which are at least 100- years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.*

***Threshold (b): Would the Project cause a substantial adverse change in significance of an archaeological resource pursuant to Section 15064.5?***

### (1) Impact Analysis

As discussed in the Environmental Setting section above, there are no known archaeological resources on the Project Site or within a ½-mile radius of the Project Site. However, the SCCIC recommends that, due to the Project Site's proximity to the Los Angeles River and the Project Site's location and historical association with railroad activity, the Project Site be considered potentially sensitive for cultural resources.

As discussed in Section IV.C, Geology and Soils, of this Draft EIR, the Project Site contains previously placed primary structural fill approximately within the current building footprint ranging from approximately 12 to 23 feet below existing grade.[21] In addition, the existing fill depths near the northern property line of the Project Site range from approximately 1 to 14 feet below existing grade.[22]

Construction of the proposed Project would entail the demolition of the existing structures and excavation up to approximately 15 feet for required earthwork removals. Although no subterranean levels are proposed, earthwork removals for the foundation of the seven-story parking structure (Building G) would be approximately 10 feet to 12 feet below existing grade. Earthwork removals for the six-story mixed-use building (Building A) would be a minimum of 10 feet below existing grade. Earthwork removals for the five-story mixed-use buildings (Building B, Building C, and Building D) range from approximately 2 to 15 feet below existing grade. Within the limits of the previously placed primary structural fill, removals would be a minimum of two feet below existing grade/bottom of existing slab. In addition, previously placed undocumented fills and loose/compressed native soils would be removed and replaced as properly compacted fills.[23] Excavation into the native soil below the documented fill material is not anticipated, except in limited areas.

As previously concluded in the Initial Study (see Appendix A to this Draft EIR), mitigation measures were recommended to ensure that the Project would have a less than significant impact with respect to archaeological resources in the unlikely event that archaeological resources are discovered during excavation, grading, or

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[21] *LGC Geotechnical, Inc., Preliminary Geotechnical Report for Proposed Bow Tie Yard Lofts and Adjacent Parking Structure, Vesting Tentative Tract 74366, 2750 to 2800 West Casitas Avenue, Los Angeles, California, January 16, 2017. ("Geotechnical Report" is included in Appendix D)*

[22] *LGC Geotechnical, Inc., Geotechnical Due-Diligence Report for the Proposed Five-Story Apartment Structure and adjacent Six-Story Parking Structure, 2800 Casitas Street, Los Angeles, California, June 1, 2016.*

[23] *Geotechnical Report, January 16, 2017. (Included in Appendix D).*

construction activities. ***Based on the lack of archaeological resources being discovered prior to the existing development and the absence of any known archaeological resources, and the incorporation of mitigation measures CUL-MM-1, CUL-MM-2 and CUL-MM-3 which would address the unlikely discovery of archaeological materials, the proposed Project would result in a less than significant impact upon a known archaeological resource.***

### (2) Mitigation Measures

The following mitigation measures are proposed to ensure that any Project impacts related to the inadvertent discovery of archaeological resources would be less than significant.

**CUL-MM-1**: In the unlikely event that archaeological resources are encountered during the construction phase, all further ground-disturbing activities in the area of the find shall be halted and:

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;
- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
- The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.

**CUL-MM-2:** Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

SCCIC Department of Anthropology
McCarthy Hall 477
CSU Fullerton
800 North State College Boulevard Fullerton, CA 92834

**CUL-MM-3:** Prior to the issuance of any building permit, the Applicant shall:

- Submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the Applicant to this condition shall be recorded prior to the issuance of a grading permit.

### (3) Level of Significance After Mitigation

Project impacts related to archaeological resources would be less than significant with mitigation.

***Threshold (c): Would the Project disturb any human remains, including those interred outside of formal cemeteries?***

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and in the Initial Study (Appendix A of this Draft EIR), reviews of the California Historical Resources Information System (CHRIS), by the SCCIC, and the sacred lands file by the Native American Heritage Commission (NAHC) resulted in negative results, meaning there are no known human remains on the Project Site. Because the soils beneath the Project Site are known to be underlain with 1 to 14 feet of fill materials, the potential to discover human remains during construction would be considered low. In the unlikely event that any human remains are encountered unexpectedly during construction, demolition, and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. ***Thus, the Project would have a less than significant impact with respect to Threshold (c), and no further analysis is required.***

## e) Cumulative Impacts

### (1) Impact Analysis

The proposed Project, in combination with the construction and operation of the 17 related projects (See Section III, Environmental Setting), would result in the continued redevelopment and revitalization of the surrounding area.

Finds of archeological resources tend to be site-specific. With regards to archeological resources, the proposed Project would result in a less than significant impact with mitigation. Furthermore, compliance with all applicable regulatory compliance measures that establish procedures if a find were to occur during the construction of the proposed Project would ensure impacts to archaeological resources remain less than significant. Additionally, similar to the proposed Project, each related project would be required to comply with regulatory requirements to ensure the proper treatment of such resources. For this reason, the proposed Project's incremental contribution to a cumulative impact would not be cumulatively considerable. ***Cumulative impacts to archeological resources would therefore be less than significant.***

### (2) Mitigation Measures

Cumulative impacts related to archaeological resources would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

The potential for impacts to occur to archaeological resources were concluded to be less than significant based on the lack of known resources to be located on site and the extent of prior subsurface grading activities. ***Incorporation of project mitigation measures CUL-MM-1, CUL-MM-2 and CUL-MM-3 would further ensure any potential impacts associated with the unlikely discovery of any archeological materials are reduced to less than significant levels.***

# IV. Environmental Impact Analysis

# M. Biological Resources

## 1. Introduction

This section examines the degree to which the Project may result in significant environmental impacts with respect to biological resources, as regulated by the California Department of Fish and Wildlife (CDFW). Documents and references used in the preparation of this section include, but are not limited to the following:

- Biological Technical Memorandum for the 2800 Casitas Project, an Approximately 5.7-Acre Property Located in Los Angeles County, Glenn Lukos Associates, June 13, 2017 [Revised January 22, 2019 and April 18, 2019] (See Appendix H); and
- Non-Protected Tree Report, 2800 Casitas, Los Angeles, Greg Applegate, ASCA, ASLA, Arborgate Consulting, Inc., June 20, 2016. (See Appendix A.1)

This section documents the results of the Biological Technical Memorandum and Tree Report that were conducted in accordance with the City of Los Angeles Thresholds Guide for biological resources pursuant to CEQA. The following provides a discussion of existing conditions for the Project Site and adjacent areas and an evaluation of the Project Site for special-status species, including species that are listed as threatened or endangered pursuant to the Federal Endangered Species Act of 1973 (FESA) and the California Endangered Species Act of 1984 (CESA), wildlife that are assigned other designations (e.g., state species of special concern, state fully-protected species, etc.), and non-listed plants given special status by the California Native Plant Society (CNPS).

## 2. Environmental Setting

### a) Project Location

The Project Site is a triangle-shaped parcel and covers approximately 5.7 acres in the City of Los Angeles and is located within an unsectioned portion of Township 1 South, Range 13 West, of the U.S. Geological Survey (USGS) map of the Los Angeles 7.5-Minute Quadrangle.[1] The Project Site is generally bounded by SR-2 to the west, a

[1] *The Los Angeles 7.5-Minute Quadrangle map was originally mapped in 1966 and revised in 1981.*

commercial self-storage facility to the north, the Los Angeles River to the south, and State Parks land and rail lines to the east.

## b) Regulatory Framework

### (1) Federal

#### *(a) Federal Endangered Species Act*

Under the FESA, the Secretary of the Interior and the Secretary of Commerce have joint authority to list a species as threatened or endangered (16 United States Code [USC] 1533[c]). Pursuant to the requirements of the FESA, a federal agency reviewing a project within its jurisdiction must determine whether any federally listed, threatened, or endangered species, or species proposed for federal listing may be present in the project area and determine whether the project will have a potentially significant impact on such species. In addition, the federal agency is required to determine whether the project is likely to jeopardize the continued existence of any species proposed to be listed under the FESA or result in the destruction or adverse modification of critical habitat proposed to be designated for such species (16 USC 1536[3],[4]). Adverse project impacts on these species or their habitats would be considered potentially significant.

Vulnerable or "at-risk" species which have been proposed or are being considered for listing as threatened or endangered or "species of special concern" are categorized administratively by the U.S. Fish and Wildlife Service (USFWS). The FESA defines an endangered species as:

> *"any species which is in danger of extinction throughout all or a significant portion of its range..."* [2]

The FESA defines a threatened species as:

> *"any species which is likely to become an endangered species in the foreseeable future throughout all or significant portions of its range..."* [3]

Federal regulatory status species' listings are as follows:

Federally listed as Endangered = FE
Federally listed as Threatened = FT
Federally Proposed as Endangered = FPE

[2] *U.S. Fish and Wildlife Service, Endangered Specific Act, pg. 2, website: https://www.fws.gov/endangered/laws-policies/section-3.html, accessed June 2018.*
[3] *Ibid at page 4.*

Federally Proposed as Threatened = FPT
Federal Candidate Species = FC
Federally Proposed for Delisting = FPD
Federally Delisted as Endangered or Threatened = FDL

*(b) Clean Water Act (Section 401 and 404)*

The U.S. Army Corps of Engineers (Corps) and the U.S. Environmental Protection Agency (USEPA) regulate the discharge of dredged or fill material into waters of the United States, including wetlands, under Section 404 of the Clean Water Act (CWA) (33 U.S.C. 1344). Waters of the United States are defined in Title 33 CFR Part 328.3(a) and include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds. The lateral limits of jurisdiction in those waters may be divided into three categories – territorial seas, tidal waters, and non-tidal waters – and are determined depending on which type of waters is present (Title 33 CFR Part 328.4(a), (b), (c)). Activities in waters of the United States regulated under Section 404 include fill for development, water resource projects (such as dams and levees), infrastructure developments (such as highways and airports) and mining projects. Section 404 of the CWA requires a federal license or permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g., certain farming and forestry activities). Section 401 of the Clean Water Act (33 U.S.C. 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the United States to obtain a certification from the state in which the discharge originates or would originate, or, if appropriate, from the interstate water pollution control agency having jurisdiction over the affected waters at the point where the discharge originates or would originate, that the discharge will comply with the applicable effluent limitations and water quality standards. A certification obtained for the construction of any facility must also pertain to the subsequent operation of the facility. The responsibility for the protection of water quality in California rests with the State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs).

*(c) Migratory Bird Treaty Act (MBTA)*

The federal Migratory Bird Treaty Act (16 USC, Sec.703, Supp. I, 1989) prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. This act encompasses whole birds, parts of birds, and bird nests and eggs. The over 800 avian species, including geese, ducks,

shorebirds, raptors, songbirds, and many relatively common species, protected under the MTBA are listed in 50 CFR 10.13.

### (2) State

#### *(a) California Endangered Species Act*

Section 2080 of the California Fish and Game Code prohibits the taking of plants and animals listed under the authority of the CESA. Under the CESA, the CDFW maintains a list of threatened species and endangered species (California Fish and Game Code 2070). The CDFW also maintains a list of candidate species that are species that the CDFW has formally noticed as being under review for addition to either the list of endangered species or the list of threatened species. The CDFW also maintains lists of "species of special concern" which serve as "watch lists." Pursuant to the requirements of the CESA, an agency reviewing a project within its jurisdiction must determine whether any state-listed endangered or threatened species may be present in the project area and determine whether the project will have a potentially significant impact on such species.

The CESA defines an endangered species as:

> *"a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease."*[4]

The CESA defines a threatened species as:

> *"a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species."*[5]

California regulatory status species listings are as follows:

State listed as Endangered = SE
State listed as Threatened = ST
State Candidate for Endangered = SCE
State Candidate for Threatened = SCT

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[4] *California Legislative Information, Fish and Game Code, Division 3. Fish and Game Generally [2000-2948], Article 1. General Provisions [2050-2069].*

[5] *Ibid.*

State Candidate Delisted = SCD
State Delisted as Recovered = SDR
State Delisted as Extinct = SDE
State listed as Rare (Plants only) = SR

Other State classifications are:

State Special Animal = SSA *(not included in L.A. CEQA Thresholds Guide)*
State Watch List Bird Species = SWL *(not included in L.A. CEQA Thresholds Guide)*

Candidate species are defined as:

> *"a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list."*[6]

Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the FESA, the CESA does not include listing provisions for invertebrate species.

*(b) California Native Plant Protection Act*

The legal framework and authority for the state's program to conserve plants are derived from various legislative sources, including the CESA, the California Native Plant Protection Act (Fish and Game Code Section 1900 – 1913), CEQA Guidelines, and the Natural Communities Conservation Planning Act.

The Native Plant Protection Act of 1977 (Fish and Game Code Section 1900 et seq.) gives the CDFW authority to designate State Endangered, Threatened, and Rare plants and provides specific protection measures for identified populations. Sensitive plants and wildlife species that would qualify for listing but are not currently listed are afforded protection under CEQA. The CEQA Guidelines, Section 15065 (Mandatory Findings of Significance) requires that a reduction in numbers of a rare or endangered species be considered a significant effect. CEQA Guidelines Section 15380 (Rare or endangered species) provides for assessment of unlisted species as rare or endangered under CEQA if the species can be shown to meet the criteria for listing.

[6] *Ibid.*

*(c) California Native Plant Society*

California Native Plant Society (CNPS) maintains a list of special status plant species based on collected scientific information. Designation of these species by CNPS has no legal status or protection under federal or state endangered species legislation. CNPS designations are defined as List 1A (plants presumed extinct); List 1B (plants rare, threatened, or endangered in California and elsewhere); List 2 (plants rare, threatened, or endangered in California, but more numerous elsewhere); List 3 (plants about which more information is needed – a review list); and List 4 (plants of limited distribution - a watch list). In general, plants appearing on CNPS List 1A, 1B or 2 meet the criteria of Section 15380 of the CEQA Guidelines; thus, substantial adverse effects to these species would be considered significant. Additionally, plants constituting CNPS List 1A, 1B or 2 meet the definitions of California Department Fish and Game Code Section 1901 (Native Plant Protection Act) or Sections 2062 and 2067 (California Endangered Species Act).

## (3) Local

*(a) City of Los Angeles Protected Tree Ordinance*

The City of Los Angeles Municipal Code (LAMC) (Section 1., Subdivision 12 of Subsection (a) of Section 12.21; Ordinance 177,404 as amended) provides for the protection of native trees of four types: (1) oaks other than scrub oak (*Quercus dumosa*), (2) Southern California black walnut (*Juglans californica var. californica*), (3) western sycamore (*Platanus racemosa*), and (4) California bay (*Umbellularia californica*). To qualify for protection, individual plants must also measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, street trees would need to be replaced on a 2:1 basis. Removal of the existing street trees in the public right-of-way would occur in accordance with the policies of the City of Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division. Removal of the existing street tree in the public right-of-way would require approval of the Board of Public Works.

*(b) Los Angeles River Master Plan – River Implementation Overlay (RIO)*

The RIO Ordinance was adopted for purposes of implementing the Los Angeles River Revitalization Master Plan (LARRMP), which was passed by the City of Los Angeles City Council in April 2007. The LARRMP focuses on the Los Angeles River and its surrounding communities in an effort to revitalize the Los Angeles River, green neighborhoods, capture community opportunities, and create value. The Los Angeles

River Master Plan produced by the County of Los Angeles Department of Public Works (as lead agency), Parks and Recreation, and Regional Planning, the National Park Service and the Master Plan Advisory Committee, articulates the vision for the development of a continuous natural scenic and recreational corridor enhancement of the existing flood control channel. Adherence to the Master Plan will ultimately promote and increase the value of the river, aesthetically, economically, and ecologically.

The Ordinance No. 183,145 (RIO Ordinance) supports the LARRMP by promoting sustainable environments and providing design guidelines. The RIO Ordinance establishes development regulations that address landscaping, screening/fencing, and exterior site lighting.

The Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes (Landscaping Guidelines) for the Los Angeles River and Tujunga Wash provides County-approved guidelines and procedures to implement projects that demonstrate best management practices (BMPs) for watershed protection and acceptable amenities and plant materials for public use between the top of the channel and the right-of-way limits. The Landscaping Guidelines are divided into two parts: Design Considerations and Planting Guidelines. The Design Considerations outline the goals and approach for revegetation of the public right-of-way. The Planting Guidelines are specific to the process of planning and planting the right-of-way. The Plant Palette Guidelines provide opportunities for distinctive design applications depending on the native palettes chosen on a site-by-site basis. Plant palette selection is heavily dependent on the existing conditions of channelization (entrenched or leveed), native or imported soil conditions, access to water, sun exposure amount of shade, rights-of-way width variations and adjacent land uses.[7] The Landscaping Guidelines focus on the following objectives:

- Create a River Identity;
- Provide a Framework for Public Recreation and Non-Motorized Transportation;
- Create an Indigenous Native Plant Landscape;
- Implement Watershed Management Best Management Practices (BMPs); and
- Utilize Sustainable Forms of Energy and Materials.

[7] *Los Angeles County, Department of Public Works, Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes, January 2004.*

*(c) Los Angeles River Habitat Enhancement Study and Opportunities Assessment*

The Project Site is located adjacent to the study area identified in the Nature Conservancy Urban Conservation Program's Los Angeles River Habitat Enhancement Study and Opportunities Assessment (Los Feliz Boulevard to Taylor Yard).[8] The study investigates the historic and existing conditions of the Los Angeles River corridor in the Elysian Valley, north of downtown Los Angeles. The study identifies project opportunities to enhance the existing ecological value of the study area, and how to use these opportunities as pilot projects that can support and inform the success of other large scale revitalization efforts throughout the region, including Alternative 20 of the Corps' Los Angeles River Ecosystem Restoration Integrated Feasibility Report (IFR) and the LARRMP. The study includes new data sets for the biodiversity and value of the existing habitat in the study area for native, naturalized, non-native and migratory taxa/species and identifies four alternative watershed hydrology scenarios that result from different stakeholder and infrastructure planning processes.

## c) Existing Conditions

In May 2017, a biological resources evaluation of the Project Site was conducted to determine the potential for special-status species to occur on-site. As part of the evaluation, a pedestrian survey of the Project Site and areas adjacent to the Project Site that were not already developed was conducted to identify whether there are habitats in off-site areas adjacent to the Project Site with the potential to support special-status species. Observations of all plant and wildlife species were recorded during the survey effort (see Appendix A: Floral Compendium and Appendix B: Faunal Compendium of the Biological Technical Memorandum provided in Appendix H to this Draft EIR).

Individual plants and wildlife species identified in the Floral Compendium were evaluated in the Biological Technical Memorandum based on their "special-status." For the biological resources evaluation, plants were considered "special-status" based on one or more of the following criteria:

- Listing through the FESA/CESA;
- Occurrence in the CNPS Rare Plant Inventory (Rank 1A/1B, 2A/2B, 3, or 4) (also known as the California Rare Plant Rank (CRPR); and/or

[8] *Nature Conservancy, Water Supply and Habitat Resiliency for a Future Los Angeles River: Site-Specific Natural Enhancements Opportunities Informed by River Flow and Watershed-Wide Action, December 2016.*

- Occurrence in the California Natural Diversity Database (CNDDB) inventory.[9]

Appendix C of the Biological Technical Memorandum consists of the constraints analysis of the CNDDB results pertaining to sensitive floral species. Appendix D of the Biological Technical Memorandum consists of the constraints analysis of the CNDDB results pertaining to sensitive wildlife species (the Biological Technical Memorandum and its appendices are provided in Appendix H to this EIR).

### (1) 5.7-Acre Project Site

The Project Site consists of a 5.7-acre triangle-shaped parcel of developed land currently occupied by a manufacturing facility with light manufacturing, warehousing, and film production uses and associated plantings of ornamental vegetation. No natural or semi-natural vegetation communities are present on the Project Site; plants present are non-native species, consisting of ornamental trees and shrubs. No wetland habitat was observed on-site. The vegetation provides generally low value for locally common wildlife species, especially birds, such as northern mockingbird (*Mimus polyglottos*), house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), European starling (*Sturnus vulgaris*), and mourning dove (*Zenaida macroura*).

### (2) Adjacent Segment of the Los Angeles River and State Park

#### *(a) Off-Site Slope*

The adjacent slope, immediately south of the Project Site, between the Project Site and the concrete bank of the Los Angeles River is vegetated with a mix of upland non-native and native herb-dominated species strongly adapted to human disturbance. Non-native species observed on this upper slope include acacia (*Acacia sp*.), black mustard (*Brassica nigra*), English plantain (*Plantago lanceolata*), fountain grass (*Pennisetum setaceum*), foxtail brome (*Bromus madritensis ssp. rubens*), Mexican fan palm (*Washingtonia robusta*), prickly lettuce (Lactuca serriola), Spanish broom (*Spartium junceum*), tocalote (*Centaurea melitensis*), and tree tobacco (*Nicotiana glauca*). Native species observed on this upper slope include California brittlebush (*Encelia californica*), California buckwheat (*Eriogonum fasciculatum*), Southern California black walnut (*Juglans californica*), chicory leaved stephanomeria (*Stephanomeria cichoriacea*), coast prickly pear (Opuntia littoralis), deerweed (Acmispon glaber), blue elderberry (*Sambucus nigra ssp*. *caerulea*), giant horseweed (*Erigeron canadensis*), mulefat (*Baccharis salicifolia*), and white sage (*Salvia apiana).*

Of the above-listed species, only one special-status species was observed: Southern California black walnut (*Juglans californica*; California Rare Plant Rank 4.2). Five

[9] *California Department of Fish and Wildlife, California Natural Diversity Database, accessed 2017.*

Southern California black walnut individuals were observed on the southerly offsite slope adjacent to the Los Angeles River entirely outside of the Project boundary and beyond the grading limits. These individuals occur offsite with the nearest portion of the tree canopy approximately 55 feet from the Project Site boundary and approximately 7 feet from the Los Angeles River fence line (see as Figure IV.M-1, Biological Resources Aerial Site Map and Photograph 1 in Figure IV.M-2, Biological Survey Site Photographs).

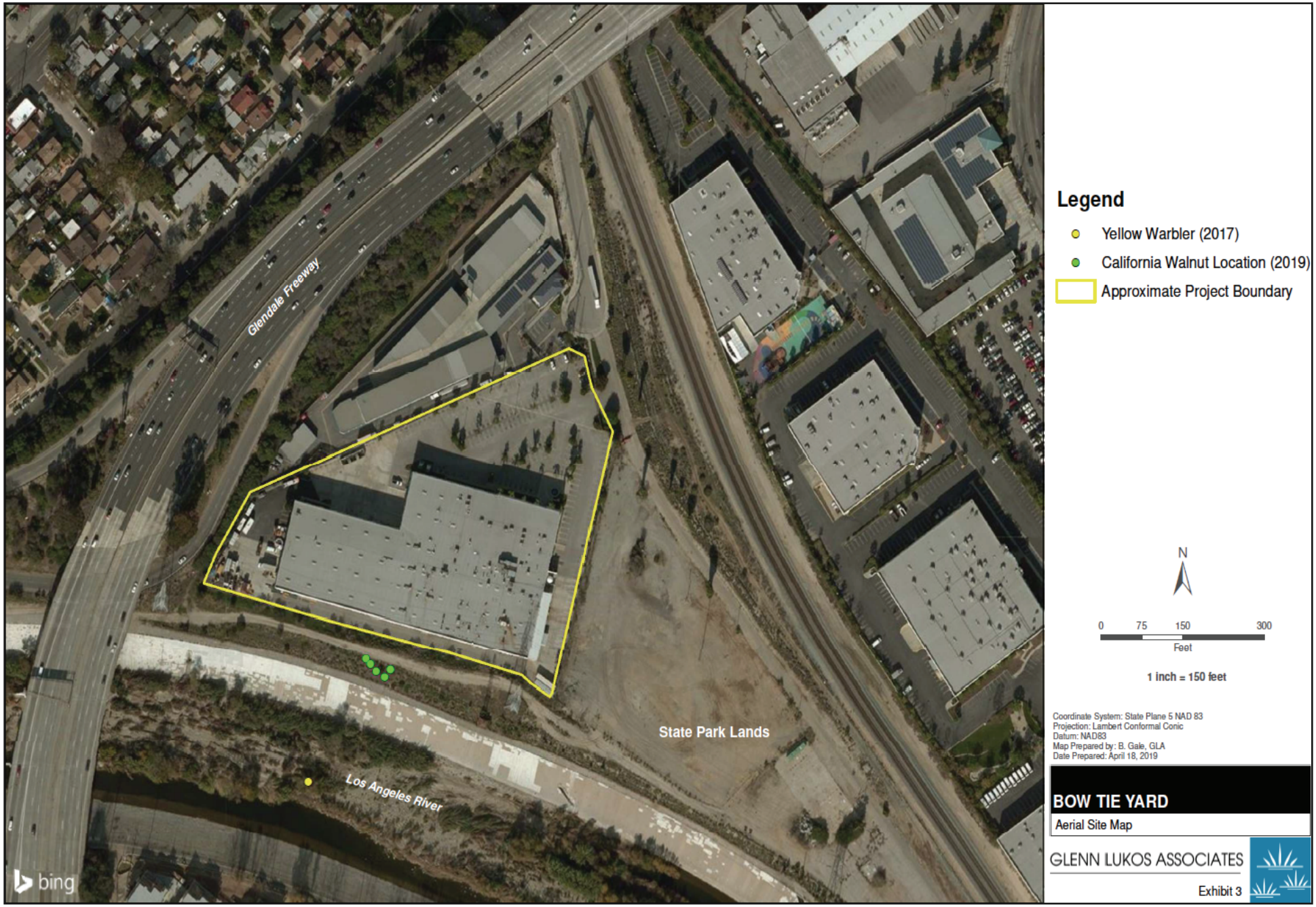
Native wildlife species expected to use this off-site slope include common reptilian species, such as western fence lizard (*Sceloporous occidentalis*); common avian species, such as California towhee (*Melozone crissalis*), house finch, lesser goldfinch (*Spinus psaltria*), mourning dove, and black phoebe (*Sayornis nigricans*); and common mammalian species, such as California ground squirrel (*Otospermophilus beecheyi*) and desert cottontail (*Sylvilagus audubonnii*).

*(b) Adjacent Segment of the Los Angeles River*

The segment of the Los Angeles River adjacent to the Project is vegetated with a mix of non-native species, native herb-dominated species strongly adapted to anthropogenic disturbance, and a small amount of riparian vegetation. Non-native species observed within the river include black mustard (*Brassica nigra*), castor bean (*Ricinus communis*), eucalyptus (*Eucalyptus sp.*), fountain grass (*Pennisetum setaceum*), foxtail brome (*Bromus madritensis ssp. rubens*), giant reed (*Arundo donax*), radish (*Raphanus sativus*), summer mustard (*Hirschfeldia incana*), and tocalote (*Centaurea melitensis*). Native species observed within the riverbed include black willow (*Salix gooddingii*) and mulefat (*Baccharis salicifolia*). See Photograph 2 in Figure IV.M-2, Biological Survey Site Photographs. None of the above-listed species are special-status species.

There are limited areas of native riparian vegetation (black willow and mulefat) present within the riverbed adjacent to an active channel. However, as depicted in Figure IV.M-1, Biological Resources Aerial Site Map, the predominance of the riparian vegetation and the active channel of the river are located on the far side of the riverbed furthest from the Project Site (ranging from approximately 250 to 275 feet from the Project Site). Historical aerial imagery indicates that this section of the Los Angeles River exhibits a fairly consistent canopy, such that dynamic flood events resulting in the scouring of vegetation are fairly uncommon.

Wildlife species observed within the segment of the Los Angeles River include American crow (*Corvus brachyrhynchos*), barn swallow (*Hirundo rustica*), black-crowned night heron (*Nycticorax nycticorax*), black phoebe (Sayornis nigricans), cliff swallow (*Petrochelidon pyrrhonota*), common yellowthroat (*Geothlypis trichas*), great




Source: Glenn Lukos Associates, April 18, 2019.

Figure IV. M-1
Biological Resources Aerial Site Map

Photograph 1: View of the slope adjacent to L.A. River Trail, over 50 feet south of the Project site. California walnut (*Juglans californica*) is visible in right-center of photo and is over 50 feet from the project site.

Photograph 2: View of the segment of the L.A. River adjacent to the Project site vegetated with a mix of non-native species, native herb-dominated species strongly adapted to anthropogenic disturbance, and a small amount of riparian vegetation.

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Site Photographs

Source: Glenn Lukos Associates, April 18, 2019.

Figure IV. M-2
Biological Survey Site Photographs

blue heron (Ardea herodias), house finch (*Haemorhous mexicanus*), mourning dove (Zenaida macroura), northern mocking bird (*Mimus polyglottos*), song sparrow (*Melospiza melodia*), Wilson's warbler (*Cardellina pusilla*), and yellow warbler (*Setophaga petechia*). No reptilian, amphibian, or mammalian species were observed during the site visit.

Of the above-listed species, only one special-status species was observed—yellow warbler (*Setophaga petechia*), which is a Federal Bird of Conservation Concern and State Species of Special Concern. The approximate location of this observation is depicted in Figure IV.M-1, Biological Resources Aerial Site Map.

Appendix D of the Biological Technical Memorandum (contained in Appendix H of this EIR) also notes the presence of potential habitat (albeit low potential) for the two-striped garter snake (*Thamnophis hammondii*) and Western pond turtle (*Emys marmorata*) within the Los Angeles River. These species were not observed on the Project Site and exhibit no potential to occur on the Project Site due to a lack of suitable habitat. Currently, the low-flow channel is located on the south side of the river such that potentially suitable habitat for these species ranges from 315 to 375 feet from the Project Site and is separated by unsuitable upland areas, including a 75-foot wide concrete slope.

*(c) Adjacent State Parks Land*

The portion of the State Parks land adjacent to the Project Site has been previously graded, and the substrate is currently highly compacted due to past industrial uses. As a result, this area is mostly bare, with sparse non-native trees and ruderal vegetation with areas consisting of gravel substrate (see Figure IV.M-1, Biological Resources Aerial Site Map). The vegetation provides generally low value for locally common wildlife species, especially birds. No burrows of fossorial animals were observed within the adjacent portion of the State Parks land, and no such burrows are expected to occur due to the high degree of soil compaction. Additionally, the sparse trees on-site do not provide sufficient roosting habitat for bats and are of generally low value for native birds.

# 3. Project Impacts

## a) Thresholds of Significance

Pursuant to Appendix G of the State CEQA Guidelines, a project would result in a significant adverse impact upon biological resources if the project would:

***Threshold (a): Have a substantial adverse effect, either directly or through habitat modifications, on any species identified***

***as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.***

***Threshold (b):*** ***Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.***

***Threshold (c):*** ***Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.***

***Threshold (d):*** ***Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.***

***Threshold (e):*** ***Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.***

***Threshold (f):*** ***Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions.

The Thresholds Guide provides that a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;

- Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species;
- The alteration of an existing wetland habitat;
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

## b) Methodology

Methods of the biological study included a review of relevant literature, field surveys, and a Geographical Information System (GIS)-based analysis of vegetation resources.[10] The analysis is consistent with accepted scientific and technical standards and survey guideline requirements issued by the USFWS, the CDFW, the CNPS, and other applicable agencies/organizations.

The field study focused on specific objectives that would comply with CEQA requirements, including (1) general reconnaissance survey, (2) general biological surveys; (3) habitat assessments for special-status plant species; and (4) habitat assessments for special-status wildlife species. Additionally, the field study also considered the Thresholds Guide and evaluated (1) the condition of the biological resources on the Project Site; (2) the condition of the biological resources associated with the adjacent segment of the Los Angeles River and the adjacent State Park land; and (3) the potential direct and indirect impacts on off-site biological resources.

Observations of all plant and wildlife species were recorded during the general biological survey and are included as Appendix A: Floral Compendium and Appendix B: Faunal Compendium. (See Appendix H to this EIR). The Non-Protected Tree Report, which was presented in the Initial Study, is provided in Appendix A.1 to this EIR.

## c) Project Design Features

**Project Design Feature BIO-PDF-1**: Prior to issuance of a building permit, the Project Applicant shall coordinate with the City and replace any non-protected significant trees that are 8 inches or more in diameter at breast height (dbh), that would be removed during the Project construction period, at a 1:1 ratio with a minimum 24-inch box tree. Replacement trees shall be planted on-site.

**Project Design Feature BIO-PDF-2**: A qualified biologist monitor shall review landscaping and irrigation systems that are adjacent to the replacement trees to

[10] *Appendices C and D of the Biological Technical Memorandum consist of a review of the CNDDB pertaining to floral and wildlife species, respectively.*

determine whether such landscaping and irrigation systems are compatible for the survival of the replacement trees. All newly planted trees within the Project Site must be appropriately sized, stalked, and tied, provided with a watering moat and shall be properly watered and maintained.

**Project Design Feature BIO-PDF-3**: The proposed landscape palate shall consist of native plant species as identified in the Los Angeles County, Department of Public Works, Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes, January 2004.

**Project Design Feature BIO-PDF-4**: To ensure compliance with the MBTA and avoid potential impacts to nesting avifauna, vegetation on the Project Site will be removed outside the avian breeding season (March 15 to August 31). If vegetation removal occurs during this period, a biologist experienced in performing nesting bird surveys will survey shrubs and trees to be removed not more than three days prior to removal. If active nests are identified, shrubs or trees with active nests will not be removed until the biologist has confirms that the nest is no longer active and that the fledglings are no longer dependent on the nest.

## d) Analysis of Project Impacts

The CEQA Initial Study Checklist contained in Appendix A to this Draft EIR concluded that impacts to biological resources would be less than significant in response to CEQA Checklist Questions a, b, c, e and f. In response to CEQA Checklist Question d, the Initial Study conclude there would be no impact. Based on several comments provided in response to the NOP expressing concern for biological impacts on a Project Site that is located adjacent to the Los Angeles River corridor, this Biological Resources Section was added to the scope of the EIR to address Checklist Questions a, b, c, e, and f and update the impact discussion for Checklist Question d. Therefore, each of the CEQA Appendix G Thresholds are addressed below.

***Threshold (a): Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

### (1) Impact Analysis

As discussed in Subsection 2.(c), Environmental Conditions, presented above, based on a general biological site reconnaissance conducted in June 2017 for the proposed

Project, no special-status species or habitats (e.g., roosting habitat for bats or native birds) occur or have potential to occur on the Project Site due to the heavily developed nature of the site, the absence of natural vegetative communities, and the overall lack of substantial ornamental canopy. As no special-status species or habitats occur or are expected to occur at the Project site, the Project would not result in the loss of individuals or the reduction of existing habitat for listed or otherwise special-status species. While five special-status species were observed off-site adjacent to the Project Site (Southern California black walnut [CNPR 4.2] and yellow warbler [Federal Bird of Conservation Concern and State Species of Special Concern]), neither would be impacted by the Project, and, therefore, there would be no significant impacts on these species associated with the proposed Project.

The five Southern California black walnut individuals occur on a disturbed slope adjacent to the Project Site with the nearest portion of the canopy occurring more than 50 feet from the Project boundary, as depicted in Figure IV.M-1, Biological Resources Aerial Site Map. However, as the nearest canopy of these individuals occur entirely outside the Project boundary and beyond the grading limits (including any part of the canopy), no impacts to the Southern California black walnut would occur during Project construction or operation. Additionally, the CNPS/CRPR Rank of "4" is considered a "watch list," where List 4 species are currently thought to be limited in distribution or range whose vulnerability or susceptibility to threat is currently low. Therefore, impacts to small numbers of this species, particularly in settings where the plants are on disturbed sites, would not be considered significant.

The yellow warbler was observed within the adjacent segment of the Los Angeles River but was not observed within the Project Site boundaries. Because this off-site segment of the Los Angeles River is already highly disturbed and subject to substantial noise due to its proximity to SR-2 and light due to adjacent existing development, no additional impacts to the yellow warbler associated with the Project are expected to occur during Project construction or operation. It is also important to note that while the yellow warbler is listed as a Federal Bird of Conservation Concern and State Species of Special Concern, it remains common and widespread, breeding throughout North America and portions of South America. As such, the conservation status of this species would not, in and of itself, result in a finding of significant impact, particularly given the complete absence of suitable foraging and/or nesting habitat on the developed 5.7-acre Project Site.

Appendix D of the Biological Resources Technical Memorandum also notes the presence of potential habitat (albeit low potential) for the two-striped garter snake and western pond turtle within the Los Angeles River. Currently, the low-flow channel is located on the south side of the Los Angeles River such that potentially suitable habitat

for these species ranges from 315 to 375 feet from the Project Site and is separated by unsuitable upland areas, including a 75-foot-wide concrete slope. Due to this separation of potential habitat from the Project Site, there is no potential for impacts to these species as a result of Project construction or operation.

Based on the above, the proposed Project would result in a less-than-significant impact upon the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected or candidate species or a Species of Special Concern or federally listed critical habitat. ***As such, there would be no significant impacts to candidate, sensitive, or special status species associated with Project construction or operation due to disturbance of normal species behaviors and diminishment of long-term survival of sensitive species.***

### (2) Mitigation Measures

Impacts on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Impacts on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS would be less than significant without mitigation.

***Threshold (b): Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

### (1) Impact Analysis

As discussed in Subsection 2.(c), Environmental Conditions, above, no riparian habitat or other sensitive natural communities exist on the Project Site; therefore, the Project would not result in the alteration of an existing wetland habitat. While the Project Site is adjacent to the Los Angeles River, which supports limited areas of native riparian habitat, Project construction or operation would not impact any areas of riparian habitat either directly through grading or indirectly through light or noise as the areas of riparian habitat are approximately 250 to 275 feet from the Project Site. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP would identify Best Management Practices (BMPs) to be implemented to

ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction and operational activities. Further, the proposed Project would be required to implement an LID Plan (during the Project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. As no locally-designated species, habitats, or riparian plant communities occur are expected to occur on-site, the Project would not result in the loss of individuals or the reduction of existing habitat. The proposed Project would result in a less-than-significant impact related to loss of any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. Furthermore, as noted in BIO-PDF-3, the proposed landscaping palate shall consist of native plant species consistent with the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. ***Therefore, there would be no significant impacts to locally-designated species, habitats, or plant communities associated with the Project.***

### (2) Mitigation Measures

Impacts on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Impacts on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS would be less than significant without mitigation.

***Threshold (c): Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

### (1) Impact Analysis

No wetland habitats exist at the Project Site; therefore, Project construction or operation would not result in the alteration of an existing wetland habitat. The proposed Project would not impact the Los Angeles River, which exhibits aquatic habitats. As discussed above, a SWPPP would be prepared and implemented for the proposed Project in compliance with the requirements of the Construction General Permit to protect the Los Angeles River from any runoff pollutants. The SWPPP would identify BMPs to be

implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction and operational activities. Further, the proposed Project would be required to implement an LID Plan (during the Project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Therefore, the Project would not result in significant impacts on wetlands or other aquatic resources. As noted above under Threshold (a), there is an approximately 155-foot setback from the areas with natural substrate and vegetation within the Los Angeles River, including a 75-foot wide concrete slope, and the mature native riparian habitat is a minimum of 250 feet from the Project Site.

Given the setbacks from the Los Angeles River, the proposed Project would not require permits or approvals from the Corps pursuant to Section 404 of the federal Clean Water Act as the proposed Project exhibits no potential for discharge of dredge or fill material into Section 404 jurisdiction; CDFW pursuant to Section 1602 of the California Fish and Game Code for alteration of the bed and bank of the Los Angeles River; or the Regional Water Quality Control Board pursuant to Section 401 of the federal Clean Water Act or the Report of Waste Discharge Requirements pursuant to the Porter Cologne Act.

It should also be noted that the adjacent segment of the Los Angeles River is mapped on the USFWS National Wetland Inventory (NWI) website with the following wetland designations: Palustrine Scrub-Shrub, Seasonally-Flooded, Excavated; Palustrine Scrub-Shrub, Emergent Persistent, Seasonally Flooded, Excavated; Riverine, Lower Perennial, Unconsolidated Shore, Seasonally Flooded, Excavated; and Riverine, Lower Perennial, Unconsolidated Bottom, Permanently Flooded, Excavated[11,12] (see Figure IV.M-3, National Wetlands Inventory). The NWI Wetlands mapper is designed to deliver easy-to-use, map-like views of America's Wetland resources and fulfills the USFWS's strategic plan for the development, revision and dissemination of wetlands data and information to resource managers and the public. The wetlands displayed on the Wetlands Mapper show wetland type and extent using a biological definition of

[11] *https://www.fws.gov/wetlands/data/mapper.html. The NWI website includes the following information regarding the information provided on the website. "The wetland information displayed at this site show wetland type and extent using a biological definition of wetlands.* ***There is no attempt to define the limits of proprietary jurisdiction of any Federal, state, or local government, or to establish the geographical scope of the regulatory programs of government agencies.****" [Emphasis in the original]. Furthermore, the following is also provided on the NWI Website: Base cartographic information used as part of this Wetlands Mapper has been provided through third party products. The FWS does not maintain, and is not responsible for the accuracy or completeness of the base cartographic information.*

[12] *Wetland habitat type definitions, descriptions and use the classification system can be found in Classification of Wetlands and Deepwater Habitats of the United States (Cowardin, et al, 2013)*.

Source: US Fish and Wildlife Service, National Wetlands Inventory, data desktop Mobil Viewer, October 15, 2018 (accessed April 11, 2019).

Figure IV.M-3
National Wetlands Inventory

wetlands. There is no attempt to define the limits of proprietary jurisdiction of any federal, state, or local government, or to establish the geographical scope of the regulatory programs of government agencies. USFWS has no regulatory authority over waters of the U.S., which are regulated by the Corps pursuant to Section 404 of the federal Clean Water Act. As already noted, the proposed Project would not result in any impacts to jurisdictions regulated by the Corps, and, thus, the NWI mapping does not impose any regulatory constraints on the proposed Project. ***Therefore, no impacts to federally protected wetlands would occur with the implementation of the proposed Project.***

### (2) Mitigation Measures

No impact would occur to federally protected wetlands. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

No impact would occur to federally protected wetlands without mitigation.

***Threshold (d): Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

### (1) Impact Analysis

As no special-status species or habitats occur at the Project Site, the Project has no potential to interfere with habitat such that normal behaviors are disturbed and chances for long-term survival of sensitive species is diminished. The five Southern California black walnut occur over 50 feet from the property line on a disturbed slope adjacent to the Project Site, entirely outside the Project Site and beyond the grading limits (including any part of the tree canopy). Therefore, these trees would not be impacted by the proposed Project. The yellow warbler occurs within riparian habitat between 250 and 275 feet from the Project Site and is already likely affected by noise and/or light associated with the adjacent SR-2 and development occurring on the southern side of the Los Angeles River. Construction of the Project would not add substantially to the existing noise and/or light levels and would be temporary. As noted, while the yellow warbler is listed as a Federal Bird of Conservation Concern and State Species of Special Concern, it remains common and widespread, breeding throughout North America and portions of South America. Additionally, as noted in the State Parks response letter to the NOP, the Los Angeles River is within the migratory route for the

Pacific Flyaway.[13] Buildings B, C, and D of the proposed Project would contain setbacks and an additional cement fire lane along the southern property line fronting the LADWP easement adjacent to the Los Angeles River, and are further separated from the riparian habitat by an existing 75-foot wide concrete slope within the Los Angeles River Channel. Since the Project Site is not located within the boundaries of the Los Angeles River, and would have no direct impacts upon wetlands or riparian habitat, the proposed Project would have no impact to the migratory route of the Pacific Flyaway. As such, there would be no significant impacts to this species associated with the Project as (1) there is no suitable foraging and/or nesting habitat on the Project Site; (2) the Project Site is already fully developed; and (3) the existing condition of off-site habitat within the Los Angeles River is already heavily disturbed by adjacent development and the adjacent freeway.

While the Project Site supports only limited amounts of ornamental vegetation, there is at least limited potential for impacts to nesting by common species of avifauna that would be regulated pursuant to the Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5 and 3513 of the California Fish and Game Code. In order to comply with the MBTA and ensure avoidance of impacts to nesting avifauna, vegetation on the Project Site will need to be removed outside the avian breeding season (March 15 to August 31). If vegetation removal occurs during this period, a biologist experienced in performing nesting bird surveys will need to survey shrubs and trees to be removed not more than three days prior to removal. If active nests are identified, shrubs or trees with active nests will not be removed until the biologist has confirmed that the nest is no longer active and that the fledglings are no longer dependent on the nest (see BIO-PDF-4, above).

***Therefore, for the reasons discussed above, the proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and no impact would occur.***

### (2) Mitigation Measures

Impacts on the movement of any native resident or migratory fish or wildlife species or wildlife corridors would be less than significant. Therefore, no mitigation measures are required.

[13] *California Natural Resources Agency, Department of Parks and Recreation, Angeles District, Initial Study and Notice of Preparation for Bow Tie Yard Lofts Project (Case Number ENV-2016-2862-EIR), March 13, 2017.*

### (3) Level of Significance After Mitigation

Impacts on the movement of any native resident or migratory fish or wildlife species or wildlife corridors would be less than significant without mitigation.

***Threshold (e): Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

### (1) Impact Analysis

The Project Site is improved with a light manufacturing/warehouse/film production building and paved surface parking. There are no protected tree species located on the Project Site.[14] Additionally, there are no street trees under the control of the Urban Forestry Department that would be impacted by the proposed Project.[15] Therefore, the proposed Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance or require any street tree removal permits from the City of Los Angeles Urban Forestry Division. However, it is anticipated that all 55 non-protected trees on-site would be removed during the construction of the proposed Project. Project Design Feature BIO-PDF-1 requires the proposed Project to replace all significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project Site proposed for removal with a 1:1 ratio. Project Design Feature BIO-PDF-2 requires a qualified biologist monitor to review landscaping and irrigation systems that are adjacent to the replacement trees to determine whether such landscaping and irrigation systems are compatible for the survival of the replacement trees. All newly planted trees within the Project Site must be appropriately sized, stalked, and tied, provided with a watering moat and shall be properly watered and maintained. ***As there are no protected tree species located on the Project Site, the proposed Project would not conflict with any local policies or ordinances protecting biological resources. Impacts in this regard are less than significant.***

### (2) Mitigation Measures

Impacts related to local policies or ordinances protecting biological resources would be less than significant. Therefore, no mitigation measures are required.

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[14] *Greg Applegate, ASCA, ASLA, Arborgate Consulting, Inc., Non-Protected Tree Report, 2800 Casitas, Los Angeles, June 20, 2016. (See Appendix A.1 of this DEIR).*

[15] *Ibid.*

### (3) Level of Significance After Mitigation

Impacts related to local policies or ordinances protecting biological resources would be less than significant without mitigation.

***Threshold (f): Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

### (4) Impact Analysis

The Project Site is not located in or adjacent to an existing or proposed Significant Ecological Area.[16] Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. As discussed in the Initial Study, the Project Site is located within the RIO District and is located north of the Los Angeles River. The RIO District was established by Ordinance No. 183145 and became effective August 20, 2014. As further discussed in Section IV.F, Land Use and Planning, the development of the proposed Project would comply with the development standards and guidelines for development within the RIO district. While not specifically labeled a habitat conservation plan, the purpose of the RIO District Plan is to: (1) support the goals of the Los Angeles River Revitalization Master Plan; (2) contribute to the environmental and ecological health of the City's watersheds; (3) establish a positive interface between river adjacent property and river parks and/or greenways; (4) promote pedestrian, bicycle and other multi-modal connection between the river and its surrounding neighborhoods; (5) provide native habitat and support local species; (6) provide an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area; (7) provide safe, convenient access to and circulation along the river; (8) promote the river identity of river adjacent communities; and (9) support the Low Impact Development Ordinance, the City's Irrigation Guidelines, and the Standard Urban Stormwater Maintenance Program. Accordingly, certain development standards imposed by the RIO District Ordinance would promote conservation efforts and minimize impacts upon plant and wildlife within the Los Angeles River corridor. For example, Section 13.17 F(1), of the RIO District Ordinance requires approximately 75 percent of the newly landscaped areas to be planted with a combination of native trees, plants and shrubs, or species defined as Watershed Wise, or species in accordance with the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Section 13.17 F(3), of the RIO District Ordinance requires all site and building mounted lighting to be designed such that it produces a maximum initial luminance value no

[16] *NavigateLA, Significant Ecological Area layer: http://navigatela.lacity.org/navigatela/*

greater than 0.20 horizontal and vertical foot candles at the site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the site. Compliance with these design standards would further reduce the proposed Project's less than significant impacts upon biological resources. As such, the proposed Project would not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. ***Therefore, a less-than-significant impact would occur with the development of the proposed Project.***

### (5) Mitigation Measures

The proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no mitigation measures are required.

### (6) Level of Significance After Mitigation

Impacts related to conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan would be less than significant without mitigation.

## e) Cumulative Impacts

### (1) Impact Analysis

In accordance with Section 15130(b)(1)(A)(B) of the CEQA Guidelines, an adequate discussion of significant cumulative impacts can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes conditions contributing to the cumulative effect. The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. For purposes of assessing the cumulative impacts on biological resources, the analysis below is appropriately based on a combination of the plan-based approach and the list-based approach to determine the Project's contributing effect on potential cumulative impacts.

The proposed Project, in combination with the construction and operation of the 17 related projects (see Section III, Environmental Setting) would result in the continued redevelopment and revitalization of the surrounding area. The list of related projects was prepared based on information obtained from a variety of sources, including the City of Los Angeles Department of City Planning, LADOT, other studies and reports,

and field verification and observation. The geographic scope of the area is generally based on the distance to the Project Site from the related project, and proximity to natural habitat areas such as the Los Angeles River Corridor. With respect to biological resources, the proposed Project would have the potential to result in cumulative impacts to biological resources only with respect to those projects that are located along or in proximity to the Los Angeles River corridor. Related Project Nos. 15 (Bow Tie Project), 16 (Taylor Yard Bikeway/Pedestrian Crossing over the Los Angeles. River), and 17 (G2 Parcel – Taylor Yard), are located directly along the Los Angeles River and have the potential to generate cumulative impacts. However, these related projects are state and local agency-sponsored projects that are intended to improve habitat and urban/wildlife interface along the Los Angeles River corridor. As such, they are intended to have a net beneficial impact with respect to long term impacts to biological resources. The remaining related projects that are within the vicinity of the Project Site and occur along the Los Angeles River corridor (such as Related Project No. 1 (retail development at 1555 N. San Fernando Road), and 4 (mixed-use project located at 1901 W. Blake Avenue) are located on infill lots and would not have the potential to generate cumulative impacts to habitat or biological resources. These related projects, along with the remaining related project that are not located in proximity to the Los Angeles River corridor, are generally isolated in geographic extent and limited in scope, such that the combined impacts of the project and these other infill developments would not contribute in any considerable manner to any significant cumulative impacts on biological resources. Moreover, each related project would be required to comply with the City's protected and non-protected tree regulatory compliance measures and existing migratory bird protection regulatory compliance measure, which would ensure that the related projects have a less-than-significant impact to biological resources, primarily along the Los Angeles River. ***Therefore, the construction and operation of the proposed Project and related projects would have a less-than-significant cumulative impact to biological resources.***

### (2) Mitigation Measures

Cumulative impacts with regard to biological resources would be less than significant. Thus, no mitigation measures would be necessary.

### (3) Level of Significance After Mitigation

Cumulative impacts related to biological resources would be less than significant without mitigation.

# IV. Environmental Impact Analysis

# N. Tribal Cultural Resources

## 1. Introduction

The following section focuses on the proposed Project's potential to result in significant impacts upon tribal cultural resources. The findings presented in this section are based on the information presented in the following technical report, which is provided in Appendix K to this Draft EIR: SWCA, *Tribal Cultural Resources Assessment for the 2800 Casitas Avenue Project, City of Los Angeles, California*, July 2019.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) Federal

##### *(a) The Native American Graves Protection and Repatriation Act*

The Native American Graves Protection and Repatriation Act (NAGPRA), (United States Code (USC) 3001 *et seq.*), describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation. The statute provides protections for the inadvertent discovery of Native American burial sites and more careful control over the removal of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony on Federal and tribal lands. NAGPRA requires that Indian tribes or Native Hawaiian organizations be consulted whenever archeological investigations encounter, or are expected to encounter, Native American cultural items or when such items are unexpectedly discovered on Federal or tribal lands. Excavation or removal of any such items also must be done under procedures required by the Archaeological Resources Protection Act.

## (2) State

### *(a) Native American Historic Resource Protection Act (Assembly Bill 52)*

Recognizing that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources, the Native American Historic Resource Protection Act (Assembly Bill 52, or AB 52) took effect July 1, 2015, incorporating tribal consultation and analysis of impacts to tribal cultural resources into the CEQA process. AB 52 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. Section 4 of AB 52 adds Sections 21074(a) and (b) to the PRC, which address tribal cultural resources and cultural landscapes. PRC Section 21074(a) defines tribal cultural resources as one of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    a. Included or determined to be eligible for inclusion in the California Register of Historical Resources.

    b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Once an application for a project is completed or a public agency makes a decision to undertake a project, the lead agency has 14 days to send formal notification to notify Native American tribes designated by the NAHC as having traditional and cultural affiliation with a given project area, and those Native American Tribes that previously requested in writing to be notified by the lead agency (PRC Section 21082.3.1[b][d]). The notification shall include a brief description of the proposed project, the location, contract information for the agency contact, and notice that the tribe has 30 days to request (in writing) consultation (PRC Section 21082.3.1[d]). Consultation must be initiated by the lead agency within 30 days of receiving any California Native American tribe's request for consultation. Furthermore, consultation must be initiated prior to the release of a negative

declaration, mitigated negative declaration, or environmental impact report for a project (PRC Section 21082.3.1[b][e]).

Pursuant to Government Code Sections 6254 and 6254.10, and PRC Section 21082.3(c), information submitted by a California Native American tribe during consultation under AB 52 shall not be included in the environmental document or otherwise disclosed to the public by the lead agency, project applicant, or the project applicant's agent, unless written permission is given. Exemptions to the confidentiality provisions include any information already publicly available, in lawful possession of the project applicant before being provided by the tribe, independently developed by the project applicant or the applicant's public agent, or lawfully obtained by a third party (PRC Section 21082.3[c]).

Section 1(a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). Any mitigation measures agreed upon in the consultation conducted pursuant to Section 21080.3.2 shall be recommended for inclusion in the environmental document and the adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact upon tribal cultural resources (PRC Section 21082.3[a]).

*(b) California Health and Safety Code Section 7050.5*

The disposition of burials falls first under the general prohibition on disturbing or removing human remains under California Health and Safety Code Section 7050.5. More specifically, remains suspected to be Native American are treated under CEQA as established in CEQA Guidelines Section 15064.5; PRC Section 5097.98 illustrates the process to be followed if remains are discovered. If human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:
  1104 N. Mission Road
  Los Angeles, CA 90033
  (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday), or
  (323) 343-0714 (after hours, Saturday, Sunday, and holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American.
- The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.

## b) Existing Conditions

### (1) Historical Context

A detailed pre-historic and historic description of the Project Site and broader geographic area, including an ethnographic overview of the California Native American tribes that are known to have inhabited the area is provided in the Tribal Cultural Resources Assessment for the proposed Project. The Project Site is within the Los Angeles Basin, which is an area historically occupied by the Gabrielino/Tongva.[1] Surrounding Native American groups included the Chumash and Tataviam/Alliklik to the north, the Serrano to the east, and the Luiseño/Juaneño to the south. There is well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade.

The name "Gabrielino" (sometimes spelled Gabrieleno or Gabrieleño) denotes those people who were administered by the Spanish from Mission San Gabriel. This group is now considered a regional dialect of the Gabrielino language, along with the Santa Catalina Island and San Nicolas Island dialects.[2] In the post-European contact period, Mission San Gabriel included natives of the greater Los Angeles area, as well as members of surrounding groups, such as Kitanemuk, Serrano, and Cahuilla.

In general, it has proven very difficult or impossible to establish definitively the precise location of Native American villages occupied in the Ethnohistoric period.[3] Although the precise location of any given village is subject to much speculation, it is clear the banks of the major stream courses, such as the Los Angeles River, were home to many Gabrielino/Tongva villages throughout the greater Los Angeles area.[4] Similarly, foraging

[1] *Bean and Smith 1978:538; Kroeber 1925:Plate 57.*
[2] *Bean and Smith 1978:538.*
[3] *McCawley 1996:31–32.*
[4] *McCawley 1996; See Figure 8 in the Tribal Cultural Resources Assessment for the Casitas Avenue Project, City of Los Angeles, CA, contained in Appendix K to this EIR.*

and seasonal camps surrounding springs would have almost certainly been a regular occurrence and correlate more regularly with archaeological assemblages.[5] The closest ethnographically documented village to the Project Site is Maawnga,[6] which has been located within the "Rancho de los Felis" (what is now portions of Hollywood, Los Feliz, Griffith Park, and Elysian Park).[7] Other ethnographically documented Gabrielino communities near the Project Site include Kaweenga to the northwest and Yaanga to the southeast. Kaweenga, from which the modern-day Cahuenga derives its name, was located within the Cahuenga Pass,[8] near or possibly at the Campo de Cahuenga site, near present-day Universal Studios, several miles northwest of the Project Site. As with the original Los Angeles pueblo, it is likely that Yaanga was relocated from time to time due to major shifts of the Los Angeles River during years of intense flooding. An exhaustive review of the potential locations indicated that most of them were located within several blocks of the pueblo plaza.[9] A second village, known as Geveronga, has also been described in ethnographic accounts as immediately adjoining the Pueblo of Los Angeles, though much like Yaanga, its location can only be inferred from ethnographic information.[10]

European contact with the Gabrielino occurred as early as 1542 with the Spanish expedition led by Juan Rodriguez Cabrillo, followed by Sebastián Vizcaíno in 1602, both of who visited Santa Catalina Island. Colonization of Gabrielino lands did not begin in earnest until after the inland expedition led by Gaspar de Portolá in 1769; by 1771, four missions had been constructed in the region, including Mission San Gabriel, located in Los Angeles County and founded in September 1771.[11] The Franciscan missions, charged with converting the Native Americans to Christianity and acculturating them to European society and economy, began relocating them to mission grounds.

5 *Dillon 1995:24–25.*
6 *Alternative spellings and names include Maugna, Maawnga, Moonga, Moomga, Momonga, Maungna, Mau, and Mauga (McCawley, 1996:55).*
7 *Reid, 1852:8.*
8 *McCawley, 1996:40.*
9 *Dillon, 1994.*
10 *McCawley, 1996:57.*
11 *Engelhardt 1927.*

# 3. Project Impacts

## a) Thresholds of Significance

In accordance with the State Guidelines Appendix G (Appendix G), the Project would have a significant impact related to tribal cultural resources if it would:

***Threshold (a):*** ***Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

***i. Listed or eligible for listing in the California Register of Historical Resources, or in local register of historical resources as defined in Public Resources Code section 5020.1(k), or***

***ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision C of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

For this analysis, the Appendix G Thresholds are relied upon. The L.A. CEQA Thresholds Guide (Thresholds Guide) does not identify any criteria for the evaluation of significant impacts to tribal cultural resources.

## b) Methodology

The methods and analysis in assessing the sensitivity for the Project Site to support significant Native American tribal cultural resources included a California Historical Resources Information System (CHRIS) records search, a Sacred Lands File (SLF) records search, archival research, and AB 52 consultation with Native American tribal representatives who requested to be consulted on such matters.

### (1) California Historical Resources Information System (CHRIS) Records Search

A confidential search of the CHRIS was conducted at the SCCIC, located on the campus of California State University, Fullerton, to identify previously documented cultural resources within a 0.5-mile (0.8-km) radius of the Project Site. The SCCIC maintains records of previously documented cultural resources (including those that meet the definition of a tribal cultural resource) and technical studies; it also maintains copies of the Office of Historic Preservation's portion of the Historical Resources Inventory.

### (2) Sacred Lands File (SLF) Records Search

The NAHC provided the results of an SLF records search conducted for the Project Site and surrounding environs. The NAHC results letter indicated that there are no sacred sites in the SLF documented within the Project Site. The letter notes that the SLF and CHRIS are not exhaustive inventories of resources that may be present in any given area and that tribes may uniquely possess information on the presence of an archaeological or tribal cultural resource. The NAHC provided a list of five Native American contacts and suggested contacting them to provide information on sacred lands that may not be listed in the SLF. Each of these individuals were already included in the City's AB 52 notification list, and all additional outreach was conducted as part of compliance with AB 52 (PRC Section 21082.3). The SLF response letter is provided in Appendix K.

### (3) Archival Research

SWCA reviewed property-specific historical and ethnographic research to identify information relevant to the Project Site. Research focused on a variety of primary and secondary materials relating to the history and development of the Project Site, including historical maps, aerial and ground photographs, ethnographic reports, and other environmental data. Historical maps drawn to-scale were georeferenced using ESRI ArcMAP v10.5 to show precise relationships to the Project Site. Sources consulted included the following publicly accessible data sources: City of Los Angeles Office of Historic Resources (SurveyLA); Huntington Library Digital Archives; Library of Congress; Los Angeles Public Library Collection; Sanborn Fire Insurance Company Maps (Sanborn maps); USGS historical topographic maps; University of California, Santa Barbara Digital Library (aerial photographs); and University of Southern California Digital Library. In addition to the above, technical reports prepared for the Project, including the geotechnical study by LGC Geotechnical, Inc., were reviewed.[12]

[12] *Zellmer and Boratynec, 2017.*

### (4) AB 52 Consultation

As lead agency, the City of Los Angeles Department of City Planning mailed letters on November 16, 2016, to the 10 listed Native American tribes included on the City's AB 52 notification list pursuant to PRC Section 21082.3. One response was received on December 1, 2016, from the Gabrieleño Band of Mission Indians—Kizh Nation, who requested that a Tribal Monitor be present to observe any ground disturbances. As a result of the AB 52 pre-consultation process, Jonathan Chang, representing the City of Los Angeles Department of City Planning, and Andrew Salas of the Gabrieleño Band of Mission Indians—Kizh Nation, came to a verbal agreement that a Tribal Monitor would be present to conduct a 1-day monitoring spot-check during the grading and excavation phase. Confirmation of this verbal agreement was received by the City on August 22, 2017. This verbal agreement has been incorporated into the proposed Project as a Project Design Feature (see TCR-PDF-1, above). Notification letters and responses are included in Appendix K.

### (5) Sensitivity Assessment

In circumstances where a known tribal cultural resource is not present, the potential for the presence of an undocumented resource (i.e., sensitivity) is assessed. That determination considers historical use of the Project vicinity broadly and the physical setting, specifically including an assessment of whether the setting is capable of containing buried material. Lacking any data specifically gathered to assess the presence or absence of material below the surface, the resulting sensitivity is by nature qualitative, ranging along a spectrum of increasing probability for encountering such material, designated here as low, moderate, and high. In general, for areas in which there are few indicators of prehistoric habitability based on proximity to natural features (e.g., topography, perennial water source) or known sites, and poor physical integrity within the project site (e.g., high levels of disturbances from recent development), the resulting sensitivity assessment would be low. For areas near natural features or known sites affiliated with Native Americans that also potentially retain sediments dated to the approximate time period of that activity, the resulting sensitivity assessment would be either moderate or high.

## c) Project Design Features

The following project design feature is proposed in response to the consultation request by the Gabrieleño Band of Mission Indians.

**Project Design Feature TCR-PDF-1** Pursuant to the verbal agreement reached during the AB 52 consultation process between the Department of City

Planning and the Gabrieleño Band of Mission Indians, a Native American Monitor from the Gabrieleño Band of Mission Indians shall conduct a one-day spot check survey during the grading and earthwork phase.

## d) Analysis of Project Impacts

***Threshold (a):*** ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

***i. Listed or eligible for listing in the California Register of Historical Resources, or in local register of historical resources as defined in Public Resources Code section 5020.1(k), or***

***ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision C of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

### (1) Impact Analysis

The results of the records search at the SCCIC indicate that 14 cultural resource studies have previously been conducted within 0.5 mile (0.8 km) of the Project Site, none of which included the Project Site directly. Several of the studies were conducted within the railroad right-of-way or along San Fernando Road, directly west of the Project Site. However, these studies were either conducted as archaeological assessments (i.e., they did not include field surveys and subsurface testing, or fieldwork was conducted after the respective study areas had already been impacted by historical developments), so that any tribal cultural resources that may have been identified were likely destroyed. The studies focusing on the built environment or that have a planning-level focus are of limited relevance to the current study. No known tribal cultural resources were identified in the CHRIS records search. Three built-environment resources were identified within a 0.5-mile (0.8-km) radius of the Project Site, which lacked any archaeological components that could meet the definition of a tribal cultural resource. Considering the information available on Native American settlement patterns for the Glendale Narrows, historical disturbances, and soil data for the Project Site, the Project Site was found to have a low sensitivity for containing unidentified tribal cultural resources.

In response to the AB 52 Consultation request, the City of Los Angeles Department of City Planning received one response letter from the Gabrieleño Band of Mission Indians (contained in Appendix K). Citing the fact that the Project Site lies in a broad area where the ancestral territories of the Kizh (Kitc) Gabrieleño's villages adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods, the Gabrieleño Band of Mission Indians requested that one of their certified Native American Monitors conduct a 1-day on-site spot monitoring survey during the earthwork phase to verify the presence or absence of any cultural resources, which may be affected during construction or development. This request was verbally agreed to by Department of City Planning staff and has been incorporated into the Project as a Project Design Feature (see TCR-PDF-1, above). No further evidence was provided to indicate the presence of any known cultural sites or resources within the Project Site or immediate Project area. ***With incorporation of TCR-PDF-1 and compliance with applicable California regulations with regards to human remains, the proposed Project would have a less-than-significant impact upon California Native American tribal cultural resources.***

### (2) Mitigation Measures

Project impacts related to tribal cultural resources would be less than significant with compliance with regulatory requirements. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Project impacts related to tribal cultural resources would be less than significant without mitigation.

## e) Cumulative Impacts

### (1) Impact Analysis

The proposed Project, in combination with the construction and operation of the 14 related projects (see Section III, Environmental Setting), would result in the continued redevelopment and revitalization of the surrounding area. Implementation of the proposed Project, in combination with past, present, and potential future cumulative development in the area, could have the potential to unearth inadvertent tribal cultural resources in the surrounding area. Finds of tribal cultural resources tend to be site-specific. With regards to tribal cultural resources, the proposed Project would comply with Project Design Feature TCR-PDF-1, whereby a representative from the Gabrieleño Band of Mission Indians would conduct a 1-day on-site spot survey during the grading and earthwork phase to verify the presence or absence of any cultural resources. For this reason, the

proposed Project's incremental contribution to a cumulative impact would not be cumulatively considerable. Furthermore, each related project would be required to comply with procedures imposed by AB 52, which requires consultation with any California Native American tribe that requests consultation and cultural affiliated with the geographic areas on a project-by-project basis. Related projects in the immediate area, such as the Bow Tie Park Project to the south, would be subject to site-specific studies and AB 52 consultation similar to the environmental review under the proposed Project. Based on the timing and sequence of construction activities, any inadvertent discoveries on the Project Site or immediate vicinity would lead to more detailed investigations for nearby projects that are subject to land alterations. ***Thus, as the proposed Project would reduce potential impacts with implementation of TCR-PDF-1 described above, Project impacts to tribal cultural resources would not be cumulatively considerable. Cumulative impacts would be less than significant.***

### (2) Mitigation Measures

Cumulative impacts related to tribal cultural resources would be less than significant with compliance with regulatory requirements. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Cumulative impacts with regard to tribal cultural resources would be less than significant without mitigation.

# IV. Environmental Impact Analysis

# O. Energy

## 1. Introduction

The information presented herein is based, in part, on the Energy Demand Calculation Worksheets provided in Appendix Q of this Draft EIR. In addition, this section provides content and analysis required by Public Resources Code, Section 21100(b)(3) and described in Appendix F to the Guidelines for the Implementation of the California Environmental Quality Act (14 California Code of Regulations § 15000 et seq.). The following section analyzes the proposed Project's energy impacts on energy resources, focusing on the following three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). Specifically, this section quantifies the existing energy demands from the on-site land uses and the energy demands for the proposed development and identifies applicable energy conservation features that are either proposed by design or otherwise regulated by applicable building codes and regulations. The analysis presented below also addresses the proposed Project's potential impacts associated with short-term construction activities and long-term operational activities.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) Federal

##### *(a) Corporate Average Fuel Economy (CAFE) Standards*

Enacted by Congress in 1975, the Corporate Average Fuel Economy (CAFE) standard's purpose is to reduce energy consumption by increasing the fuel economy of cars and light trucks. The CAFE standards are fleet-wide averages that must be achieved by each automaker for its car and truck fleet, each year, since 1978. When these standards are raised, automakers respond by creating a more fuel-efficient fleet. CAFE standards are regulated by the U.S. Department of Transportation's (U.S. DOT) National Highway Traffic Safety Administration (NHTSA). The NHTSA sets standards to increase CAFE levels rapidly over the next several years, which will improve the nation's energy security and save consumers money at the gas pump, while also reducing greenhouse gas (GHG)

emissions. In 2012, NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallons (mpg). Currently, the USDOT and U.S. Environmental Protection Agency (U.S. EPA) propose the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which would amend existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establish new standards covering model years 2021 through 2023. NHTSA and U.S. EPA are currently seeking comment on this proposal.[1,2]

*(b) Energy Independence and Security Act*

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national greenhouse gas (GHG) emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the U.S. EPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[3]

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[1] *U.S. Department of Transportation, Corporate Average Fuel Economy (CAFE) Standards, website: https://www.transportation.gov/mission/sustainability/corporate-average-fuel-economy-cafe-standards, accessed November 2018.*

[2] *Corporate Average Fuel Economy, Laws and Regulations, CAFE, website: https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy, accessed November 2018.*

[3] *A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.*

## (2) State

### *(a) California Renewables Portfolio Standard*

The California Renewables Portfolio Standard (RPS) program, which was established in 2002 by Senate Bill (SB) 1078, required that 20 percent of the available energy supplies in California come from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20-percent mandate to 2010. These mandates apply directly to investor-owned utilities. On April 12, 2011, California Governor Jerry Brown signed into law Senate Bill 2X, which modified California's RPS program to require that both publicly- and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. In October 2015, Governor Brown signed into legislation Senate Bill 350, which requires retail sellers and publicly-owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by December 31, 2030. In 2018, SB 100 was signed into law, which again increases the RPS to 60 percent by 2030 and requires all of California's electricity to come from carbon-free resources by 2045. SB 100 became effective on January 1, 2019.[4]

### *(b) California Senate Bill 350*

The Clean Energy and Pollution Reduction Act of 2015, Senate Bill (SB) 350 (Chapter 547, Statutes of 2015) was approved by Governor Brown on October 7, 2015. The objectives of SB 350 are to (1) increase the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased from 33 percent to 50 percent by December 31, 2030; (2) require the State Energy Resources Conservation and Development Commission to establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030; (3) provide for the evolution of the California Independent System Operator (CAISO), a non-profit public corporation, into a regional organization; and (4) require the state to reimburse local agencies and school districts for certain costs mandated by the state through procedures established by statutory provisions. Among other objectives, the Legislature intends to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. In other words, SB 350 essentially requires the energy efficiency of existing buildings to be doubled by 2030.[5]

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[4] *California Public Utilities Commission, California Renewables Portfolio Standard, accessed July 2019.*

[5] *SB 350 (2015–2016 Reg. Session) Stats 2015, ch. 547.*

*(c) In-Use Off-Road Diesel Fueled Fleets Regulation*

Since off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. On July 26, 2007, CARB approved the "In-Use Off-Road Diesel Fueled Fleets Regulation" to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation became effective on June 15, 2008 and sets an anti-idling limit of five minutes for all off-road vehicles 25 horsepower and up. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October 2016, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines, and started enforcing beginning July 1, 2014. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year or has completed the Best Available Control Technology requirements (BACT). Large fleets have compliance deadlines each year from 2014 through 2023, medium fleets each year from 2017 through 2023, and small fleets each year from 2019 through 2028.

*(d) California Air Resources Board's Advanced Clean Cars Program*

The Advanced Clean Cars Program was approved by CARB in 2012. It represents a new approach by controlling emissions from passenger vehicles. CARB continues to propose a suite of regulations affecting new cars sold between 2017 and 2025. Components of this program are the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs, with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. The number of plug-in hybrid cars and zero-emission vehicles on California's roads and highways will increase and fuels, such as electricity and hydrogen, will be readily available for these new vehicle technologies.[6]

*(e) Senate Bill 1389*

Senate Bill 1389 (SB 1389) requires the California Energy Commission (CEC) to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The CEC shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect

[6] *CARB, The Advanced Clean Cars Program, accessed July 2019.*

public health and safety. The CEC adopts an Integrated Energy Policy Report (IEPR) every two years and an update every other year. The most recent IEPR was released in early 2018 and addressed a variety of issues, including, but not limited to, implementation of SB 350, electricity resource/supply plans, electricity and natural gas demand forecast, natural gas outlook, transportation energy demand forecasts, doubling energy efficiency savings, integrated resource planning, climate adaptation and resiliency, renewable gas, Southern California energy reliability, distributed energy resources, strategic transmission investment plan, and existing power plant reliability issues.[7]

*(f) Title 24 Energy Efficiency Standards*

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations) were established to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The Standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2016 Title 24 standards went into effect on January 1, 2017, and include efficiency improvements to the residential standards for attics, walls, water heating, and lighting. The efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers *(*ASHRAE) 90.1 2013 national standards.[8]

*(g) California Green Building Standards*

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. The latest CALGreen Code was updated in 2016 and became effective on January 1, 2017. The 2016 CALGreen Code includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality.[9] Most mandatory measure changes, when compared to the previously applicable 2013 CALGreen Code, were related to the definitions and to the clarification or addition of referenced manuals, handbooks, and standards. For example, several definitions related to energy that were added or revised affect electric vehicle (EV) chargers and charging and hot water recirculation systems.

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7 *California Energy Commission, Final 2017 Integrated Energy Policy Report, accessed November 2018.*

8 *California Energy Commission, 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, June 2015.*

9 *California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, January 2017.*

For new multi-family dwelling units, the residential mandatory measures were revised to provide additional EV charging requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification.[10] For nonresidential mandatory measures, the table (Table 5.106.5.3.3) identifying the number of required EV charging spaces has been revised in its entirety.[11]

*(h) Assembly Bill 32*

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, Assembly Bill (AB) 32 (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, commits the state to achieving year 2000 GHG emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32 tasked the CPUC and the CEC with providing information, analysis, and recommendations to the California Air Resources Board (CARB) regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors.

*(i) Assembly Bill 1493/Pavley Regulations*

AB 1493 (commonly referred to as CARB's Pavley regulations) was the first legislation to regulate GHG emissions from new passenger vehicles. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks) for model years 2009–2016.11 The Pavley regulations are expected to reduce GHG emissions from California's passenger vehicles by about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs.[12]

### (3) Local Regulations

*(a) City of Los Angeles Sustainable City pLAn*

On April 8, 2015, Mayor Eric Garcetti released the Los Angeles' first ever Sustainable City pLAn (The pLAn). In 2019, the Mayor's office adopted The Green New Deal Sustainable City pLAn 2019 (L.A.'s Green New Deal), as an update to the 2015 Sustainable City pLAn, which establishes accelerated goals for a cleaner environment and a stronger economy, with commitment to equity as its foundation. L.A.'s Green New Deal reported that in 2017 approximately 30% of the LADWP's total energy production

[10] *California Building Standards Commission, 2016 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, Chapter 4—Residential Mandatory Measures, effective January 1, 2017.*

[11] *California Building Standards Commission, 2016 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, Chapter 5—Nonresidential Mandatory Measures, effective January 1, 2017.*

[12] *CARB, Clean Car Standards—Pavley, Assembly Bill 1943, www.arb.ca.gov/cc/ccms/ccms.htm, accessed July, 2019.*

was from renewable energy sources.[13] L.A's Green New Deal sets the following targets for a sustainable city:

- Supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045;
- Source 70% of our water locally by 2035, and capture 150,000 acre ft/yr (AFY) of stormwater by 2035
- Reduce building energy use per square foot for all types of buildings 22% by 2025; 34% by 2035; and 44% by 2050;
- Reduce Vehicle Miles Traveled (VMT) per capita by at least 13% by 2025, 39% by 2035, and 45% by 2050
- Ensure 57% of new housing units are built within 1,500 feet of transit by 2025; and 75% by 2035
- Increase the percentage of zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050
- Create 300,000 green jobs by 2035; and 400,000 by 2050
- Convert all city fleet vehicles to zero emission where technically feasible by 2028
- Reduce municipal GHG emissions 55% by 2025 and 65% by 2035 from 2008 baseline levels, reaching carbon neutral by 2045.[14]

*(b) City of Los Angeles Green Building Code*

On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the "Los Angeles Green Building Code," by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CALGreen Code. Projects filed on or after January 1, 2017, must comply with the provisions of the Los Angeles Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

[13] *City of Los Angeles, L.A.'s Green New Deal, Sustainable City Plan, 2019.*
[14] *City of Los Angeles, L.A.'s Green New Deal, Sustainable City Plan, 2019.*

*(c) City of Los Angeles Solid Waste Integrated Resources Plan*

Under the City's Solid Waste Integrated Resources Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030.[15] Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation, and processing of commercial and multi-family solid waste that would aid the City in meeting its diversion goals by, among other things: (i) requiring franchises to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which would enable required reporting and monitoring of state-mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

As reported by the Bureau of Sanitation, the City's solid waste diversion rate for the 2013 fiscal year was 76.4 percent. The City is exceeding the state-mandated diversion goal of 50% by 2000 set by the California Integrated Waste Management Act (AB 939) of 1989. The City's Sustainable City pLAn (2nd Annual Report for 2016-2017) calls for achieving 90 percent diversion by 2025 and 95 percent diversion by 2035, and 100% by 2050. Through on-going development of waste management infrastructure and innovative source reduction, reuse, recycling and composting programs. These programs include Green Mulching and Composting workshops, black yard trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals.

*(d) 2017 Final Power Strategic Long-Term Resource Plan (SLTRP)*

Starting in 2017, the Power Integrated Resource Plan (IRP) was expanded into the Power Strategic Long-Term Resource Plan (SLTRP), which will increase the planning horizon, from 20 years ending in 2037 and extend through 2050, in order to better align with

[15] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Zero Waste Progress Report, March, 2013.*

Statewide GHG emissions goals and align with Los Angeles' 100 percent clean energy initiative. The LADWP's 2017 SLTRP document serves as a comprehensive 20-year roadmap that guides the LADWP power system in its efforts to supply reliable electricity in an environmental responsible and cost-effective manner. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and power system assets that meets the City's future energy needs at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The 2017 SLTRP re-examines and expands its analysis on the 2016 IRP resource cases with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent RPS, advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification.

As LADWP starts the process to investigate, study, and determine the investments needed for a 100-percent clean energy portfolio, the 2017 SLTRP provides a path towards this goal with a combination of GHG reduction strategies, including early coal replacement two years ahead of schedule by 2025; accelerating RPS to 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036; doubling of energy efficiency from 2017 through 2027; repowering coastal in-basin generating units with new, highly efficient potential clean energy projects by 2029 to provide grid reliability and critical ramping capability; accelerating electric transportation to absorb GHG emissions from the transportation sector; and investing in the Power System Reliability Program to maintain a robust and reliable power system.

This 2017 SLTRP utilizes LADWP's 2017 Load Forecast, dated September 15, 2017, of customer demand for electricity over the next 20 years. The retail sales forecast is divided into six separate customer classes: residential, commercial, industrial, electric vehicle sales, streetlight, and Owens Valley. The drivers in the retail sales models include normalized weather, population, employment, construction activity, and personal consumption and income. The retail sales forecasted from the class models are adjusted for LADWP programs that affect consumption behind the meter such as energy efficiency and rooftop solar generation, as well as known state regulations. The retail sales forecast represents sales that will be realized at the meter through the budget period, which extends through Fiscal Year End 2022. After the Fiscal Year End 2022, energy efficiency and distributed generation programs are not included in the forecast and will be treated as a resource in the SLTRP. For IRP modeling and analysis, adjustments are made to the approved load forecast to account for the alternative energy efficiency targets and customer net-metered solar projections. Energy efficiency savings and solar savings are expected to reduce the future short-term electricity demand. Based on the projections and strategies within the 2017 SLTRP, LADWP anticipates that it can meet the future demands of cumulative growth within its service area.

LADWP's recommended strategy set forth in the 2017 SLTRP for meeting its key objectives can be separated into two areas: (1) Regulatory and Reliability Initiatives, and (2) Strategic Initiatives. Regulatory and Reliability Initiatives are required actions to ensure system reliability and compliance with regulatory and legislative mandates. Strategic Initiatives are policy actions to achieve objectives established by the LADWP Board of Water and Power Commissioners and the Los Angeles City Council and reflect their vision and leadership. These policies include, for example, establishment of LADWP's energy efficiency, RPS, local solar, energy storage, demand response, and transportation electrification targets, social and economic development goals with consideration given to disadvantaged communities, early compliance with SB 1368,[16] and investing in infrastructure reliability.

## b) Existing Conditions

### (1) Electricity

#### *(a) Los Angeles Department of Water of Power (LADWP)*

The Los Angeles Department of Water and Power's (LADWP) power system serves approximately 4 million people and is the nation's largest municipal utility. Its service territory covers the City of Los Angeles and many areas of the Owens Valley, with annual sales exceeding 24 million megawatt-hours (MWh). LADWP is a "vertically integrated" utility, both owning and operating the majority of its generation, transmission, and distribution systems. LADWP strives to be self-sufficient in providing electricity to its customers and does so by maintaining generation resources that are equal to or greater than its customers' electrical needs.

LADWP has located a significant amount of generating resources within the Los Angeles area (west of the San Andreas fault zone), totaling 4,618-MW capacity out of a total of 7,323-MW capacity. By locating these generation sources within LADWP's service territory, LADWP ensures that it can produce electricity in the event of potential earthquakes or other situations that could interrupt LADWP's transmission system from importing power from external sources. Additionally, LADWP's new combined cycle and peaker plants, which normally operate on natural gas, also have a supply of backup fuel for use in emergency situations.

LADWP obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power. LADWP obtains

[16] *Senate Bill 1368 (Perata, Chapter 598, Statutes of 2006) limits long-term investments in baseload generation by the state's utilities to power plants that meet an emissions performance standard (EPS) jointly established by the California Energy Commission and the California Public Utilities Commission.*

power from four municipally-owned power plants within the Los Angeles Basin, LADWP Hydrogenerators on the Los Angeles Aqueduct, and shared-ownership generating facilities in the Southwest, and also purchases power from the Southwest and Pacific Northwest. LADWP also purchases excess power, as it is made available, from self-generators interconnected with the LADWP within the City.

*(b) Existing Electricity Consumption*

The LADWP currently provides electricity to the Project area with all required infrastructure present. There is an overhead 4.8-kilovolt (kV) line and an overhead 34.5-kV line along Casitas Avenue adjacent to the Project Site.[17] As shown in Table IV.O-1, Estimated Existing Electricity Demand, below, based on the existing land use on the Project Site the existing electricity demand is approximately 1,298,700 kilowatt-hours per year (kWh/year).

**Table IV.O-1**
**Estimated Existing Electricity Demand**

| Land Use | Size | | Total Electricity Demand (kWh/year)[a] |
|---|---|---|---|
| General Light Industry | 117,000 sf | | 1,298,700 |
| | | **Total Existing Electricity Demand:** | **1,298,700** |

*Notes: sf =square feet; kWh = kilowatt-hour*
[a] *California Emissions Estimator Model (CalEEMod)v.2016.3.2, Existing Conditions Annual Emissions Worksheets (See Appendix E, Greenhouse Gas Emissions Worksheets)*
*Source: Parker Environmental Consultants, 2018.*

## (2) Natural Gas

*(a) Southern California Gas Company (SoCalGas)*

The Southern California Gas Company (SoCalGas), a subsidiary of Sempra Energy (the nation's largest natural gas supplier), provides natural gas to the City of Los Angeles through existing gas mains located under the streets. Natural gas service is provided in accordance with the SoCalGas's policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual agreements are made. The availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SoCalGas is under the jurisdiction of the CPUC but can also be affected by actions of federal regulatory agencies. Should these agencies take any

[17] *City of Los Angeles Department of Water and Power, Water and Electric Connection Services Request, February 2, 2017 (see Appendix I, Public Service Letters).*

action that affects gas supply or the conditions under which service is available, gas service would be provided in accordance with those revised conditions.

Gas supply available to SoCalGas from California sources averaged 323 million cubic feet per day (cf/day) in 2017. SoCalGas projects total natural gas demand to decrease at an annual rate of 0.74 percent per year from 2018 to 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, tighter standards created by revised Title 24 codes and standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with the natural gas consumption becoming more efficient and decreasing, the SoCalGas's projection for natural gas also decreases. Interstate pipeline delivery capability into SoCalGas on any given day is theoretically approximately 6,665 million cf/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SoCalGas's estimated physical capacity of upstream pipelines. SoCalGas's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cf; of that, 112.5 billion cf is allocated to residential, small industrial, and commercial customers.[18]

*(b) Existing Natural Gas Demand*

The Project Site is currently developed with a light manufacturing facility and has access to existing gas mains connecting the property to a natural gas supply. As shown in Table IV.O-2, below, based on the existing land uses presently being occupied on the Project Site, the existing natural gas demand is estimated to be 2,117,700 kbtu per year (cf/year) or approximately 173,015 cf per month (cf/month).

**Table IV.O-2**
**Estimated Existing Natural Gas Demand**

| Land Use | Size | Natural Gas Demand Rate (kBtu/year) [a] | Total Natural Gas Demand (cubic feet/month)[b] |
|---|---|---|---|
| General Light Industry | 117,000 sf | 2,117,700 | 173,015 |
| **Total Existing Natural Gas Demand:** | | | **173,015** |

*Notes: sf =square feet.*
[a] *California Emissions Estimator Model (CalEEMod)v.2016.3.2, Existing Conditions Annual Emissions Worksheets (See Appendix E, Greenhouse Gas Emissions Worksheets)*
[b] *1 cubic feet (cf) of natural gas = 1.02 kBtu.*
*Source: Parker Environmental Consultants, 2017.*

[18] *California Gas and Electric Utilities, 2018 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/ 2018_California_Gas_Report.pdf, accessed November 2018.*

### (3) Transportation Energy

Different types of energy sources, or fuels, are used for transportation in the U.S., which include petroleum products (e.g., gasoline, diesel, jet fuel, residual fuel oil, and propane), biofuels (e.g., ethanol and biodiesel), natural gas, and electricity. Petroleum-based fuels account for about 90 percent of California's transportation energy sources. Gasoline remains the dominant fuel within the transportation sector, with diesel fuel and aviation fuels following. The transportation sector generates the most GHG emissions and uses the most energy in California. In recognition of these challenges, California has been enacting policies and goals to shift the transportation sectors toward cleaner, sustainable fuels and more efficient technology vehicles.

Though California's population and economy are expected to grow, gasoline demand is projected to decline from roughly 15.6 billion gallons in 2017 to between 12.1 billion and 12.6 billion gallons in 2030, a 19 percent to 22 percent reduction. This decline comes in response to both increasing vehicle electrification and higher fuel economy for new gasoline vehicles. The CEC projects that the amount of alternative fuel (e.g., electricity, natural gas, hydrogen, ethanol) consumed within the transportation sector will increase in the future.[19,20]

Currently, the on-site light manufacturing facility and uses generate a demand for transportation energy as a result of the vehicle trips traveling to and from the Project Site. As shown in Table IV.K-9 in Section IV. K, Traffic/Transportation, the estimated daily trips associated with the existing Project Site is 440 trips. Based on this estimate, and the VMT estimate as reported in the California Emissions Estimator Model (*CalEEMod*, *version 2016.3.2*) program (see Appendix E, GHG Emissions Worksheets), the existing land uses are estimated to generate an annual demand of 63,601 gallons of gas and 12,947 gallons of diesel per day as summarized in Table IV.O-3, Estimated Existing Transportation Energy Consumption, below.

[19] *California Energy Commission, Final 2017 Integrated Energy Policy Report, April 2018.*
[20] *California Energy Commission, Revised Transportation Energy Demand Forecast, 2018-2030, April 2018.*

**Table IV.O-3**
**Estimated Existing Transportation Energy Consumption**

| Fuel Type | Estimated Annual VMT [a] | Average Mileage [b] | Total Demand (gallons/year) |
|---|---|---|---|
| Gasoline | 1,355,973 | 21.32 | 63,601 |
| Diesel | 104,226 | 8.05 | 12,947 |
| Electric | 11,330 | -- | -- |

*Notes: MT/year = metric tons per year.*

[a] *Total existing annual VMT is based on the CalEEMod worksheets presented in Appendix E, Greenhouse Gas Emissions Worksheets. The VMT by fuel type was assumed to be proportionate to the 2018 fleet mix per the EMFAC 2014 program for the year 2018 as shown in Appendix Q, Energy Demand Calculation Worksheets.*

[b] *Average mileage was based on EMFAC 2014 data for the South Coast Region in 2018 (see Appendix Q, Energy Demand Calculation Worksheets).*

*Source: Parker Environmental Consultants, 2019.*

# 3. Environmental Impacts

## a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact on energy if it would:

***Threshold (a)*** ***Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation;***

***Threshold (b)*** ***Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.***

In accordance with Appendix F (Energy Conservation) of the State CEQA Guidelines and the LA CEQA Thresholds Guide, the following criteria may be considered in determining if the threshold of significance is met:

***Criteria 1)*** ***The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.***

***Criteria 2)*** ***The effects of the project on local and regional energy supplies and on requirements for additional capacity.***

***Criteria 3) The effects of the project on peak and base period demands for electricity and other forms of energy.***

***Criteria 4) The degree to which the project complies with existing energy standards.***

***Criteria 5) The effects of the project on energy resources.***

***Criteria 6) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.***

***Criteria 7) The extent to which the Project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities.***

***Criteria 8) Whether the Project conflicts with adopted energy conservation plans.***

***Criteria 9) The degree to which the Project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.***

## b) Methodology

### (1) Construction

Construction of the Proposed Project would generate an increase in demand for electricity related to the treatment and conveyance of water used for dust suppression activities during the excavation and grading phase. Quantifying the amount of electricity for lighting and electronic equipment use on site during the construction period was assumed to be negligible since most of the construction equipment would be gasoline and diesel-powered and any electrical demands would be less than the demand generated by the existing site operations. For purposes of this analysis, electricity use was quantified for a temporary construction trailer that would support construction management operations. The estimated electric demand for this temporary office use was conservatively based on a 1,000 square foot general office land use. No natural gas consumption would occur during the construction period as no construction equipment using natural gas as a fuel source would be used.

Because most of the construction equipment would be gasoline and diesel-powered, a quantitative assessment of the diesel and gas fuel use during construction is provided. To quantify the amount of transportation energy consumed during construction, the equipment usage, horsepower, load factors, and fuel rates from the construction phases and activities were calculated using the equipment usage, intensity factors, and fuel

usage rates in the CalEEMod program and the SCAQMD's CEQA Air Quality Handbook (1993). Fuel efficiency rates for construction worker/vendor trips and haul trucks were calculated based on CARB's 2014 Emissions Factors model program (2014 EMFAC) for the anticipated year of construction activity. The calculation worksheets are provided in Appendix Q, Energy Demand Calculation Worksheets, to this Draft EIR.

#### (2) Operation

The amount of electricity and natural gas usage for the proposed Project were estimated using the electricity generation rates and natural gas usage rates provided in the CalEEMod program. The proposed Project's estimated electricity and natural gas demands were analyzed relative to LADWP's and SoCalGas's existing and planned energy supplies to determine if these two energy utility companies would be able to meet the proposed Project's electricity and natural gas demands. Additionally, the impact to local infrastructure to accommodate the proposed Project's estimated electricity and natural gas demand was assessed.

The amount of gasoline consumed during each operation year of the proposed Project, was based on the total annual VMTs as reported in the CalEEMod program and gasoline and diesel fuel efficiency rates for the project buildout year (2023) based on EMFAC 2014 (v1.0.7) data. (See Appendix Q, Energy Demand Calculation Worksheets, to this Draft EIR). These calculations were used to determine if the proposed Project causes the wasteful, inefficient and/or unnecessary consumption of energy as required by Appendix F of the State CEQA Guidelines.

## c) Project Design Features

The Project Design Features discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, are proposed to ensure the urban farm would be powered by 100-percent renewable solar energy and that natural gas-fueled fireplaces would be prohibited in the residential units. (See GHG-PDF-1 and GHG-PDF-2 in Section IV.D, Greenhouse Gas Emissions.)

## d) Analysis of Project Impacts

***Threshold (a) Would the Project cause a wasteful, inefficient, and unnecessary consumption of energy?***

#### (1) Impact Analysis

***Criteria 1) The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project's life cycle including***

***construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.***

*(a) Construction*

During Project construction, electricity would be consumed, on a limited basis, to power lighting of the Project Site and the temporary operation of an approximate 1,000 square foot construction trailer. Electricity would also be used indirectly for the treatment and conveyance of water used during construction for fugitive dust control. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. The total estimated electricity use from construction activities is 25,915 kilowatt-hours (kWh) as shown in Table IV.O-4, below.

**Table IV.O-4**
**Estimated Proposed Project Construction Energy Consumption**

| Fuel Type | Total Energy Demand [a] |
|---|---|
| **Electricity** | |
| Water Use (fugitive dust suppression) | 12,925 kWhr |
| Temporary Office Trailer | 12,990 kWhr |
| **Total Electricity** | **25,915 kWhr** |
| **Diesel** | |
| On-Site Construction Equipment | 63,009 gallons |
| Construction Worker/Vendor Trips | 5,993 gallons |
| C&D and Soil Export Haul Trips | 14,795 gallons |
| **Total Diesel** | **83,797 gallons** |
| **Gasoline** | |
| Construction Worker/Vendor Trips | 130,717 gallons |
| **Total Gasoline** | **130,717 gallons** |

*Source: Parker Environmental Consultants, 2018; Calculations provided in Appendix Q, Energy Demand Calculation Worksheets, to this Draft EIR.*

The estimated construction electricity usage represents approximately 2 percent of the estimated net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Moreover, construction electricity usage would replace the existing electricity usage at the Project Site during construction. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas

would not be supplied to support Project construction activities; thus there would be no demand generated by construction.

Transportation energy would be consumed during the demolition, excavation, and construction phases of the proposed Project. Project construction activities would consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As summarized in Table IV-O-4, above, construction of the proposed Project would consume approximately 214,514 total gallons of transportation fuel, including approximately 83,797 gallons of diesel and 130,717 gallons of gasoline.

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure.

Trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. In addition, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to Federal fuel efficiency requirements. Therefore, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not cause wasteful, inefficient, and unnecessary use of energy.

Construction Materials

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during the construction of the proposed Project or used during the operational life of the proposed Project, or the end of life for the materials and processes that would occur as an indirect result of the proposed Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to proposed Project construction and operation is expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to

construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

*(b) Operation*

*(i) Electricity Use*

Development of the proposed Project would increase the existing demand for electricity service in the Project Area. The proposed Project would be able to connect to and be served by the existing power grid. As shown in Table IV.O-5, below, the estimated net increase in electricity consumption by the proposed Project would be approximately 1,337,720 kWh/year.

With a modern building design, and pre-installed energy-efficient fixtures and appliances, the proposed Project would promote energy conservation in accordance with the policies identified in Title 24 and in the Los Angeles Green Building Code. While impacts upon regional energy resources are expected to be less than significant, implementation of regulatory compliance measures that meet Title 24 and the L.A. Green Building Code energy efficiency requirements would further reduce demand for electricity. Additionally, the proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate-controlled urban greenhouse (See GHG-PDF-1 in Section IV.D, Greenhouse Gas Emissions). As such, no electricity would be consumed by the urban farm use.

LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 30 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available. This represents the available off-site renewable sources of energy that would meet the proposed Project's energy demand. The use of renewable energy would indirectly reduce use of fossil fuels required for electricity generation (natural gas, coal, oil). While the electricity usage rate for a given land use would not be directly affected by the availability of renewable energy, the consumption of fossil fuels required for electricity generation would be reduced.

In addition, the proposed Project would comply with Section 110.10 of Title 24, which includes mandatory requirements for solar-ready buildings, and, as such, would not preclude the potential use of alternate fuels.

**Table IV.O-5**
**Estimated Electricity Demand by Proposed Project**

| Land Use | Size | Total Electricity Demand (kWh/year)[a] |
|---|---|---|
| | | |
| General Light Industrial | 117,000 sf | 1,298,700 |
| **Existing Electricity Demand:** | | **1,298,700** |
| **Proposed Uses** | | |
| Multi-Family Residential | 419 du | 1,698,470 |
| Office | 19,000 sf | 246,810 |
| Restaurant | 3,000 sf | 132,420 |
| Urban Farming | 42,000 sf | 0 [b] |
| Parking Structure | 720 spaces | 558,720 |
| **Total Proposed Project Electricity Demand:** | | **2,636,420** |
| *Less Existing Electricity Demand:* | | *-1,298,700* |
| **NET TOTAL Electricity Demand:** | | **1,337,720** |

*Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour*
[a] *California Emissions Estimator Model (CalEEMod)v.2016.3.2, Existing Conditions Annual Emissions Worksheets See Appendix E, Greenhouse Gas Emissions Worksheets)*
[b] *The proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate-controlled urban greenhouse.*
*Source: Parker Environmental Consultants, 2018.*

### *(ii) Natural Gas Use*

The proposed Project would increase demand for natural gas service on the Project Site. As shown in Table IV.O-6, below, the proposed Project's net natural gas demands are estimated to be approximately 3,372,230 kbtu/year, or approximately 275,509 cf/month. The proposed Project would promote energy conservation in accordance with the policies identified in Title 24 and the L.A. Green Building Code, which sets compliance measures to promote energy conservation efforts. Additionally, as discussed above, the proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate- controlled urban greenhouse. The use of natural gas-fueled fireplaces within the residential units would also be prohibited. (See GHG-PDF-1 and GHG-PDF-2 in Section IV.D, Greenhouse Gas Emissions). As such, the proposed Project would not consume or demand an excessive amount of natural gas.

**Table IV.O-6**
**Proposed Project's Estimated Net Natural Gas Demand**

| Land Use | Size | Natural Gas Demand Rate (kBtu/year) [a] | Total Natural Gas Demand (cf/month) [c] |
|---|---|---|---|
| **Proposed Project** | | | |
| Multi-Family Residential | 419 du | 4,599,860 | 375,806 |
| Office | 19,000 sf | 197,790 | 16,159 |
| Restaurant | 3,000 sf | 692,280 | 56,559 |
| Urban Farm | 42,000 sf | 0 | 0 |
| **Total Proposed Project Natural Gas Demand:** | | **5,489,930** | **448,524** |
| *Less Existing Natural Gas Demand [b]:* | | -2,117,700 | *-173,015* |
| **NET TOTAL Natural Gas Demand:** | | **3,372,230** | **275,509** |

*Notes: sf =square feet; du = dwelling unit*
[a] *California Emissions Estimator Model (CalEEMod) v.2016.3.2, Proposed Project Annual Emissions Worksheets See Appendix E, Greenhouse Gas Emissions Worksheets)*
[b] *See Table IV.O-3, Estimated Existing Natural Gas Demand.*
[c] *1 cubic feet (cf) of natural gas = 1.02 kBtu.*
*Source: Parker Environmental Consultants, 2019.*

### *(iii) Transportation Energy Consumption*

The proposed Project would generate a demand for fossil fuels as a result of the vehicle trips traveling to and from the Project Site. As shown in Table IV.K-9, Project Trip Generation Estimates – Daily Trips, in Section IV.K, Traffic/Transportation, the estimated daily trips associated with the proposed Project would be approximately 2,551 net trips. As identified in Table IV.K-9, a 15 percent transit trip reduction was applied for the apartments. An additional 5 percent transit trip reduction and 5 percent internal trip reduction was applied for the creative office space. An 80 percent internal trip reduction was applied for the restaurant space. These trip reductions for the proposed Project would reduce the number of proposed vehicle trips. The reduction in vehicle trips due to the proposed Project's mixed uses and location would, therefore, reduce the proposed Project's reliance on fossil fuels. The proposed Project's fuel use was estimated based on the proposed Project's trip generation and annual VMTs as calculated in the CalEEMod program. As shown in Table IV.O-7, Proposed Project's Estimated Transportation Energy Consumption, the proposed Project would result in a net demand for 283,101 gallons of gasoline and 75,211 gallons of diesel fuel on an annual basis during the life of the proposed Project for transportation related fuels.

**Table IV.O-7**
**Proposed Project's Estimated Transportation Energy Consumption**

| Fuel Type | Existing Fuel Use (gallons/year)[a] | Proposed Fuel Use (gallons/year) [b] | Net Project Fuel Use (gallons/year) |
|---|---|---|---|
| Gasoline | 63,601 | 346,702 | 283,101 |
| Diesel | 12,947 | 88,158 | 75,211 |

*Notes:*
[a] *See Table IV-O-3, Estimated Existing Transportation Energy Consumption.*
[b] *See Appendix Q, Energy Demand Calculation Worksheets.*
*Source: Parker Environmental Consultants, 2019.*

***Criteria 2) The effects of the Project on local and regional energy supplies and on requirements for additional capacity.***

*(a) Electricity*

Correspondence with LADWP (dated February 2, 2017 and contained in Appendix I) states that electric service is available to serve the proposed Project and would be provided in accordance with LADWP's Rules Governing Water and Electric Service. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirement for the proposed Project would be part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. The LADWP's load growth forecast incorporates construction activity and is built into the commercial floor space model. In planning sufficient future resources, the LADWP's Power Strategic Long-Term Resource Plan incorporates the estimated power requirement for the proposed Project through the load forecast input and has planned sufficient resources to supply the electricity needs. Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2022-2023 fiscal year (the proposed Project's buildout year) would be 22,613 GWh of electricity. The proposed Project's estimated electricity use during construction would be 32,915 kWh per year, which 2.5 percent of the current energy demand generated by the existing light industrial warehouse/production land uses. Thus, energy demand during construction would be well within the local and regional energy supplies. With respect to operation, the proposed Project's estimated net increase in annual electricity usage of 1,337,720 kWh would be a small fraction of one percent of LADWP's projected sales for 2023. As future projected electricity supplies from LADWP are adequate to serve the proposed Project, the proposed Project impacts on local and regional electricity supplies during construction and operation would be less than significant.

*(b) Natural Gas*

As stated above, SoCalGas has a combined theoretical storage working inventory capacity of 112.5 billion cf allocated to residential, small industrial, and commercial customers.[21] Since the proposed Project is located in an area already served by existing natural gas infrastructure, the proposed Project would not require extensive infrastructure improvement to serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the proposed Project. The proposed Project would, however, require local infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts associated with utility upgrades or additional connections would be temporary in nature.

As estimated above, the proposed Project's net natural gas demands are estimated to be approximately 275,509 cf/month, or approximately 3,372,230 kBtu/year. The natural gas consumption of 3.3 million cubic feet per year would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity and, therefore, would be well within the SoCalGas's existing natural gas storage capacity of 112.5 billion cubic feet as of 2018. Therefore, the proposed Project's impacts on local and regional natural gas supplies during both construction and operation would be less than significant.

*(c) Transportation Energy*

In 2017, approximately 624,984 thousand barrels of crude oil (approximately 26.2 billion gallons) were supplied to California refineries.[22] Assuming the same supply of crude oil is provided to California in 2022 (buildout year of proposed Project), the proposed Project's estimated consumption of 283,101 gallons of gasoline per year and 75,211 gallons of diesel fuel per year would be a small fraction of one percent of available oil. This estimate is conservative since it is assumed that California's reliance on oil would be reduced since vehicles are transitioning to alternative fuels, such as electric-fueled vehicles. As such, the gasoline consumption associated with the proposed Project's vehicle trips during both construction and operation would be a negligible amount of oil compared to the total amount of oil supplied to California, and impacts on regional and local supplies would be less than significant.

[21] *California Gas and Electric Utilities, 2018 California Gas Report, accessed November 2018.*
[22] *California Energy Commission, Oil Supply Sources to California Refineries, , accessed July 2019.*

***Criteria 3) The effects of the Project on peak and base period demands for electricity and other forms of energy.***

As discussed above, the electricity demand, natural gas consumption, and transportation energy consumption would be well within the available regional supplies of LADWP, SoCalGas, and California refineries, respectively. The proposed Project's energy demand and consumption are negligible compared to available supplies during both construction and operation. The electricity, natural gas, and transportation energy supplies would be sufficient to serve the proposed Project's peak energy consumptions, and impacts would be less than significant.

***Criteria 4) The degree to which the Project complies with existing energy standards.***

*(a) Construction*

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment. During construction, trucks and equipment operated on-site would comply with SCAQMD's anti-idling regulations and CARB's In-Use Off-Road Diesel-Fueled Fleets regulation. Compliance with the anti-idling and diesel-fueled fleet regulations would directly reduce the amount of diesel fuel consumed during the construction phase. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards, as required. Therefore, the proposed Project's construction activities would comply with existing energy standards, and impacts would be less than significant.

*(b) Operation*

The proposed Project would be required to comply with 2016 Title 24 requirements, 2016 CalGreen requirements, and the L.A. Green Building Code. Therefore, the proposed Project would comply with energy standards with respect to electricity and natural gas usage. With respect to transportation energy, the vehicles traveling to and from the Project Site are assumed to comply with CAFE standards and CARB's Advanced Clean Cars Program. Therefore, the proposed Project would comply with all existing construction and operational energy standards that are applicable to the proposed Project, and impacts would be less than significant.

***Criteria 5) The effects of the Project on energy resources.***

*(a) Electricity*

LADWP's electricity generation is supplied from a variety of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal, wind, and hydropower. Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2022-2023 fiscal year (the proposed Project's buildout year) would be 22,613 GWh of electricity. As such, the proposed Project's estimated net annual usage demand of 1,337,720 kWh would be a small fraction of one percent of LADWP's projected sales for 2023.

In accordance with SB 350, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. According to the 2017 Power SLTRP, LADWP has increased renewable energy percentage from 3 percent to 29 percent from 2003 to 2016. LADWP's future strategy is pursuing higher renewables, energy efficiency, and future electrification of existing fossil fuel processes. It is expected that solar and wind will provide most of the new renewable electric generation in the years ahead. The proposed Project would adhere to the required building code standards, such as 2016 Title 24 standards and L.A. Green Building Code, to ensure energy efficiency within the proposed structures. Compliance with energy standards are expected to result in more efficient use of electricity in future years. As such, the proposed Project would not impact electricity resources during either construction and operation, and impacts would be less than significant.

*(b) Natural Gas*

Sources of Southern California's natural gas are primarily obtained from western United States and Canada with a small portion from in-state. As stated in the 2018 California Gas Report, SoCalGas's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cf; of that, 112.5 billion cf is allocated to residential, small industrial, and commercial customers. The proposed Project's net natural gas demands are estimated to be approximately 275,509 cf/month, or approximately 3.3 million cf/year. The natural gas consumption of 3.3 million cf/year would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity and, therefore, would be well within the SoCalGas's existing natural gas storage capacity of 112.5 billion cf as of 2018. Compliance with energy standards are expected to result in more efficient use of natural gas in future years. Therefore, the proposed Project would not impact natural gas resources, and impacts would be less than significant.

*(c) Transportation Resources*

As mentioned previously, approximately 624,984 thousand barrels of crude oil (approximately 26.2 billion gallons) were supplied to California refineries in 2017.[23] Assuming the same supply of crude oil is provided to California, the proposed Project's estimated consumption of 283,101 gallons of gasoline and 75,211 gallons of diesel fuel per year would be a small fraction of one percent of available fuel reserves. This estimate is conservative since it is assumed that California's future reliance on oil would be reduced since vehicles are transitioning to alternative fuels, such as electric-fueled vehicles. Additionally, Project-related vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would reduce transportation fuel consumption. As such, the proposed Project's transportation energy consumption during construction and operation would have a negligible impact to California's oil supplies, and impacts on energy resources would be less than significant.

***Criteria 6) The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.***

As discussed in Section IV.K, Traffic/Transportation, the proposed Project would promote trip reductions and alternative modes of transportation. The proposed Project's mix of residential, office, and commercial space, proximity to transit, and location near a broad mix of existing land uses results in a net reduction of approximately 465 daily trip ends as a result of internal trip capture and transit adjustments. The Project's Traffic Study incorporates a 15 percent transit trip reduction was applied for the apartments. An additional 5 percent internal trip reduction was applied for the creative office space, and an 80 percent internal trip reduction for the restaurant space. An additional 440 vehicle trips would be offset by the elimination of the manufacturing, warehousing, and production space currently on-site. With these credit adjustments, the proposed Project would result in a net increase of 2,551 daily trips, as compared to 3,455 trips that would result from a project without these trip reduction characteristics. With a 26 percent reduction in baseline vehicle trips, this would result in a reduction in transportation energy. Additionally, the proposed Project would provide 469 bicycle parking spaces to encourage residents, patrons, and employees to utilize alternate modes of transportation, such as walking, biking, and public transportation. As such, the proposed Project would promote alternate modes of transportation and reduce its reliance on transportation energy.

[23] *California Energy Commission, Oil Supply Sources to California Refineries,, accessed July 2019.*

***Criteria 7) The extent to which the Project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities.***

*(a) Electricity*

The projected increase in electrical demand due to the proposed Project would not have an adverse impact on its electrical system. Depending on the exact location and size of the requested services (to be determined as site plans are finalized), the Project Applicant may be financially responsible for some infrastructure improvements necessary to serve the proposed Project (e.g. installation of electric power facilities or service connections or adding a line extension on the public street).

Correspondence with LADWP also states that there is an overhead 4.8-kV line and an overhead 34.5-kV line along Casitas Avenue adjacent to the Project Site. The proposed Project may require power line extensions to the Project Site and house electricity infrastructure (e.g. pads) on site, which would be typical of such construction projects and would follow all mandatory regulations in coordination with LADWP. New service connections may occasionally result in temporary disruptions in electrical services for existing customers. However, no outages or short outage is anticipated to occur when hooking up the proposed Project. The installation of new infrastructure would not be expected to result in any significant secondary environmental effects. Therefore, the proposed Project's impacts to existing facilities would be less than significant.

*(b) Natural Gas*

The Southern California Gas Company manages the pipelines adjacent to the Project Site. Since the proposed Project is located in an area already served by existing natural gas infrastructure, the proposed Project would not require extensive infrastructure improvement to serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the proposed Project. The proposed Project would however, require local infrastructure improvements to connect to the existing infrastructure serving the Project area. "Hooking-up" disruptions cannot be determined until the actual natural gas demand is known. However, impacts associated with utility upgrades or additional connections would be temporary in nature and would not require new supply facilities. The operation of the proposed Project would not result in the increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities. Therefore, the proposed Project would result in a less than significant impact to natural gas infrastructure capacity.

***Criteria 8) Whether the Project conflicts with adopted energy conservation plans.***

The proposed Project would be required to comply with the 2016 CALGreen Code, 2016 Title 24 standards, and the L.A. Green Building Code standards. Compliance with state and local energy efficiency standards would ensure the proposed Project meets all applicable energy conservation policies and regulations. As such, the Proposed Project would not conflict with any adopted energy conservation plans, and impacts would be less than significant.

***Criteria 9) The degree to which the Project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.***

As stated above, the proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations, which includes energy conservation in electricity usage and natural gas usage. The proposed Project would also be required to comply with the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous energy conservation measures, beyond those required by Title 24 of the California Code of Regulations. Additionally, the proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate-controlled urban greenhouse (See GHG-PDF-1 in Section IV.D, Greenhouse Gas Emissions). Therefore, compliance with the L.A. Green Building Code and incorporation of a 100 percent solar-powered urban farm would reduce the proposed Project's energy consumption beyond City requirements, and impacts would be less than significant.

### (2) Conclusion to Threshold Question a)

***As demonstrated in the analysis of the eight criteria discussed above, the proposed Project's demands on electricity, natural gas, and transportation energy would not significantly affect local and regional supplies and infrastructure. Additionally, the Proposed Project would comply with all energy conservation standards applicable to the proposed Project. Therefore, the proposed Project would not cause wasteful, inefficient, and unnecessary consumption of energy during construction or operation, and impacts with respect to energy consumption would be less than significant.***

### (3) Mitigation Measures

Project impacts related to energy efficiency would be less than significant. Therefore, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Project impacts related to energy efficiency would be less than significant without mitigation.

***Threshold (b): Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

### (1) Impact Analysis

As discussed in Section 2(a), above, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2016 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. As discussed in greater detail in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the Project would also be consistent with the LA Green Plan/Climate LA and SCAG's 2016 RTP/SCS. The Project's mixed-use development on an infill lot would serve to reduce VMT and associated transportation fuel usage within the region. Furthermore, as discussed in Section IV.D, Greenhouse Gas Emissions, the proposed Project's urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy powered, climate controlled urban greenhouse (see GHG-PDF-1, in Section IV.D, Greenhouse Gas Emissions). The use of natural gas-fueled fireplaces would also be prohibited within the residential units (see GHG-PDF-2, in Section IV.D, Greenhouse Gas Emissions).

In order to meet reduction goals in the LA Green Plan/ClimateLA, LADWP will continue to implement programs to emphasize water conservation and will pursue securing alternative supplies, including recycled water and storm water capture. With regard to solid waste, the City implemented the RENEW LA plan to meet solid waste reduction goals by expanding recycling to multi-family dwellings, commercial establishments, and restaurants. The Project would be indirectly affected by these actions and would further reduce water and solid waste generation, thereby meeting the goals of the LA Green Plan/ClimateLA. With respect to the Sustainable City Plan, as also discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, although the pLAn is not directly applicable to private development projects, the Project would generally be consistent with the City's targets to reduce GHG emissions by 45% below 1990 levels by 2025 as it is an infill development consisting of a mixed-use project with synergies between land uses that would serve to reduce VMTs. Furthermore, the Project would comply with the LA Green Building Code, which requires a 20 percent reduction in water use and a requirement to exceed Title 24 energy efficiency standards.

### (2) Conclusion to Threshold Question b)

During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations. Based on the above, the Project would not conflict with adopted energy conservation plans, or violate state or federal energy standards. ***Therefore, Project impacts associated with regulatory consistency under Threshold (b) would be less than significant.***

### (3) Mitigation Measures

Project impacts related to energy efficiency would be less than significant. Therefore, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Project impacts related to energy efficiency would be less than significant without mitigation.

## e) Cumulative Impacts

### (1) Wasteful, Inefficient, and Unnecessary Use of Energy

Development of the proposed Project in conjunction with the 11 related projects within the LADWP's service area would further increase demand for electricity service provided by LADWP. As discussed above, the geographic context for the cumulative impact analysis on electricity is the service area of LADWP, and the geographic context for the cumulative impact analysis for natural gas resources is SoCalGas's service area. While the geographic context for transportation-related energy use is more difficult to define, it is meaningful to consider the Project in the context of region-wide consumption. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities. With respect to assessing cumulative impacts associated with the wasteful, inefficient, and unnecessary use of energy, the following provides an analysis of relevant policies and regulations that are applicable to new development projects within the geographies specified above.

#### *(a) Electricity*

As discussed above, the LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections

and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands, as shown in Table IV.O-8, above. Therefore, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Compliance with Title 24 energy conservation standards, City of Los Angeles Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Additionally, as discussed above, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 30 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available. This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. ***As such, the Project's contribution to cumulative impacts related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, cumulative impacts to electricity service would be less than significant.***

*(b) Natural Gas*

Southern California Gas Company (SoCalGas) provides natural gas services for the proposed Project and all 17 related projects identified in Section III, Environmental Setting. Although the proposed Project would result in the net increase of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, and would be reduced by energy efficiency measures implemented as part of Title 24 compliance and compliance with the LA Green Building Code. Such measures would serve to reduce demands upon natural gas and would be consistent with regional and local growth expectations for SoCalGas's service area.

Development of the proposed Project in conjunction with the 17 related projects identified in Section III, Environmental Setting, would further increase regional demands for natural gas resources. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Additionally, compliance with energy conservation

standards pursuant to Title 24 would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each related project. As such, it is anticipated the related projects and the proposed Project would be accommodated by SoCalGas. ***Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.***

*(c) Transportation Energy*

The proposed Project in conjunction with the 17 related projects identified in Section III, Environmental Setting, would cumulatively increase the demand for transportation energy. As discussed previously, the NHTSA and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. ***As such, the proposed Project and future related projects would be expected to cumulatively reduce consumption in transportation energy, and therefore be less than significant.***

### (2) Mitigation Measures

Cumulative impacts related to energy would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Cumulative impacts related to energy would be less than significant without mitigation.

# V. Project Alternatives

## A. Introduction

Public Resources Code (P.R.C.) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed Projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. P.R.C. Section 21002.1(a) further states, that "[t]he purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR "shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." CEQA Guidelines Section 15126.6(f)(1) states that:

> "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries […], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site […]"

As set forth in Section II, Project Description, the objectives of the Project are as follows:

- Meet the Community Plan's objective to minimize incompatibilities between residential uses and commercial or industrial use.
    - Achieve greater land use compatibility by replacing existing light industrial uses with uses more compatible with nearby existing and

proposed recreational, residential, and school uses, as well as the Los Angeles River.

  - Resolve the current inconsistency between the Project Site's [Q]PF-1-CDO-RIO zoning and its Heavy Manufacturing land use designation under the Community Plan.

- Promote the development of the RIO District by enhancing the visual appearance of and character of the Project Site with well-designed buildings and landscaping.

- Promote and support pedestrian activity along the Los Angeles River and enhance pedestrian access between the Los Angeles River and Casitas Avenue.

- Address the City's critical housing needs by providing a significant amount of housing, including Very Low Income housing units, in a range of housing types and sizes at a location that does not displace existing housing.

- Reduce vehicle trips and vehicle miles travelled.

  - Develop additional housing stock at an infill location that is close to commercial and recreational amenities, employment opportunities, and schools.

  - Provide a mixed-use project with on-site amenities.

  - Provide restaurant and similar amenities within walking distance of the residential neighborhoods on the other side of SR-2, future park users, and the Los Angeles River.

- Promote fiscal benefits to the City, including economic development, job creation, and increased sales taxes.

  - Support the existing commercial uses along Fletcher Drive and San Fernando Road with development that will bring new customers.

- Support a growing demand for ecologically sensitive urban farming operations through the provision of an urban farm.

# 1. Analytical Assumptions and Methodology

The level of detail required in the alternatives analysis does not need to be as detailed as required for the environmental analysis of the proposed Project. Rather, an EIR should include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project." As such, the alternatives analysis is presented as a comparative qualitative and quantitative analysis to the proposed Project, and unless specifically indicated otherwise, assumes that all mitigation measures proposed for the proposed Project would apply to each alternative. Impacts associated with each alternative are evaluated in comparison to the proposed Project's impacts and are classified as increased, reduced, or essentially equivalent to the level of impact associated with the proposed Project.

# 2. Alternatives Considered But Rejected

CEQA Guidelines Section 15126.6(b) states that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." Thus, the consideration of feasible alternatives was focused on lessening or avoiding the Project's significant and unavoidable operational traffic and operational mobile noise impacts.

In accordance with CEQA Guidelines Section 15126.6(c), an analysis of an alternative project site was rejected from further consideration. An alternative site is not considered feasible as it is not expected that the Applicant can reasonably acquire, control or have access to a suitable alternative site that would provide for the uses and square footage proposed by the proposed Project. The few sites in the Project area of sufficient size to accommodate the proposed Project have been previously developed or are planned for parkland. Moreover, an alternative site would not meet the basic project objective to achieve greater land use compatibility between uses on the Project Site and nearby existing and proposed recreational, residential, and school uses, as well as the Los Angeles River. In addition, other locations in the Project area are not considered suitable for Project development because the proposed mid-rise buildings would be incompatible with surrounding development. Furthermore, development of the proposed Project at an alternative site would be unlikely to avoid the proposed Project's traffic impacts, as vehicle trips to and from the alternative location would likely travel on the same roadways.

## a) Selection of Alternatives

The objective of the project alternatives analysis, as directed by CEQA, is to identify alternatives that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. Based on this directive, the Project Alternatives evaluated within the scope of this EIR are as follows:

1) No Project Alternative

2) Reduced Density Alternative (1.5 FAR)

3) Commercial Office Alternative

4) Residential Alternative

5) Mixed-Use Podium Alternative

A detailed description and environmental analysis for each of these alternatives is provided within Sections V.B through V.F below. The identification of the alternative that would be most capable of reducing the proposed Project's adverse environmental impacts is presented in Section V.G, Environmentally Superior Alternative.

While the No Project Alternative was selected as the environmentally superior alternative, CEQA requires an alternative other than the No Project Alternative to be selected. Based on the environmental analysis presented in this Section, and as further summarized in Section V.F, Environmentally Superior Alternative, the Reduced Density Alternative (1.5:1) FAR alternative was selected as the environmentally superior alternative as it would be more effective in reducing vehicle trips that contribute to the traffic and roadway noise impacts. The reduction in trips would also serve to further reduce the proposed Project's less than significant impacts associated with air quality and greenhouse gas emissions. For these reasons, the Reduced Density (1.5:1) FAR Alternative was identified as the Environmentally Superior Alternative.

# V. Project Alternatives

# B. No Project Alternative

## 1. Description of the No Project Alternative

The No Project Alternative is the circumstance under which the proposed Project does not proceed. CEQA Guidelines (Section 15126.6(e)) provides that the "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what can reasonably be expected to occur in the foreseeable future if the project is not approved based on current plans and consistent with available infrastructure and community services. In February 2017, at the time the NOP was published for the proposed Project, the Project Site was developed with a 117,000 square-foot light manufacturing building including 87,000 square feet of manufacturing space, 25,000 square feet of warehouse space, and 5,000 square feet of production space.

Under the No Project Alternative, no buildings would be demolished and no new buildings would be constructed. Building repair and upgrades would be necessary for the commercial uses to remain occupied and viable. While it may be possible for commercial vacancies to fluctuate over time, the No Project Alternative assumes that the leasable area in the existing structure would remain similar to current conditions. As such, the Project Site's active land uses would include approximately 117,000 square feet of manufacturing, warehousing, and production space, as summarized in Table V.B-1, No Project Alternative Land Uses, below.

**Table V.B-1**
**No Project Alternative Land Uses**

| Land Use | Leasable Floor Area (sf) |
|---|---|
| Manufacturing | 87,000 |
| Warehouse | 25,000 |
| Production Space | 5,000 |
| **TOTAL** | **117,000** |

# 2. Environmental Analysis

## a) Aesthetics

The No Project Alternative would not involve any new construction or demolition associated with the proposed Project. No improvements or physical modifications would occur and the Project Site would remain in its present form. Therefore, views of the proposed Project would remain unchanged (refer to Figures IV.A-2 and IV.A-3 located in Section IV.A, Aesthetics, for existing views of the Project Site). Additionally, the No Project Alternative would retain the existing sources of lighting and glare on the Project Site and in the surrounding area. While the No Project Alternative includes no physical alterations to the current site, this alternative would not provide the benefit of improved views of the Project Site from public views and from the pedestrian paths that run along the south side and north side of the River. Therefore, aesthetic impacts under the No Project Alternative would be greater than under the proposed Project, but still less than significant.

## b) Air Quality

### (1) Construction

The No Project Alternative would not create any construction emissions, as demolition and construction activities would not occur. The No Project Alternative would have no impact when compared to the proposed Project's less than significant impacts with respect to air quality during the construction phase.

### (2) Operation

Operational air pollutant emissions are generated at the Project Site by existing manufacturing, warehousing, and production land uses. Stationary sources, such as space and water heating, architectural coatings (paint), consumer products and mobile vehicle traffic traveling to and from the Project Site contribute to the Project Site's existing emissions. The similar utilization of the Project Site as compared to existing conditions would create similar air pollution emissions from stationary sources and mobile sources. The No Project Alternative would not violate any air quality standards. Compared to existing conditions, the No Project Alternative would result in no increased air quality impacts, as shown in Table V.B-2, Existing Daily Operational Emissions from the Project Site. The No Project Alternative would have reduced air quality impacts when compared to the proposed Project's less than significant impacts.

**Table V.B-2**
**Existing Daily Operational Emissions from the Project Site**

| Emissions Source | Emissions in Pounds per Day | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
| **Summertime (Smog Season) Emissions** | | | | | | |
| Area Source | 2.61 | <0.01 | 0.01 | 0.00 | <0.01 | <0.01 |
| Energy | 0.06 | 0.57 | 0.48 | <0.01 | 0.04 | 0.04 |
| Mobile (Vehicles) | 1.35 | 6.63 | 20.18 | 0.06 | 4.22 | 1.18 |
| ***Total Emissions*** | ***4.02*** | ***7.20*** | ***20.67*** | ***0.06*** | ***4.26*** | ***1.22*** |
| **Wintertime (Non-Smog Season) Emissions** | | | | | | |
| Area Source | 2.61 | <0.01 | 0.01 | 0.00 | <0.01 | <0.01 |
| Energy | 0.06 | 0.57 | 0.48 | <0.01 | 0.04 | 0.04 |
| Mobile (Vehicles) | 1.30 | 6.85 | 18.78 | 0.05 | 4.22 | 1.18 |
| ***Total Emissions*** | ***3.97*** | ***7.42*** | ***19.27*** | ***0.05*** | ***4.26*** | ***1.22*** |

*Calculation data are provided in Appendix C to this Draft EIR.*
*Source: Parker Environmental Consultants, 2017.*

## c) Geology and Soils

### (1) Geology/Seismic Hazards

Under the No Project Alternative, the Project Site remains in its current condition and retains its current on-site operations. The No Project Alternative does not include the construction of any new structures or buildings. As such, the No Project Alternative would not result in any new sources or increased risk of loss, injury, or death involving strong seismic ground shaking, liquefaction, landslides, or ground failure on-site. The No Project Alternative would have no impact to geology and soils. When compared to the proposed Project's less than significant impacts, the No Project Alternative would have a reduced impact upon potential geotechnical hazards.

### (2) Paleontological Resources

The proposed Project would result in a less than significant impact upon paleontological resources, as the Project Site has been subject to past ground disturbing activities and, based on a records search by the Natural History Museum of Los Angeles County - Vertebrate Paleontology Department, no known Paleontological resources have been recorded within the Project Site. The No Project Alternative would not involve any earthwork or ground disturbing activities. As such, there would be no potential for any adverse impacts to occur to paleontological resources. When compared to the proposed Project, the No Project Alternative would have a reduced impact upon archaeological resources.

## d) Greenhouse Gas Emissions

### (1) Construction

The No Project Alternative would not create any construction related greenhouse gas emissions, since demolition and Project construction would not occur. Hence, the No Project Alternative would completely avoid construction GHG emissions when compared to the proposed Project's less than significant impacts.

### (2) Operation

GHG emissions are currently generated at the Project Site by stationary sources, such as space and water heating, electricity use, water use, solid waste generation, and mobile vehicle traffic traveling to and from the Project Site. It is reasonable to assume that there would be fluctuation in the active leasable area from time to time, but that utilization of the Project Site would remain similar to existing conditions. Greenhouse gas emissions from stationary sources and mobile sources would be similar to existing operations on-site. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. Under the current conditions, the Project Site generates approximately 1,831.72 $CO_2$eMT per year. These emissions would persist under the No Project Alternative and would be less than the 4,269.40 $CO_2$eMT per year net increase in emissions estimated to occur under the proposed Project. Therefore, like the proposed Project, GHG emissions under the No Project Alternative would be less than significant, but would be reduced as compared to the proposed Project.

## e) Hazardous Materials and Risk of Upset

The Project Site is identified on the following databases: FINDS, CA HAZNET, CA EMI, RCRA-LQG, US AIRS, and EDR US Historical Auto Station. The Project Site addresses were also identified in the EDR database report related to the former Taylor Yard facility of which the Project Site was a part. The current and historical use, storage, and generation of the hazardous materials and waste within the portion of the Project Site occupied by Nelson-Miller, Inc., the two former USTs and known chemical impacts to soil in the upper 11 feet bgs of the Project Site associated with the previous use of the Project Site as part of the former Taylor Yard railroad maintenance facility, and the known regional VOC-impacts to groundwater beneath the Project Site and Project Site vicinity are considered a HREC. The No Project Alternative does not include any construction or alterations to the Project Site and does not include any additional or new sources of hazardous materials that have not been previously in use. Additionally, the No Project Alternative would not remediate these existing conditions. Therefore, the No Project Alternative will not produce any new hazardous emissions or handle hazardous materials.

As such, no impact would occur. When compared to the proposed Project's less than significant impacts, the No Project Alternative would have a reduced impact upon hazards and risk of upset.

## f) Land Use and Planning

Under the No Project Alternative, the Project Site would experience no changes in land uses or changes to the condition of the Project Site. Since the No Project Alternative would result in no changes to the current land use and zoning designations or to the physical condition of the Project Site, the No Project Alternative would not resolve the current inconsistency between the Project Site's zoning and General Plan land use designation and proposed uses as well as the Los Angeles River. Compared to the proposed Project, the No Project Alternative would result in an increased impact with regards to land use and planning. However, like the proposed Project, the land use impacts under this Alternative would be less than significant.

## g) Noise

### (1) Construction

The No Project Alternative would involve no new construction. As such, no construction noise or vibration is anticipated to occur under this alternative. In the event any future upgrades or building renovation occurs, such activities would likely generate a temporary increase in noise levels during the permissible hours of construction. Noise related to interior renovations would be attenuated by the existing walls and windows of the structures and thus would not substantially increase noise levels within the broader Project area. Further, because the Project Site is already developed, no earthwork or grading activities would occur under this alternative. Thus, there would be no potential for groundborne construction vibration impacts. Under the No Project Alternative, impacts with respect to construction noise or vibration would be reduced as compared to the proposed Project's less than significant impacts.

### (2) Operation

The No Project Alternative would not introduce any new activities to the Project Site with the potential to create operational noise impacts or sensitive receptors with the potential to be impacted by noise impacts. Operation noise on-site would be typical of the manufacturing, warehousing, and production space noise, consistent with existing uses on-site. Under the No Project Alternative, no increased impact would occur with respect to operational noise. Impacts would be less than the proposed Project's less than significant impacts with respect to on-site operational noise.

The No Project Alternative would not result in an increase in vehicle trips during operations; therefore, noise levels along area roadways would not increase. Therefore, operational noise impacts under the No Project Alternative would be less than under the proposed Project, and this alternative would avoid the proposed Project's significant impact with respect to operational mobile noise impacts. Impacts with respect to operational noise would be reduced when compared to the proposed Project's less than significant impact.

## h) Population and Housing

The No Project Alternative would result in the continued operation of manufacturing, warehousing, and production uses on-site. No residential uses exist on-site. Under the No Project Alternative, no impact would occur with respect to population or housing. As this alternative would not provide the Project's beneficial impact of creating new housing, housing impacts would be greater under this alternative than under the proposed Project but also less than significant. The impact with respect to population would be reduced when compared to the proposed Project's less than significant impact.

## i) Public Services

The No Project Alternative does not include the construction of any new structures or buildings on-site. The similar occupancy of the existing on-site buildings would not increase the demand on local fire protection services, police protection services, schools, and parks compared to existing operations. Under the No Project Alternative, a less than significant impact would occur with respect to public services. When compared to the proposed Project, the No Project Alternative would have a reduced impact than the proposed Project's less than significant impact.

## j) Utilities and Service Systems

### (1) Water

The No Project Alternative would result in the continued operation of manufacturing, warehousing, and production land uses. The existing baseline water demand is approximately 9,767 gpd, which accounts for the manufacturing, warehouse, and production space on-site. The continuation of the existing on-site operations under the No Project Alternative would not generate any additional demands for water supply or facilities. When compared to the proposed Project, the No Project Alternative would have a reduced demand for water and thus a reduced environmental impact upon water resources as compared to the proposed Project's less than significant impact.

### (2) Wastewater

Under the No Project Alternative, the existing baseline wastewater generation is approximately 9,432 gpd, which accounts for the manufacturing, warehouse, and production space on-site. The Hyperion Water Reclamation Plant would continue to treat the wastewater from the Project Site under the No Project Alternative. Therefore, the No Project Alternative would have no impact upon wastewater. As compared to the proposed Project's less than significant impact, the No Project Alternative would have a reduced environmental impact upon wastewater treatment systems.

### (3) Solid Waste

Under the No Project Alternative, the existing baseline solid waste generation is approximately 1,956 lbs/day, which accounts for the manufacturing, warehouse, and production space on-site. The Sunshine Canyon Landfill and the Chiquita Canyon Landfill have sufficient capacity and would continue accepting solid waste from the Project Site. Therefore, the No Project Alternative would have no impact. When compared to the proposed Project's less than significant impact, the No Project Alternative would have a reduced environmental impact upon solid waste facilities.

### (4) Electric Power, Natural Gas and Telecommunications Infrastructure

#### *(a) Electric Power*

The LADWP currently provides electricity to the Project area with an overhead 4.8-kilovolt (kV) line and an overhead 34.5-kV line along Casitas Avenue adjacent to the Project Site. The Project Site currently generates a demand for approximately 1,298,700 kWh/year in electricity. Under the No Project Alternative, no new infrastructure improvements would be required and electricity use would be consistent with the existing baseline conditions. Impacts associated with electric power under the No Project Alternative would therefore be less than significant and reduced as compared to the proposed Project as no changes to the existing infrastructure would be required.

#### *(b) Natural Gas*

The Southern California Gas Company (SoCalGas) provides natural gas to the Project Site through existing gas mains located under the local street network. Based on the existing land uses presently being occupied on the Project Site, the existing natural gas demand is estimated to be 2,117,700 kbtu per year (cf/year) or approximately 173,015 cubic feet per month (cf/month). The continuation of the existing on-site operations under the No Project Alternative would not generate any increase in natural gas demands.

Therefore, the No Project Alternative would have no impact. When compared to the proposed Project's less than significant impact, the No Project Alternative would have a reduced impact as no changes to the existing infrastructure would be required.

*(c) Telecommunication Service*

The Project Site is currently developed with an operational warehouse/light manufacturing/film production use, and is served by existing telecommunications infrastructure. Under the No Project Alternative no changes to the existing telecommunications services would be required. As such, no impacts would occur. When compared to the proposed Project's less than significant impact, the No Project Alternative would have a reduced impact as no changes to the existing infrastructure would be required.

## k) Traffic/Transportation

### (1) Plan Consistency

The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Under the No Project Alternative, the cul-de-sac at Casitas Avenue at the Project Site would continue to be a dead end street and no through access would be provided to the adjacent future Bowtie Park parcel via the Project Site. As such, the No Project Alternative would maintain a traditional cul-de-sac which is designed to exclude through traffic. The additional pedestrian and bicycle connectivity to the adjacent future park project would not occur. As such, the No Project Alternative would be less consistent with the cul-de-sac policies of the Mobility Plan 2035 as compared to the Proposed Project.

### (2) VMT Analysis

Under the No Project Alternative, the vehicle miles traveled (VMT) were calculated and analyzed under the Work VMT/capita threshold and compared to the proposed Project. Because there are no residential dwelling units on the Project Site, the No Project Alternative would have no impact under the Household VMT/Capita threshold. However, for the Work VMT/Capita threshold, the No Project Alternative would result in a VMT ratio of 17.4 miles per worker, which is above the 12.7 Work VMT/Capita threshold. No mitigation measures would be implemented under the No Project Alternative. The proposed Project's Work VMT/Capita is 14.9 before mitigation and 14.2 with mitigation. Thus, the No Project Alternative would result in greater impacts as compared to the proposed Project.

# l) Cultural Resources

## (1) Historical Resources

The Project Site is located within the Taylor Yard Opportunity Area within the Los Angeles River corridor. Three archaeological sites have been recorded and 53 properties have been evaluated for historical significance. Seven historical buildings have been confirmed within the vicinity of the Taylor Yard Opportunity Area, none of which are located on the Project Site. Therefore, the No Project Alternative would have a less than significant impact upon cultural resources. When compared to the proposed Project, the No Project Alternative would have a reduced impact upon historic resources.

## (2) Archaeological Resources

The proposed Project would result in a less than significant impact upon archaeological resources, as the Project Site has been subject to past ground disturbing activities and, based on cultural resources records search conducted by the South Central Coastal Information Center (SCCIC), no known archaeological resources have been recorded within the Project Site. The No Project Alternative would not involve any earthwork or ground disturbing activities. As such, there would be no potential for any adverse impacts to occur to archaeological resources. When compared to the proposed Project, the No Project Alternative would have a reduced impact upon archaeological resources.

# m) Biological Resources

The Project Site consists of active commercial businesses and associated plantings of ornamental vegetation. No natural or semi-natural vegetation communities are present on the Project Site; plants present are non-native consisting of ornamental non-native trees and shrubs of several species. No wetland habitat was observed on-site. The No Project Alternative would result in the continued operation of manufacturing, warehousing, and production uses on-site. The No Project Alternative would not include the construction of any new structures or buildings. The No Project Alternative would not involve the removal of any existing on-site trees. As such, there would be no potential for any adverse impacts to occur to biological resources. Additionally, the No Project Alternative would not comply with the RIO plant palette; therefore, it would not provide the beneficial impact of providing additional trees/plants and complying with the RIO plant palette compared to the proposed Project. Nevertheless, when compared to the proposed Project, the No Project Alternative would have a reduced impact upon biological resources.

## n) Tribal Cultural Resources

As discussed in Section IV.N, Tribal Cultural Resources, there is no evidence of any known tribal cultural resources to be recorded on the Project Site. Considering the information available on Native American settlement patterns for the Glendale Narrows, historical disturbances, and soil data for the Project Site, SWCA concluded the Project Site was found to have a low sensitivity for containing unidentified tribal cultural resources. With incorporation of a one-day spot-check field consultation by the Gabrieleño Band of Mission Indians, impacts upon inadvertent finds of tribal cultural resources would be less than significant.

As the No Project Alternative would not involve any new grading or soil disturbance activities, no impacts upon tribal cultural resources would occur.

## o) Energy

Construction of the proposed Project would consume approximately 209,392 gallons of transportation fuel, including approximately 78,675 gallons of diesel and 130,717 gallons of gasoline. Additionally, the total estimated electricity use from construction activities is 25,915 kilowatt-hours (kWh). Under the No Project Alternative, no construction activities would take place. As such, no construction impacts would occur and impacts would be reduced as compared to the proposed Project.

Based on the existing land uses on the Project Site the existing electricity demand is approximately 1,298,700 kilowatt-hours per year (kWh/year). The existing natural gas demand is estimated to be 2,117,700 kbtu per year (cf/year) or approximately 173,015 cf/month. Under the No Project Alternative, no changes to the existing utility infrastructure or energy use would occur. While the No Project Alternative would utilize less energy than the proposed Project, the efficiency of building services (i.e., lighting, HVAC systems) would be comparatively less efficient than the proposed Project since the existing uses would not be subject to current Title 24 Standards, Cal Green, or the L.A. Green Building Code.

With respect to transportation energy, the existing land uses are estimated to generate an annual demand of 63,848 gallons of gas and 12,263 gallons of diesel per day as summarized in Section IV.O, Energy. Under the No Project Alternative, no changes to the existing transportation energy use would occur.

# 3. Relationship of the No Project Alternative to the Project Objectives

The No Project Alternative would avoid the proposed Project's significant and unavoidable operational traffic and operational mobile noise impacts. Under the No Project Alternative, the existing uses on-site would continue operation and no new buildings would be developed. As such, the No Project Alternative would not meet any of the Project objectives listed above and in Section II, Project Description. Specifically, the No Project Alternative would not achieve greater land use compatibility between uses on the Project Site and nearby existing and proposed recreational, residential, and school uses. Additionally, the No Project Alternative would not provide needed housing, would not create new jobs in the area, and would not create an environmentally sensitive development. As such, although the No Project Alternative would result in less impacts than the proposed Project, this alternative would not meet the identified Project objectives.

# V. Project Alternatives

# C. Reduced Density Alternative

## 1. Description of the Reduced Density Alternative

The Reduced Density Alternative is essentially a scaled down version of the proposed Project with a base FAR of 1.5:1 (as permitted by code), without the requested 35% increase in density for the provision of affordable housing on-site. Similar to the proposed Project, the Reduced Density Alternative would include the demolition of the existing 117,000 square-foot manufacturing/warehouse/production building and the construction of a mixed-use development with residential, office, restaurants, and an urban farm. Pursuant to LAMC Section 12.17.1.A.1, residential land uses are permitted in a CM Zone with compliance to the density regulations of the R3 Zone. As such, residential uses on the Project Site would be limited to one dwelling unit per 800 square feet (or approximately 310 dwelling units for the Project Site based on a lot area of 248,190 square feet). The Reduced Density Alternative would therefore provide a total of 310 multi-family residential units (approximately 308,285 square feet) and approximately 64,000 square feet of commercial space. The commercial space would be the same as proposed under the proposed Project and would include a mix of restaurant uses, office space, and an urban farm. A six-story parking garage (Building G), adjacent to Building A, would provide up to 562 parking spaces for the Project Site. As compared to the proposed Project, the Reduced Density Alternative Parking garage would be six stories instead of seven. The parking spaces would be provided in levels one through five, and an urban farm is proposed on the roof (sixth) level. In addition, open space and recreational amenities would comprise approximately 32,500 square feet in accordance with the LAMC requirements. A summary of the Project with the proposed unit mix and floor area is provided in Table V.C-1, Reduced Density Alternative Land Use Summary.

### a) Residential Uses

The Reduced Density Alternative would provide a total of 310 market rate multi-family residential units. The proposed residential units would include a combination of 88 studio units, 162 one-bedroom units, and 60 two-bedroom units as summarized in Table V.C-1, below.

**Table V.C-1**
**Reduced Density Alternative Land Use Summary**

| Land Uses | Dwelling Units | Floor Area (Square Feet) |
|---|---|---|
| ***Residential*** | | |
| Studio Units | 88 du | -- |
| One-Bedroom Units | 162 du | -- |
| Two-Bedroom Units | 60 du | -- |
| **Residential Subtotal** | **310 du** | **308,285 sf** [a] |
| ***Commercial*** | | |
| General Office | **--** | 19,000 |
| Restaurant | **--** | 3,000 |
| Urban Farm | **--** | 42,000 |
| **Commercial Subtotal** | **--** | **64,000 sf** |
| **TOTAL** | **310 du** | **372,285 sf** |

*Notes: du = dwelling unit; sf = square feet*
[a] *Includes residential amenity space.*

## b) Commercial Uses

Similar to the proposed Project, the Reduced Density Alternative would include approximately 64,000 square feet of commercial uses, including 19,000 square feet of general office, 3,000 square feet of restaurant space, and an approximate 42,000 square foot urban farm. The proposed commercial office space is proposed to be located on the ground floor of Building A, which is planned as a mixed-use building with residential units above the first level. The restaurant spaces would be located on the ground floor of Buildings B and C, oriented towards the LA River.

The proposed urban farm would occupy the sixth (roof) level of Building G and would include an enclosed greenhouse space for production of sustainable agriculture. As with the proposed Project, the concept of the urban farm is to provide for sustainable agriculture production within infill development sites. The urban farm would provide locally sourced, non-GMO, pesticide-free vegetables and herbs for the local restaurant and retail produce markets. The urban farm would utilize ecologically sustainable methods in a 100% renewable energy-powered, climate-controlled urban greenhouse.

A summary table describing the attributes and characteristics of the Reduced Density Alternative is provided in Table V.C-2, Summary of Reduced Density Alternative Program, below.

**Table V.C-2**
**Summary of Reduced Density Alternative Program**

| Project Characteristics | Required/Allowed By Code | Reduced Density Alternative |
|---|---|---|
| Project Site Lot Area | -- | 248,190 (5.7 acres) |
| Proposed Floor Area | 372,285 [a] | 372,285 square feet |
| Floor Area Ratio (FAR) | 1.5 : 1 | 1.5 : 1 |
| Maximum Building Height | unlimited | 85 feet |
| Open Space | 32,500 square feet | 32,500 square feet |
| Vehicle Parking Spaces | 498 stalls | 562 stalls [b] |
| Bicycle Parking Spaces | 356 spaces | 356 spaces |

[a] *Based on a allowable FAR of 1.5:1 and a total lot area of 248,190 square feet.*

[b] *Based on an average 1.4 parking spaces per dwelling unit to meet anticipated demand.*

## c) Architectural Features

Architectural materials for the proposed buildings under this alternative would be similar to the proposed Project and would include medium grain finish plaster (stucco), concrete fiberboard panel siding, aluminum frame casement windows, aluminum frame sliding doors, aluminum storefront glazing, roll up sectional garage door, glass, painted steel guardrail and design features, and cast-in-place concrete.

The Reduced Density Alternative would have the same general site plan layout and building design as proposed under the proposed Project, but at a reduced scale. Because this alternative would reduce the number of dwelling units as proposed under the proposed Project (by 109 units), and would result in the construction of 115,578 less square feet of floor area, the development of this Alternative would be accomplished by reducing the height of each building by one story.

## d) Open Space Recreational Amenities

The Reduced Density Alternative would include 58,176 square feet of open space. The open space requirements and amount of open space proposed for this Alternative are summarized in Table V.C-3 below. As shown, the Reduced Project Alternative would meet the LAMC code requirements for open space by providing approximately 32,500 square feet of common open space.

Similar to the proposed Project, the Reduced Density Alternative would feature a variety of trees, shrubs, vines, and perennials. Proposed landscaping would also feature a variety of ornamental streetscape and common area landscaping. Like the proposed Project, this

**Table V.C-3**
**Required and Proposed Open Space Calculations**

| Open Space Code Requirements | | | |
|---|---|---|---|
| **Type** | **Number of Units** | **Square Feet Required [a]** | **Total Square Feet Required** |
| Less than three habitable rooms (studio units and 1-bedroom units) | 250 | 100 sf / du | 25,000 |
| Three habitable rooms (2-bedroom) | 60 | 125 sf / du | 7,500 |
| | | **TOTAL** | **32,500** |
| **Open Space / Landscaping Features** | | **Area Proposed (Square Feet)** | |
| Ground Level | | 18,500 | |
| Porch Level | | 10,200 | |
| Second Level | | 3,800 | |
| **TOTAL OPEN SPACE PROPOSED** | | **32,500** | |

[a] *LAMC Section 12.21.G.2*

alternative would include communal patio, pool deck, lounge seating, outdoor barbeque, amenity deck, and community room space. Pursuant to the minimum tree requirements specified in LAMC Section 12.21G.2 (i.e., 1 tree per every 4 dwelling units), this alternative requires a minimum of 78 trees. The Reduced Density Alternative would include 78 trees. Similar to the proposed Project, the landscaping features would be provided at grade, on the porch levels and on the upper deck on balconies (private balconies), and in the common open space areas.

## e) Signage and Lighting

Similar to the proposed Project, the Reduced Density Alternative would provide site identification and tenant signage for the commercial land uses and way-finding signage in accordance with the regulations of the LAMC. Interior spaces to the site, including exterior walkways, accessways, open space areas, and fire lanes would be illuminated with low-level and directional lighting futures to provide for safe and secure pedestrian lighting environment. Lighting and illumination would conform to the illumination standards of the LAMC. Lighting fixtures would be designed and installed to ensure the direct light source cannot be seen from adjacent residential properties and/or the public right-of-way.

## f) Vehicle Parking

The Reduced Density Alternative would provide up to 562 parking spaces, all located within the proposed parking structure (Building G), which includes residential and commercial designated parking spaces. With up to 562 parking spaces provided on-site, the Reduced Density Alternative would provide 64 more spaces than the minimum spaces required by the LAMC. The proposed parking inventory would provide 1.4 spaces per dwelling unit to meet the proposed Project's anticipated parking demand. A summary of the Reduced Density Alternative's required and proposed parking spaces are provided in Table V.C-4, below. Because this alternative would include over 158 fewer parking spaces than proposed under the proposed Project, the parking structure would be one less level, with a maximum of six stories and a height of 71 feet.

**Table V.C-4**
**Summary of Required and Proposed Vehicle Parking Spaces**

| Description | Quantity | Parking Required by Code [a] | | Parking Provided |
|---|---|---|---|---|
| | | Rate | Spaces | |
| ***Residential*** | | | | |
| Less than three habitable rooms (studio and 1-bedroom units) | 250 du | 1 space / du | 250 | 314 |
| More than three habitable rooms (2-bedroom units) | 60 du | 2 spaces / du | 120 | 120 |
| | | ***Residential Subtotal*** | ***370*** | ***434*** |
| ***Commercial*** [b] | | | | |
| Commercial | 64,000 sf | 1 space / 500 sf | 128 | 128 |
| | | ***Commercial Subtotal*** | ***128*** | ***128*** |
| | | **TOTAL** | **498** | **562** |

*Notes: du = dwelling unit, sf = square feet*
[a] *LAMC Section 12.21.A.4*
[b] *The Project Site is located within an Enterprise Zone, which requires a minimum of 1 space/500 sf for commercial uses.*

## g) Bicycle Parking

The Reduced Density Alternative would provide bicycle parking in accordance with the City's Bicycle Ordinance. As summarized in Table V.C.-5, Summary of Required and Proposed Bicycle Parking Spaces, below, the Reduced Density Alternative would be required to provide 190 bicycle spaces, which includes 162 long-term bicycle spaces and 28 short-term bicycle spaces. Bicycle parking spaces would be provided on the first level of the proposed parking structure (Building G) and in outdoor bike parking areas.

**Table V.C-5**
**Summary of Required and Proposed Bicycle Parking Spaces**

| Description | Quantity | Bicycle Parking Requirements [a] | | Total Spaces Required | Parking Provided |
|---|---|---|---|---|---|
| | | Short Term | Long Term | | |
| *Residential* | | | | | |
| Dwelling Units 1-25 | 25 | 2 | 25 | 27 | 27 |
| Dwelling Units 26-100 | 75 | 5 | 50 | 55 | 55 |
| Dwelling Units 101-200 | 100 | 10 | 50 | 60 | 60 |
| Dwelling Units 201+ | 110 | 3 | 27 | 30 | 30 |
| Total Units | 310 du | 20 | 152 | 172 | 172 |
| *Commercial* | | | | | |
| Office (1 space /10K sf and 1 space/5K sf | 19,000 sf | 2 | 4 | 6 | 6 |
| Restaurant (1 space/2K sf) | 3,000 sf | 2 | 2 | 4 | 4 |
| Urban Farm (1 space/10 K sf) | 42,000 sf | 4 | 4 | 8 | 8 |
| | **TOTAL** | **28** | **162** | **190** | **190** |

*Notes: du = dwelling unit, sf = square feet*

[a] *Bicycle parking requirements pursuant to LAMC Section 12.21 A.16.*

## h) Floor Area Ratio (FAR) and Setbacks

The Project Site includes a total of 248,190 gross square feet of lot area. The Project Site is located in Height District No. 1, which limits development to an FAR of 1.5:1 but has no restriction on building height. Pursuant to the LAMC Section 12.2.1, the Project Site has an allowed floor area ratio (FAR) of 1.5 to 1. As such, Height District 1 would allow a maximum floor area of 372,285 square feet. The Reduced Density Alternative project would consist of approximately 372,285 square feet of total floor area (approximately 1.5:1 FAR).

The Reduced Density Alternative includes five buildings. Building A would include a maximum of five stories and approximately 71 feet above grade at the parapet. Buildings B, C, and D would include a maximum of four stories and approximately 50 feet above grade at the parapet. The Parking Garage and commercial uses proposed in Building G would include six stories with a building height of approximately 75 feet above grade.

Similar to the proposed Project, the Reduced Density Alternative would provide a minimum 10’ – 1” side yard setback from Building G along the northerly property line, a minimum 14’ – 2” front yard setback from the easterly property line fronting Building A, a minimum 37’ – 1” side yard setback from the easterly property line adjacent to Building

B, and a minimum 30’ – 2” rear yard setback from the southerly property line adjacent to Buildings C and D.

## i) Construction and Scheduling

As with the proposed Project, all construction activities under the Reduced Density Alternative would be performed in accordance with all applicable state and federal laws, and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Project would comply with these restrictions.

Due to the Project’s location at the terminus of Casitas Avenue, construction activities are not anticipated to require any lane closures on local streets. Site deliveries and the staging of all equipment and materials shall be organized on-site in the most efficient manner possible to avoid and minimize any temporary impacts upon the surrounding neighborhood. Construction equipment shall be staged on-site for the duration of construction activities.

The Reduced Density Alternative would involve the same general construction activities as the proposed Project on a daily basis, but give its reduced square footage the overall duration of construction would be incrementally shorter. Similar to the proposed Project, the Reduced Density Alternative would include the demolition of approximately 117,000 square feet of the existing building and the removal of the asphalt paved parking lot (3,000 cubic yards of asphalt) on the Project Site. The grading/excavation phase for the Reduced Density Alternative would also be the same as the proposed Project, as excavations up to approximately 15 feet deep would be required for earthwork removal and recompaction. Like the proposed Project, the Reduced Density Alternative would require approximately 6,900 cubic yards of soil to be hauled off-site in order to ensure a proper base for the building foundations. The proposed Haul Route and number of haul trips would be the same under this Alternative as proposed under the proposed Project.

## j) Entitlement Requests

The Reduced Density Alternative would seek three of the discretionary approvals as required under the proposed Project, However, since the Reduced Density Alternative would not provide any affordable housing units, it would not seek the associated density bonus or any incentives under LAMC Section 12.22.A.25, respectively. Accordingly, the Reduced Density Alternative would require the following entitlements:

1) Pursuant to LAMC Section 11.5.6, a **General Plan Amendment** to the Northeast Los Angeles Community Plan to change the land use designation from Heavy Manufacturing to Limited Industrial;

2) Pursuant to LAMC Section 12.32.Q, a Vesting **Zone Change and Height District Change** from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO;

3) Pursuant to LAMC Section 16.05.C.1(b), **Site Plan Review** for the development of 310 residential units and 64,000 square feet of commercial uses;

4) Pursuant to LAMC Section 13.08, a **Director's Determination (DIR)**, for compliance with the Cypress Park and Glassell Park Community Design Overlay;

5) Pursuant to LAMC Section 12.24.W.1, a **Conditional Use Permit (CUB)** to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption in conjunction with a proposed restaurant with 1,435 square feet of interior space and 838 square feet of exterior space, and 104 total seats, inclusive of outdoor seating;

6) Pursuant to LAMC Section 12.24.W.1, a **Conditional Use Permit (CUB)**, to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption in conjunction with a proposed beer garden with 845 square feet of interior space and 1,951 square feet of exterior space, and 105 total seats, inclusive of outdoor seating.

Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the proposed Project, including demolition permits, haul route approval, grading and associated building permits.

# 2. Environmental Analysis

## a) Aesthetics

As there are no views of scenic vistas available through, or scenic resources on, the Project site, the Reduced Density Alternative's impacts with respect to these issues would be the same as under the proposed Project and also less than significant.

Because the Reduced Density Alternative would reduce the number of dwelling units and construct 115,578 square feet less floor area, the height of each building would be reduced by one story as compared to the proposed Project. Similar to the proposed Project, parking would be provided in the parking structure (Building G), but would be one less level than the proposed Project, with a maximum of six stories and a height of 71

feet (14 feet less than the proposed Project). Like the proposed Project, the Reduced Density Alternative would be designed and landscaped in accordance with the Cypress Park and Glassell Park Community Design Overlay Design Guidelines (CDO Design Guidelines) and the RIO Design Guidelines. Also like the proposed Project, development of the Reduced Density Alternative would improve views of the Project Site from public views and from the pedestrian paths that run along the south side and north side of the River as compared to existing conditions. However, the Reduced Density Alternative would have less massing and a reduced height as compared to the proposed Project. Therefore, the visual character impacts of this Alternative would be less than the proposed Project's less than significant impact.

As the Reduced Density Alternative would have lighting and building materials to the proposed project, this alternative would have similar light and glare impacts as the proposed Project. Similar to the proposed Project, the Reduced Density Alternative would comply with Section 99.05.106.8, Light Pollution Reduction, of the City of Los Angeles Green Building Code (Ord. 182849) to ensure that lighting impacts would be reduced. With regards to nighttime lighting and daytime glare, the Reduced Density Alternative would result in a less than significant impact, similar to the proposed Project.

## b) Air Quality

### (1) Construction

As the Reduced Density Alternative would use the same construction equipment on a daily basis as the proposed Project, daily construction emissions under this alternative would be the same as the proposed Project. However, as the construction schedule would have an incrementally shorter duration than the proposed Project, the Reduced Density Alternative would generate less total construction emissions compared to the proposed Project. Similar to the proposed Project, the Reduced Density Alternative's construction TAC emissions would be short-term and would also result in a less than significant impact. Therefore, the air quality impacts of the Reduced Density Alternative would be considered less than the proposed Project's less than significant impacts.

### (2) Operation

The proposed Project would include a total of 419 dwelling units and 64,000 square feet of ground floor commercial uses. By comparison, the Reduced Density Alternative includes a total of 310 dwelling units and 64,000 square feet of ground floor commercial uses, a reduction of 109 dwelling units and 115,578 square feet of floor area as compared to the proposed Project. The commercial space would be the same as proposed under the proposed Project and would include a mix of restaurant uses, office space, and an

urban farm. As noted under the traffic impacts discussion, below, the Reduced Density Alternative would generate 688 fewer daily trips than the proposed Project. As such, this alternative's traffic volumes and associated mobile source emissions would be reduced as compared to the proposed Project. Similar to the proposed Project, the Reduced Density Alternative would not violate any air quality standards and would be required to implement all required SCAQMD rules and regulations. By meeting SCAQMD rules and regulations, the Reduced Density Alternative would also be consistent with the goals of the 2016 AQMP. Compared to the proposed Project, the Reduced Density Alternative would have reduced air quality emission impacts. As shown in Table V.C-6, Reduced Density Alternative Estimated Daily Operational Emissions, the Reduced Density Alternative would result in less than significant air quality impacts for all six criteria pollutants and operational emissions would be reduced as compared to the less than significant operational air quality emissions generated by the proposed Project.

**Table V.C-6**
**Reduced Density Alternative Estimated Daily Operational Emissions**

| Emissions Source | Emissions in Pounds per Day | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
| **Summertime (Smog Season) Emissions** | | | | | | |
| Area Source | 8.03 | 0.30 | 25.66 | <0.01 | 0.14 | 0.14 |
| Energy | 0.13 | 1.10 | 0.57 | <0.01 | 0.09 | 0.09 |
| Mobile (Vehicles) | 3.64 | 15.90 | 48.74 | 0.19 | 16.42 | 4.48 |
| ***Total Project Emissions*** | ***11.80*** | ***17.30*** | ***74.97*** | ***0.19*** | ***16.65*** | ***4.71*** |
| *Less Existing Project Site* | *-4.02* | *-7.20* | *-20.67* | *-0.06* | *-4.26* | *-1.22* |
| **Net Project Emissions** | **7.78** | **10.10** | **54.30** | **0.13** | **12.39** | **3.49** |
| **SCAQMD Thresholds** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potentially Significant** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Wintertime (Non-Smog Season) Emissions** | | | | | | |
| Area Source | 8.03 | 0.30 | 25.66 | <0.01 | 0.14 | 0.14 |
| Energy | 0.13 | 1.10 | 0.57 | <0.01 | 0.09 | 0.09 |
| Mobile (Vehicle) Sources | 3.45 | 16.21 | 45.44 | 0.18 | 16.42 | 4.48 |
| ***Total Project Emissions*** | ***11.61*** | ***17.61*** | ***71.67*** | ***0.18*** | ***16.65*** | ***4.71*** |
| *Less Existing Project Site* | *-3.97* | *-7.42* | *-19.27* | *-0.05* | *-4.26* | *-1.22* |
| **Net Project Emissions** | **7.64** | **10.19** | **52.40** | **0.13** | **12.39** | **3.49** |
| **SCAQMD Thresholds** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potentially Significant** | **No** | **No** | **No** | **No** | **No** | **No** |

*Note: Calculation worksheets are provided in Appendix N to this Draft EIR.*
*Source: Parker Environmental Consultants, 2018.*

## c) Geology and Soils

### (1) Geology/Seismic Hazards

As discussed in the Geotechnical Investigation for the Project Site, seismic hazards relating to surface rupture, liquefaction, lateral spreading, landsliding, subsidence, and collapse are considered low risk issues on the Project Site. The primary seismic hazard for the Project Site is the potential for strong ground motion. The Project Site is susceptible to ground motion and shaking as a result of potential movement along faults in the region. The Project Site is located in a seismically active region, as is all of Southern California. The Reduced Density Alternative would be designed and constructed in conformance with the most recently adopted California Building Code and Los Angeles Building Code design parameters, which are specifically tailored to minimize the risk of structure failure due to seismic hazards. Further, the design and construction of the Reduced Density Alternative would be subject to the review and approval of the Department of Building and Safety. Like the proposed Project, the Reduced Density Alternative would be required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter and Project's Geotechnical Investigation and the requirements outlined in the latest edition of the City of Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the LAMC, as discussed in Section IV.C, Geology and Soils. This alternative would have a less than significant impact with respect to seismic hazards. When compared to the proposed Project, the Reduced Density Alternative would have similar and essentially equivalent impacts upon potential seismic hazards.

Similar to the proposed Project, the Reduced Density Alternative's construction impacts on soil erosion, sedimentation, and stormwater management would be less than significant with compliance to the requirements outlined in the Chapter IX, Division 70 of the City's Uniform Building Code; the LID Ordinance 183,833; and the Standard Urban Stormwater Mitigation Plan (SUSMP), as stated in Section IV.C, Geology and Soils. The Reduced Density Alternative would be required to implement the soil erosion control measures and LID Ordinance to control soil erosion and sedimentation. Impacts would be similar to the proposed Project, and the Reduced Density Alternative would also result in a less than significant impact related to erosion and sedimentation impacts.

### (2) Paleontological Resources

The proposed Project would result in a less than significant impact upon paleontological resources, as the Project Site has been subject to past ground disturbing activities and, based on a records search by the Natural History Museum of Los Angeles County - Vertebrate Paleontology Department, no known paleontological resources have been

recorded within the Project Site. The Reduced Density Alternative would require similar construction activities as the proposed Project. Therefore, the Reduced Density Alternative would have a similar conclusion compared to the proposed Project and would result in a less than significant impact upon paleontological resources.

## d) Greenhouse Gas Emissions

### (1) Construction

The Reduced Density Alternative would have the same general construction activities on a daily basis as the proposed Project, since this alternative includes 109 less dwelling units and 115,578 square feet less floor area in the gross building area. However, the Reduced Density Alternative would overall generate less greenhouse gas emissions during construction compared to the proposed Project. Similar to the proposed Project, the Reduced Density Alternative would result in a less than significant impact, but construction GHG emissions would be reduced compared to the proposed Project.

### (2) Operation

Similar to the proposed Project, operation of the Reduced Density Alternative would generate air pollution emissions from stationary sources and mobile sources and contribute to increased greenhouse gas emissions compared to the existing operations on-site. The proposed Project would include a total of 419 dwelling units and 64,000 square feet of ground floor commercial uses. By comparison, the Reduced Density Alternative includes a total of 310 dwelling units and 64,000 square feet of ground floor commercial uses. The commercial space would be the same as proposed under the proposed Project and would include a mix of restaurant uses, office space, and an urban farm. The Reduced Density Alternative would develop 109 less dwelling units than the proposed Project's 419 dwelling units. The Reduced Density Alternative would comply with the same energy efficiency requirements of the L.A. Green Building Code, as applicable for a mixed-use residential and commercial project. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. With respect to operational GHG emissions from mobile sources, the Reduced Density Alternative would result in 688 fewer average daily trips as compared to the proposed Project. Thus, the operational GHG emissions associated with vehicles traveling to and from the Project Site during the operation of the Reduced Density Alternative would be reduced, as compared to the proposed Project.

As discussed in Section IV.D, Greenhouse Gas Emissions, the proposed Project's annual generation of GHG emissions is estimated to be 4,269.40 $CO_2e$ MTY. As shown in Table V.C-7, below, the Reduced Density Alternative's estimated annual GHG emissions is

**Table V.C-7**
**Reduced Density Alternative Operational Greenhouse Gas Emissions**

| Emissions Source | $CO_2e$ Emissions (Metric Tons per Year) |
|---|---|
| Area | 5.37 |
| Electricity | 1,206.43 |
| Natural Gas | 230.47 |
| Mobile | 2,978.26 |
| Waste | 49.30 |
| Water | 248.46 |
| ***Total Reduced Density Alternative:*** | ***4,718.29*** |
| *Less Existing Project Site:* | *-1,831.72* |
| **NET Reduced Density Alternative Emissions:** | **2,886.57** |
| *Calculation data and results provided in Appendix N to this Draft EIR.* | |

2,886.57 $CO_2e$ MTY, which is approximately 33 percent less than the proposed Project's GHG emissions. Compared to the proposed Project, the Reduced Density Alternative would have reduced impacts relating to greenhouse gas emissions. The Reduced Density Alternative would similarly result in a less than significant impact.

## e) Hazardous Materials and Risk of Upset

As described in Section IV.E, Hazardous Materials/Risk of Upset, the Project Site is identified on the following databases: FINDS, CA HAZNET, CA EMI, RCRA-LQG, US AIRS, and EDR US Historical Auto Station. The Project Site addresses were also identified in the EDR database report related to the former Taylor Yard facility of which the Project Site was a part. As such, the proposed Project would implement Project Design Feature HAZ-PDF-1, which requires the preparation and implementation of a Soil Management Plan to address potential hazardous substances and/or petroleum produces that may be encountered during construction. The Reduced Density Alternative would require similar construction activities as the proposed Project. As with the proposed Project, the Reduced Density Alternative's adherence to applicable regulatory compliance measures and implementation of HAZ-PDF-1 would mitigate any potential hazardous impacts during the construction phase to less than significant levels.

Additionally, the Los Feliz Charter School for the Arts (located less than 250 feet northeast of the Project Site) would be considered a sensitive receptor regarding hazardous materials exposure. Similar to the proposed Project, implementation of a soils management plan as described under HAZ-PDF-1 would ensure that the Reduced Density Alternative would have a less than significant impact upon the nearby school.

## f) Land Use and Planning

The Reduced Density Alternative would seek the same general discretionary actions with the exception of the requests associated with the Density Bonus for affordable housing and the vesting tentative tract map. Since the Reduced Density Alternative would not provide any affordable housing units, it would not seek any of the associated land use incentives under LAMC Section 12.22.A.25. The Reduced Density Alternative would still request a General Plan Amendment, Zone Change, and Height District Change. With approval of the requests, the Reduced Density Alternative would be in conformance with applicable provisions of the LAMC and General Plan. The Reduced Density Alternative would also not conflict with local and regional plans applicable to the Project Site. Similar to the proposed Project, the Reduced Density Alternative would be consistent with several effective strategies to reduce future resident's exposure to poor ambient air quality from the Glendale Freeway. Land use impacts would be less than significant under this alternative. Therefore, the Reduced Density Alternative would generate similar land use impacts to the proposed Project's less than significant impacts.

## g) Noise

### (1) Construction

As discussed in Section IV.G, Noise, the construction-related noise and groundborne vibration impacts associated with the proposed Project would be less than significant. The day-to-day noise levels during active construction periods are anticipated to be the same as the proposed Project under the Reduced Density Alternative. The same construction code compliance requirements identified in Section IV.G, Noise, would also be applicable to this alternative. Thus, construction noise and vibration impacts under the Reduced Density Alternative would have similar construction noise levels as compared to the proposed Project's less than significant impacts, however, because the duration of construction would be shorter, construction noise impacts would be reduced.

### (2) Operation

The operational noise generated under the Reduced Density Alternative would be typical of residential and commercial land uses. The Reduced Density Alternative's noise levels associated with outdoor noise sources, on-site mechanical equipment, and noise generated within the parking garage would be less than significant, similar to the proposed Project. With respect to roadway noise levels, the Reduced Density Alternative would result in 688 less trips per day. The Reduced Density Alternative is anticipated to generate significant roadway noise impacts at one roadway segment: 1) La Clede Avenue, between Fletcher Drive and Carillon Street, though at lower noise levels than the

proposed Project (see Appendix O to this Draft EIR). The mitigation measure regarding traffic management (i.e., Mitigation Measure TRANS-MM-3) would also be applicable to this alternative. Since the Reduced Density Alternative would result in fewer trips, the roadway noise impact would be less than the proposed Project, but operational noise impacts from roadway noise would be significant and unavoidable under the Reduced Density Alternative, similar to the proposed Project.

## h) Population and Housing

As discussed in Section IV.H, Population and Housing, the proposed Project would be consistent with the Northeast Los Angeles Community Plan and the SCAG 2016-2040 RTP/SCS growth projections with respect to population and housing. The Reduced Density Alternative includes a total of 310 dwelling units, which is 109 dwelling units less than the proposed Project's 419 dwelling units. Because the Reduced Density Alternative would provide less housing and generate fewer residents than the proposed Project, the Reduced Density Alternative would also be consistent with the Northeast Los Angeles Community Plan and the SCAG 2016-2040 RTP/SCS growth projections. The impact to population under this alternative would also be less than significant and would be reduced compared to the proposed Project. However, as this alternative would not provide the Project's beneficial impact of creating new housing, housing impacts would be greater under this alternative than under the proposed Project but also less than significant.

## i) Public Services

The proposed Project was found to have a less than significant impact on fire protection services, schools, parks, and libraries. With only 310 dwelling units, the Reduced Density Alternative would have incrementally reduced impacts with respect to fire protection services, police protection services, schools, parks, and libraries. Similar to the proposed Project, the Reduced Density Alternative would implement Project Design Features POL-PDF-1 through POL-PDF-3, with regard to public safety to reduce impacts upon police services to less than significant levels. In addition, this Alternative would pay mandatory school fees to the LAUSD and applicable parks fees to the City of Los Angeles Department of Recreation and Parks. When compared to the proposed Project, the Reduced Density Alternative would have reduced impacts on fire protection services, police protection services, schools, parks, and libraries as compared to the proposed Project's less than significant impacts.

## j) Utilities and Service Systems

### (1) Water

Impacts associated with local water conveyance and infrastructure upgrades are anticipated to be similar under the Reduced Density Alternative as compared to the proposed Project and would be less than significant. Under the proposed Project, the anticipated water demand is expected to result in a net increase of 85,023 gallons per day or approximately 95 acre-feet of water per year. Comparatively, as shown in Table V.C-8, below, the net water demand associated with the Reduced Density Alternative would be approximately 72,593 gpd or 81 acre-feet per year, which is roughly 14 percent less than the proposed Project's water demand.

As discussed in Section IV.J-1, Water, the 2015 UWMP has evaluated the City's water supply in comparison to SCAG's RTP growth projections and has determined that the City has adequate capacity to serve the anticipated growth in the region. Similar to the proposed Project, because this alternative would not exceed the planned growth projections for SCAG's growth projections for the Los Angeles subregion, the projected demands associated with this alternative can be accommodated by the City's water supply. Therefore, similar to the proposed Project, the Reduced Density Alternative would result in less than significant impacts. Compared to the proposed Project, impacts regarding future water demands would be reduced under this alternative.

## Table V.C-8
## Estimated Water Demand by Reduced Density Alternative

| Type of Use | Quantity Unit | Water Use (gpd/unit) [a] | Proposed Water Demand (gpd) | (AFY) |
|---|---|---|---|---|
| **Existing Uses** | | | | |
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 | |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 | |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 | |
| Landscaping | 7,150 sf | (MAWA)[b] | 335 | |
| | | **Existing Water Demand:** | **9,767** | **11** |
| **Reduced Density Alternative** | | | | |
| **Residential Units (310 total du)** | | | | |
| Studio | 88 du | 75 gpd/du | 6,600 | |
| One Bedroom | 162 du | 110 gpd/du | 17,820 | |
| Two-Bedroom | 60 du | 150 gpd/du | 9,000 | |
| Swimming Pool and Spa | 5,056 cu. ft. [c] | 7.78 gpd / cu. ft. | 39,336 | |
| | | ***Residential Total:*** | ***72,756*** | ***81*** |
| **Commercial Uses (64,000 total sf)** | | | | |
| Office | 19,000 sf | 0.120 gpd/sf | 2,280 | |
| Restaurant (3,000 sf [d]) | 133 seats | 30 gpd/seat | 3,990 | |
| Urban Farm | 42,000 sf | -- [e] | 3,334 | |
| | | ***Commercial Subtotal:*** | ***9,604*** | ***11*** |
| | | **Total Reduced Density Alternative Water Demand:** | **82,360** | **92** |
| | | *Minus Existing Demand:* | *- 9,767* | *- 11* |
| | | **Net Additional Water Demand:** | **72,593** | **81** |

*Notes: du: dwelling unit, sf: square feet, gpd: gallons per day; AFY: acre feet per year*
*All numbers rounded to the nearest gpd or AFY.*

[a] *Based on sewer generation rates provided in the City's L.A. Sanitation, Wastewater Engineering Services Division correspondence letter, dated April 20, 2017 (See Appendix B to this DEIR).*

[b] *Water demand for existing landscaped areas was based on approximately 7,150 sf of existing landscaped area and the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (MAWA)(LA Green Building Code Sec. 99.04.304).*

[c] *The estimate for swimming pools is conservative as it is based on replacing the entire volume of water on a daily basis.*

[d] *Restaurant seats were estimated based on 15 sf per seat for the dining area, which was assumed to occupy 2/3 of the restaurant space. Rates were estimated on indoor seating for a conservative estimate.*

[e] *Based on the City of Los Angeles Bureau of Sanitation's estimate contained in the correspondence (dated April 20, 2017) in response to the NOP. (See Appendix B to this EIR).*

[f] *Landscaping water demand for the proposed Project was based on 15,486 square feet of landscaped open space area and the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304).*

*Source: Parker Environmental Consultants, 2019.*

### (2) Wastewater

As concluded in Section IV.J-2, Wastewater, the existing local wastewater infrastructure would be expected to adequately serve the proposed Project and the anticipated wastewater flows would be less than significant and within the treatment capacity of the Hyperion Water Reclamation Plant. Under the proposed Project, the anticipated wastewater generation is expected to result in a net increase of 84,633 gpd. Comparatively, as shown in Table V.C-9, below, the net wastewater generation associated with the Reduced Density Alternative would be approximately 72,928 gpd, or roughly 16 percent less than the proposed Project's wastewater generation.

**Table V.C-9**
**Estimated Wastewater Generation by Reduced Density Alternative**

| Type of Use | Size | Wastewater Demand Rate (gpd/unit) [a] | Total Wastewater Demand (gpd) |
|---|---|---|---|
| **Existing Uses** | | | |
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 |
| | | **Existing Wastewater Generation:** | **9,432** |
| **Reduced Density Alternative** | | | |
| **Residential Units (310 total du)** | | | |
| Studio | 88 du | 75 gpd/du | 6,600 |
| One Bedroom | 162 du | 110 gpd/du | 17,820 |
| Two-Bedroom | 60 du | 150 gpd/du | 9,000 |
| Swimming Pool and Spa [b] | 5,056 cu. ft. | 7.78 gpd/cu. ft. | 39,336 |
| | | ***Residential Subtotal:*** | ***72,756*** |
| **Commercial Uses (64,000 total sf)** | | | |
| Office | 19,000 sf | 0.12 gpd/sf | 2,280 |
| Restaurant (3,000 sf) | 133 seats [c] | 30 gpd/seat | 3,990 |
| Urban Farm | 42,000 sf | --[d] | 3,334[d] |
| | | ***Commercial Subtotal:*** | ***9,604*** |
| | | **Total Reduced Density Alternative Wastewater Generation:** | **82,360** |
| | | *Less Existing Wastewater Generation:* | *-9,432* |
| | | **NET TOTAL Wastewater Generation:** | **72,928** |

*Notes: sf =square feet; du = dwelling units, gpd: gallons per day*

[a] *Based on correspondence with the City of Los Angeles Bureau of Sanitation (dated April 20, 2017). See Appendix B to this DEIR.*

[b] *It is assumed that the swimming pool and spa would remain the same size as the Project.*

[c] *Seats were estimated based on 15 sf per seat for the dining area, which was assumed to occupy two-thirds of the restaurant space.*

[d] *The City of Los Angeles Bureau of Sanitation (dated April 20, 2017) estimates that the urban farm would generate 100,000 gallons per month of wastewater. 3,333 gpd was estimated based on 100,000 gal/month / 30 days/month. See Appendix B to this DEIR.*

*Parker Environmental Consultants, 2019.*

With respect to anticipated wastewater generation, the Reduced Density Alternative would result in a decrease in wastewater generation. As the projected demands associated with the Reduced Density Alternative are less than the proposed Project, the same conclusion can be reached that this alternative can be adequately accommodated by the City's wastewater infrastructure and treatment facilities without any significant impact to the environment. Similar to the proposed Project, the Reduced Density Alternative would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. Compared to the proposed Project, impacts regarding future wastewater generation would be reduced under this alternative.

### (3) Solid Waste

#### *(a) Construction*

Similar to the proposed Project, the Reduced Density Alternative would comply with all federal, state and local statutes and regulations related to solid waste and impacts would be less than significant. The proposed Project's demolition and construction activities are estimated to generate approximately 10,658 tons of debris. Comparatively, as shown in Table V.C-10, below, the Reduced Density Alternative would generate 10,405 tons of construction and demolition debris, which equates to roughly 2 percent decrease in the solid waste material as compared to the proposed Project. Similar to the proposed Project, all construction and demolition debris generated by the Reduced Density Alternative would be delivered to a Certified Construction and Demolition Waste Processing Facility. Similar to the conclusion regarding the proposed Project, the amount of solid waste generated during construction of the Reduced Density Alternative would fall well within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be similar to the proposed Project and less than significant.

**Table V.C-10**
**Estimated Construction and Demolition Debris by the Reduced Density Alternative**

| Construction Activity | Size | Rate (lbs./sf) [a b] | Generated Waste (tons) |
|---|---|---|---|
| ***Demolition*** | | | |
| Industrial Building | 117,000 sf | 155 lbs/sf | 9,068 |
| **Total Demolition Debris Generation:** | | | **9,068** |
| ***Construction*** | | | |
| Multi-Family Residential | 308,285 sf | 4.39 lbs/sf | 677 |
| Commercial | 64,000 sf | 4.34 lbs/sf | 139 |
| Parking Garage | 240,000 sf | 4.34 lbs/sf | 521 |
| **Total Construction Debris Generation:** | | | **1,337** |
| **Reduced Density Alternative NET TOTAL:** | | | **10,405** |

*Notes: sf = square feet; lbs = pounds*
[a] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[b] *United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003.*
*Source: Parker Environmental Consultants, 2019.*

*(b) Operation*

Similar to the proposed Project, operation of the Reduced Density Alternative would cause on-going generation of solid waste throughout the lifespan of this alternative. As discussed in Section IV.J-3, Solid Waste, the proposed Project would generate approximately 3,883 pounds (1.94 tons) of solid waste per day, or approximately 709 tons per year. Comparatively, as shown in Table V.C-11 below, the Reduced Density Alternative would generate approximately 2,550 lbs/day of solid waste or approximately 465 tons per year. Operational solid waste under the Reduced Density Alternative would be approximately 34 percent less solid waste generated by the proposed Project. Therefore, similar to the proposed Project, solid waste impacts under the Reduced Density Alternative would be less than significant. Compared to the proposed Project, the operational solid waste impacts would be reduced under the Reduced Density Alternative.

**Table V.C-11**
**Estimated Operational Solid Waste Generation by Reduced Density Alternative**

| Type of Use | Size | Solid Waste Generation Rate [a] (lbs/unit/day) | Total Solid Waste Generated (lbs/day) |
|---|---|---|---|
| **Existing Uses** | | | |
| Industrial (117,000 sf) | 219 emp [b] | 8.93 lbs/emp/day | 1,956 |
| ***Subtotal Existing Solid Waste Generation:*** | | | ***1,956*** |
| **Reduced Density Alternative** | | | |
| Multi-Family Residential | 310 du | 12.23 lbs/du/day | 3,791 |
| Office | 19,000 sf | 0.006 lbs/sf/day | 114 |
| Restaurant (3,000 sf) | 22 emp [b] | 10.53 lbs/emp/day | 232 |
| Urban Farming (42,000 sf) | 35 emp [c] | 10.53 lbs/emp/day | 369 |
| ***Total Reduced Density Alternative Solid Waste Generation:*** | | | ***4,506*** |
| *Less Existing Uses:* | | | *-1,956* |
| **NET TOTAL Solid Waste Generation:** | | | **2,550** |

*Notes: sf =square feet; du = dwelling units; emp = employee*
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were projected based on 1 employee per 535 square feet of manufacturing business, 1 employee per 134 square feet of restaurant space. Source: U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*
[c] *The Mobility Plan, Bow Tie Lofts Project Traffic Study, December 23, 2016.*
*Source: Parker Environmental Consultants, 2017.*

### (4) Electric Power, Natural Gas, and Telecommunications Infrastructure

#### *(a) Electric Power*

Under the proposed Project, the total estimated electricity use from construction activities would be 5,915 kilowatt-hours (kWh), which is less than the demand generated by the existing uses. Similar to the proposed Project, construction of the Reduced Density Alternative would be serviced by the existing electric infrastructure serving the Project Site. Energy demands associated with construction equipment would require less power than existing land uses in operation at the Project Site. Thus, similar to the proposed Project, construction impacts upon electric power infrastructure would be less than significant.

The proposed Project's operational net increase in electricity demand is estimated to be approximately 1,337,720 kWh/year (see Table IV.O-5, in Section IV, O, Energy). By comparison, the estimated net increase in electricity demand by the Reduced Density Alternative is estimated to be approximately 862,970 kWh/year (see Table V.C-12, under

the Energy subheading below). Similar to the proposed Project, establishing electric power service to the Reduced Density Alternative would involve disconnecting existing power connections and establishing new connections to serve the proposed structures. Such improvements would be localized in nature and would include service connections to overhead power poles and/or existing underground transformers. Thus, the Reduced Density Alternative would result in similar less than significant impacts upon electric infrastructure, though impacts associated with electricity use would be slightly reduced.

*(b) Natural Gas*

The proposed Project's operational net increase in natural gas demand is estimated to be 3,372,230 kbtu/year, or approximately 275,509 cubic feet cf/month. As shown in Table V.C-13 (under the Energy subheading below), the estimated net increase in natural gas demands by the Reduced Density Alternative would be approximately 177,746 cf/month, which is roughly 35 percent less than the natural gas demand of the proposed Project. Similar to the proposed Project, it is not anticipated that any new natural gas distribution infrastructure or facilities would be constructed or expanded as a result of the Reduced Density Alternative. The Reduced Density Alternative would connect to the existing infrastructure serving the Project area. However, impacts associated with utility connections would be temporary in nature, and thus would result in less than significant impacts upon the environment. Therefore, impacts associated with natural gas infrastructure under this alternative would be less than significant and similar to the proposed Project.

*(c) Telecommunications Infrastructure*

The Project Site is currently developed with an operational warehouse/light manufacturing/film production use and is served by existing telecommunications infrastructure. Similar to the proposed Project, the Reduced Density Alternative would be served by the existing telecommunications services that service the Project Site and surrounding area. When compared to the proposed Project's less than significant impact, the Reduced Density Alternative would have similar less than significant impacts upon existing telecommunications facilities.

# k) Traffic/Transportation

## (1) Plan Consistency

The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Similar to the proposed Project, the Reduced Density Alternative would provide pedestrian and bicycle connectivity through

the Project Site to the adjacent future Bowtie Park parcel. As such, the Reduced Density Alternative would have similar less than significant impacts with respect to not conflicting with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

### (2) VMT Analysis

Under the Reduced Density Alternative, the vehicle miles traveled (VMT) were calculated and analyzed under the Household VMT/Capita threshold and the Work VMT/Capita threshold and compared to the proposed Project. For the Household VMT/Capita threshold, the Reduced Density Alternative would result in a VMT ratio of 12.9 miles per household, which is the same as the proposed Project but above the 7.2 Household VMT/Capita threshold. Thus, the Household VMT/Capita impact would be significant and the same under this alternative as compared to the proposed Project.

For the Work VMT/Capita threshold, the Reduced Density Alternative would result in a Work VMT/Capita 15.4 miles per worker, which is above the 12.7 Work VMT/Capita threshold.

With mitigation, the Project's Household VMT/Capita impact would be reduced to 10.5 miles per household and the Work VMT/Capita would be reduced to 14.2 miles per worker. The Reduced Density Alternative would employ similar VMT-related mitigation measures as proposed for the Project with respect to parking, education/ encouragement, shared mobility, bicycle infrastructure, and neighborhood enhancement. With Mitigation, the Household VMT/Capita impact would be reduced to 10.5 miles per household and the Work VMT/Capita would be reduced to 14.3 miles per worker. However, impacts would still remain significant. Such impacts would be that same as the proposed Project with respect to the Household VMT/Capita and greater than the proposed Project with respect to the Work VMT/Capita thresholds. As such, this alternative would not be effective in reducing the proposed Project's VMT impacts.

## I) Cultural Resources

### (1) Historical Resources

Under the proposed Project, no known historical resources would be impacted from the construction of the proposed Project. The Reduced Density Alternative would require similar construction activities as the proposed Project. Therefore, the Reduced Density Alternative would have a similar conclusion compared to the proposed Project and would result in a less than significant impact upon historic resources.

### (2) Archaeological Resources

As discussed in Section IV.L, Cultural Resources, the proposed Project would result in a less than significant impact upon archaeological resources since the Project Site has been subject to past ground disturbing activities; and based on cultural resources records search conducted by the South Central Coastal Information Center (SCCIC), no known archaeological resources have been recorded within the Project Site. Nevertheless, the proposed Project would implement Mitigation Measure CUL-MM-1, CUL-MM-2 and CUL-MM-3, which would reduce Project impacts on archaeological resources to a less than significant level in the unlikely event that any archaeological resources are found during the construction phase. It is anticipated that the Reduced Density Alternative would create similar impacts to archaeological resources, since the construction activities would be similar to the proposed Project. The Reduced Density Alternative would also implement the same mitigation measures as recommended under the proposed Project. When compared to the proposed Project, this alternative would result in a similar conclusion and would have a less than significant impact to archaeological resources with mitigation.

## m) Biological Resources

The Project Site consists of active commercial businesses and associated plantings of ornamental vegetation. No natural or semi-natural vegetation communities are present on the Project Site; plants present are non-native consisting of ornamental non-native trees and shrubs of several species. No wetland habitat was observed onsite. The Reduced Density Alternative would be nearly identical to the proposed Project with the exception of 109 less dwelling units than the proposed Project. The Reduced Density Alternative would require similar construction and operational activities as the proposed Project. The demolition of the existing conditions for the operation of the Reduced Density Alternative would not destroy any biological resources. Thus, impacts upon biological resources would be similar to the proposed Project and less than significant under the Reduced Density Alternative.

## n) Tribal Cultural Resources

As discussed in Section IV.N, Tribal Cultural Resources, there is no evidence of any known tribal cultural resources to be recorded on the Project Site. Considering the information available on Native American settlement patterns for the Glendale Narrows, historical disturbances, and soil data for the Project Site, SWCA concluded the Project Site was found to have a low sensitivity for containing unidentified tribal cultural resources. With incorporation of a one-day spot-check field consultation by the Gabrieleño Band of Mission Indians (see TCR-PDF-1), impacts upon inadvertent finds of tribal cultural resources would be less than significant.

The Reduced Density Alternative would involve the same levels of earthwork and grading activity as the proposed Project. As such, impacts would be similar to the proposed Project, and this alternative would incorporate the same project design feature (PDF TCR-1) to ensure impacts associated with inadvertent finds are reduced to less than significant levels. Similar to the proposed Project, the Reduced Density Alternative would result in less than significant impacts upon Tribal Cultural Resources.

## o) Energy

### (1) Construction

Construction of the proposed Project would consume approximately 209,392 gallons of transportation fuel, including approximately 78,675 gallons of diesel and 130,717 gallons of gasoline. Additionally, the total estimated electricity use from construction activities is 25,915 kilowatt-hours (kWh). Under the Reduced Density Alternative, construction impacts would be slightly reduced as the amount of gross new building area would be reduced. Impacts upon energy use would be reduced as compared to the proposed Project. However, both the proposed Project and the Reduced Density Alternative would be subject to the same energy conservation requirements as described in Section IV,O Energy. As such, construction impacts related to energy conservation would be less than significant but further reduced under this alternative as there would be less building construction.

### (2) Operation

#### *(i) Electricity*

As discussed in Section IV.O, Energy, the estimated net increase in electricity consumption by the proposed Project would be approximately 1,337,720 kilowatt hours per year (kWh/year). As shown in Table V.C-12, below, the estimated net increase in electricity consumption by the Reduced Density Alternative would be approximately 862,970 kWh/year, which is roughly 35 percent less energy demand than the proposed Project. The projected increase in electrical demand due to the proposed Project would not have an adverse impact on its electrical system. Energy supplies are adequate to serve the proposed Project and the installation of needed new infrastructure would not be expected to result in any significant secondary environmental effects. Similar to the proposed Project, the Reduced Density Alternative would meet Title 24 energy efficiency requirements and further reduce demand for electricity under the Reduced Density Alternative. Because the Reduced Density Alternative would demand less energy than the proposed Project, impacts would also be similarly less than significant and reduced as compared to the proposed Project.

**Table V.C-12**
**Estimated Electricity Demand by Reduced Density Alternative**

| Land Use | Size | Total Electricity Demand (kWh/year)[a] |
|---|---|---|
| **Existing Land Uses** | | |
| General Light Industrial | 117,000 sf | 1,298,700 |
| **Existing Electricity Demand:** | | **1,298,700** |
| **Reduced Density Alternative Uses** | | |
| Multi-Family Residential | 310 du | 1,223,720 |
| Office | 19,000 sf | 246,810 |
| Restaurant | 3,000 sf | 132,420 |
| Urban Farming | 42,000 sf | 0 [b] |
| Parking Structure | 562 spaces | 558,720 |
| **Total Reduced Density Alternative Electricity** | | **2,161,670** |
| *Less Existing Electricity Demand:* | | *-1,298,700* |
| **NET TOTAL Electricity Demand:** | | **862,970** |

*Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour*

[a] *California Emissions Estimator Model (CalEEMod)v.2016.3.2, Existing Conditions Annual Emissions Worksheets See Appendix N, Project Alternatives AQ and GHG Modeling Worksheets).*

[b] *Similar to the proposed Project, the proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate-controlled urban greenhouse.*

*Source: Parker Environmental Consultants, 2019.*

### *(b) Natural Gas*

The proposed Project's net natural gas demands are estimated to be approximately 3,372,230 kbtu/year, or approximately 275,509 cf/month. As shown in Table V.C-13, below, the estimated net increase in natural gas demands by the Reduced Density Alternative would be approximately 177,746 cf/month, which is roughly 35 percent less than the natural gas demand of the proposed Project. Similar to the proposed Project, the Reduced Density Alternative would promote energy conservation in accordance with the policies identified in Title 24 and the L.A. Green Building Code. Implementation of regulatory compliance measures that meet Title 24 and L.A. Green Building Code energy efficiency requirements would further reduce demand for natural gas. Additionally, as discussed above, the proposed urban farm would utilize ecologically sustainable methods in a 100 percent renewable solar energy-powered, climate- controlled urban greenhouse. Thus, energy conservation impacts associated with natural gas use would be similarly less than significant but reduced under the Reduced Density Alternative.

**Table V.C-13**
**Estimated Natural Gas Demand By Reduced Density Alternative**

| Land Use | Size | Natural Gas Demand Rate (kbtu/year) [a] | Total Natural Gas Demand (cf/month) [b] |
|---|---|---|---|
| **Reduced Density Alternative** | | | |
| Multi-Family Residential | 310 du | 3,403,240 | 278,042 |
| Office | 19,000 sf | 197,790 | 16,159 |
| Restaurant | 3,000 sf | 692,280 | 56,559 |
| Urban Farm | 42,000 sf | 0 | 0 |
| **Total Proposed Project Natural Gas Demand:** | | **4,293,310** | **350,761** |
| *Less Existing Natural Gas Demand [b]:* | | -2,117,700 | *-173,015* |
| **NET TOTAL Natural Gas Demand:** | | **3,372,230** | **177,746** |

*Notes: sf =square feet; du = dwelling unit*
[a] *California Emissions Estimator Model (CalEEMod) v.2016.3.2, Proposed Project Annual Emissions Worksheets See Appendix N, Project Alternatives AQ and GHG Modeling Worksheets).*
[b] *1 cubic feet (cf) of natural gas = 1.02 kBtu.*
*Source: Parker Environmental Consultants, 2019.*

*(c) Transportation Fuels*

With respect to transportation energy, under the proposed Project, the proposed land uses are estimated to generate an annual demand of 283,101 gallons of gasoline and 75,211 gallons of diesel on an annual basis as summarized in Section IV.O, Energy. The Reduced Density Alternative is estimated to generate an annual demand of 263,961 gallons of gasoline and approximately 67,119 gallons of diesel fuel, representing a reduction in fuel demand by 7 percent for gasoline and 11 percent for diesel fuel. As such, impacts associated with transportation fuel demand would be less than significant but further reduced under this alternative.

# 3. Relationship of the Reduced Density Alternative to the Project Objectives

Under the Reduced Density Alternative, the same land uses as the proposed Project would be developed, but without the 35% increase in density, resulting in 310 market rate dwelling units, compared to 419 for the proposed Project. Therefore, the Reduced Density Alternative would meet almost all of the Project objectives listed above and in Section II, Project Description. Specifically, the only objective the Reduced Density Alternative would not meet is to:

- Address the City's critical housing needs by providing a range of housing types and sizes, including affordable housing.

The Reduced Density Alternative would provide market rate units and would not provide any affordable housing units, and as such, would not meet this objective. Nevertheless, the Reduced Density Alternative would achieve greater land use compatibility between uses on the Project Site and nearby existing and proposed recreational, residential, and school uses. Additionally, the Reduced Density Alternative would provide needed housing, create new jobs in the area, and would create an environmentally sensitive development. As such, the Reduced Density Alternative would generally meet almost all of the identified Project objectives.

# V. Alternatives

# D. Commercial Office Alternative

## 1. Description of the Commercial Office Alternative

The Project Site has a current land use designation of Heavy Manufacturing and is currently zoned as [Q]PF-1-CDO-RIO.[1] In 2010, the City inadvertently rezoned the Project Site from M2-1 to its current zoning, which is not consistent with the site's land use designation under the adopted Community Plan. The "PF" zoning is associated with a land use designation of Public Facilities, which allows for the development of agricultural uses, parking under freeways, fire and police stations, government buildings, public libraries, post offices, public health facilities, and public elementary and secondary schools. Because the Project Site is not owned by a governmental agency and the PF zone is inconsistent with the Heavy Manufacturing land use designation, it would not be reasonable or appropriate to analyze the buildout of the site under the PF zone. Thus, for these reasons, this alternative evaluates the potential environmental impacts of the redevelopment of the site under the M3-1-CDO-RIO zone, which is consistent with the underlying "Heavy Manufacturing" General Plan land use designation and existing land uses that occur on site.

The M3 (Heavy Industrial Zone), corresponds to the current Heavy Manufacturing General Plan land use designation and generally allows for all land uses permitted under less restrictive M zones (including commercial office uses), with exceptions (i.e., dwelling units and/or guest rooms are not allowed the M zones). Under the M3-1 zone the maximum allowable floor area potential for the Project Site is 372,285 square feet. For purposes of addressing the potential environmental impacts of an alternative project that is consistent with this zone designation, this alternative contemplates an alternative that consists of commercial office land uses with a 1.5:1 floor are a ratio (FAR). Office uses were the selected land use as the office use is allowed under the M3 zone and would afford a greater financial return as compared to manufacturing uses (which is reflective of the underutilization of the existing industrial/warehouse/production land uses). Office uses were also determined to be more compatible with proximity to nearby residences, schools, and public open spaces than heavy manufacturing/industrial land uses. Further, an office project would create more jobs onsite than heavy industrial uses.

[1] *City of Los Angeles Department of City Planning, Cypress Park & Glassell Park [Q] Conditions CPC-2008-3991-ZC, 2009.*

As shown in Table V.D-1, Commercial Office Alternative, below, this alternative would include 372,285 square feet of floor area. The "CDO" designation that indicates that the Project Site is located within the Cypress Park and Glassell Park CDO District, and the "RIO" designation, which indicates that the Project Site is located within the River Improvement Overlay District, would also apply under this alternative.

**Table V.D-1**
**Commercial Office Alternative**

| Land Use | Developed Floor Area (sf) |
|---|---|
| Commercial Office | **372,285** |

A summary table describing the attributes and characteristics of the Commercial Office Alternative is provided in Table V.D-2, Summary of the Commercial Office Alternative Program.

**Table V.D-2**
**Summary of the Commercial Office Alternative Program**

| Project Characteristics | Required/Allowed By Code | Commercial Office Alternative |
|---|---|---|
| Project Site Lot Area | -- | 248,190 (5.7 acres) |
| Proposed Floor Area | 372,285 [a] | 372,285 square feet |
| General Plan Land Use Designation | Heavy Manufacturing | Heavy Manufacturing |
| Zoning | [Q]PF-1-CDO-RIO | M3-1-CDO-RIO |
| Floor Area Ratio (FAR) | 1.5 : 1 | 1.5 : 1 |
| Maximum Building Height | unlimited | 85 feet |
| Vehicle Parking Spaces | 745 stalls | 745 stalls |
| Bicycle Parking Spaces | 74 spaces | 74 spaces |

[a] *Based on a allowable FAR of 1.5:1 and a total lot area of 248,190 square feet.*
[b] *The Project Site is located within an Enterprise Zone, which requires a minimum of 1 space / 500 sf for all commercial uses.*

## a) Architectural Features

Architectural materials for the proposed buildings under this alternative would be similar to the architectural style and materials of the proposed Project, however the balconies and open space areas would be removed and/or redesigned to accommodate general open space and circulation areas suitable for an office environment.

## b) Signage and Lighting

Similar to the proposed Project the Commercial Office Alternative would provide site identification and tenant signage for the manufacturing and warehouse land uses and way-finding signage in accordance with the regulations of the LAMC. Interior spaces to the site, including exterior walkways, accessways, open space areas, and fire lanes would be illuminated with low-level and directional lighting futures to provide for safe and secure pedestrian lighting environment. Lighting and illumination would conform to the illumination standards of the LAMC. Lighting fixtures would be designed and installed to ensure the direct light source cannot be seen from adjacent residential properties and/or the public right-of-way.

## c) Vehicle Parking

The Commercial Office Alternative would provide approximately 745 parking spaces, all located within a multi-story parking structure. A summary of the proposed Project's required and proposed parking spaces are provided in Table V.D-3, below. Similar to the proposed Project, it is anticipated that the parking structure would be approximately seven (7) stories above grade and a maximum height of 81 feet.

**Table V.D-3**
**Summary of Required and Proposed Vehicle Parking Spaces**

| Description | Quantity | Parking Required by Code [a] | | Parking Provided |
|---|---|---|---|---|
| | | Rate | Spaces | |
| Commercial Office | 372,285 sf | 1 space / 500 sf | 745 | 745 |
| | | **TOTAL** | **745** | 745 |

[a] *The Project Site is located within an Enterprise Zone, which requires a minimum of 1 space / 500 sf for all commercial uses.*

## d) Bicycle Parking

The Commercial Office Alternative would provide bicycle parking in accordance with the City's Bicycle Ordinance. As summarized in Table V.D-4, Summary of Required and Proposed Bicycle Parking Spaces, below, the Commercial Office Alternative would be required to provide 111 bicycle spaces, which includes 74 long-term bicycle spaces and 37 short-term bicycle spaces. Bicycle parking spaces would be provided on the first level of the proposed parking structure and in outdoor bike parking areas.

**Table V.D-4**
**Summary of Required and Proposed Bicycle Parking Spaces**

| Description | Quantity | Bicycle Parking Requirements [a] | | Total Spaces Required | Parking Provided |
|---|---|---|---|---|---|
| | | Short Term | Long Term | | |
| *Commercial* | | | | | |
| Commercial Office | 372,285 sf | 37 | 74 | 111 | 111 |

[a] *Bicycle parking requirements pursuant to LAMC Table 12.21 A.16.(a)(2).*

## e) Floor Area Ratio (FAR) and Setbacks

The Project Site includes a total of 248,190 gross square feet of lot area. The Project Site is located in Height District No. 1, which limits development to an FAR of 1.5:1 but has no restriction on building height. As such, the Commercial Office Alternative would include 372,285 square feet of commercial office uses. Additionally, the Commercial Office Alternative would require no setbacks pursuant to the LAMC.

## f) Construction and Scheduling

As with the proposed Project, all construction activities under the Commercial Office Alternative would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Project would comply with these restrictions.

Due to the Project's location at the terminus of Casitas Avenue, construction activities are not anticipated to require any lane closures on local streets. Site deliveries and the staging of all equipment and materials shall be organized on-site in the most efficient manner possible to avoid and minimize any temporary impacts upon the surrounding neighborhood. Construction equipment shall be staged on-site for the duration of construction activities.

The Commercial Office Alternative would involve the same general construction activities and an incrementally shorter construction schedule as proposed under the proposed Project due to the decreased floor area. Similar to the proposed Project, this alternative would include the demolition of approximately 117,000 square feet of the existing building

and the removal of the asphalt paved parking lot (3,000 cubic yards of asphalt) on the Project Site. The grading/excavation phase would also be the same as the proposed Project, as excavations up to approximately 15 feet deep would be required for earthwork removal and recompaction. Like the proposed Project, the Commercial Office Alternative would require approximately 6,900 cubic yards of soil would be hauled off-site in order to ensure a proper base for the building foundations. The proposed Haul Route and number of haul trips would be the same under this Alternative as proposed under the proposed Project.

### g) Entitlement Requests

The Commercial Office Alternative would seek the following entitlements:

1) Pursuant to LAMC Section 12.32.Q, a Vesting **Zone Change and Height District Change** from [Q]PF-1-CDO-RIO to M3-1-CDO-RIO;

2) Pursuant to LAMC Section 16.05.C.1(b), **Site Plan Review** for the development of 372,285 square feet of commercial uses; and

3) Pursuant to LAMC Section 13.08, a **Director's Determination** (DIR), for compliance with the Cypress Park and Glassell Park Community Design Overlay;

Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the proposed Project, including demolition permits, haul route approval, grading and associated building permits. On-site Parking would be provided pursuant to LAMC Section 12.22.A.25(d)1.

## 4. Environmental Analysis

### a) Aesthetics

As there are no views of scenic vistas available through, or scenic resources on, the Project site, the Commercial Office Alternative's impacts with respect to these issues would be the same as under the proposed Project and also less than significant.

Because the Commercial Office Alternative would construct 115,578 square feet less floor area, the development of this Alternative could be accomplished by reducing the height of each commercial building by one story as compared to the proposed Project. Similar to the proposed Project, parking would be provided in the seven-story parking structure (Building G). Additionally, development of the Commercial Office Alternative would also improve views of the Project Site from public views and from the pedestrian paths that run along the south side and north side of the River compared to existing conditions. With

regards to views, the Commercial Office Alternative would result in a less than significant impact. From an urban massing standpoint, the Commercial Office Alternative would have a similar impact when compared to the proposed Project.

As the Commercial Office Alternative would have similar lighting and building materials as the proposed Project, this alternative would have similar light and glare impacts under the Commercial Office Alternative would be the same as identified under the proposed Project. Similar to the proposed Project, the Commercial Office Alternative would comply with Section 99.05.106.8, Light Pollution Reduction, of the City of Los Angeles Green Building Code (Ord. 182,849) to ensure that lighting impacts would be reduced. With regards to nighttime lighting and daytime glare, the Commercial Office Alternative would result in a less than significant impact, similar to the proposed Project.

## b) Air Quality

### (1) Construction

As the Commercial Office Alternative would use the same construction equipment on a daily basis as the proposed Project, daily construction emissions under this alternative would be the same as the proposed Project. However, as the construction schedule would have an incrementally shorter duration than the proposed Project, the Commercial Office Alternative would generate less total construction emissions compared to the proposed Project, since this alternative would include 115,578 square feet less floor area. Therefore, the air quality impacts of the Commercial Office Alternative would be considered less than the Project's less than significant impacts.

### (2) Operation

The proposed Project would include a total of 419 dwelling units and 64,000 square feet of ground floor commercial uses. The Commercial Office Alternative includes a total of 372,285 square feet of office space. As discussed in further detail below, under the traffic impacts discussion, the Commercial Office Alternative would generate 910 more daily trips than the proposed Project. As such, this alternative's traffic volumes and associated mobile source emissions would be increased as compared to the proposed Project. However, the Commercial Office Alternative would generate less operational ROG and CO emissions compared to the proposed Project, but would increase NOx, SOx, $PM_{10}$, and $PM_{2.5}$ emissions. The operational emissions of the Office Alternative are summarized in Table IV.D-5, below. As shown in Table V.D-5, similar to the proposed Project, the Commercial Office Alternative would not violate any air quality standards and would be

**Table V.D-5**
**Office Alternative Estimated Daily Operational Emissions**

| Emissions Source | Emissions in Pounds per Day | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
| **Summertime (Smog Season) Emissions** | | | | | | |
| Area Source | 8.46 | <0.01 | 0.11 | <0.01 | <0.01 | <0.01 |
| Energy | 0.11 | 1.04 | 0.87 | <0.01 | 0.08 | 0.08 |
| Mobile (Vehicles) | 5.09 | 23.88 | 66.45 | 0.27 | 23.90 | 6.52 |
| ***Total Project Emissions*** | ***13.66*** | ***24.92*** | ***67.43*** | ***0.27*** | ***23.98*** | ***6.60*** |
| *Less Existing Emissions* | *-4.02* | *-7.20* | *-20.67* | *-0.06* | *-4.26* | *-1.22* |
| **Net Project Emissions** | **9.64** | **17.72** | **46.76** | **0.21** | **19.72** | **5.38** |
| **SCAQMD Thresholds** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potentially Significant** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Wintertime (Non-Smog Season) Emissions** | | | | | | |
| Area Source | 8.46 | <0.01 | 0.11 | <0.01 | <0.01 | <0.01 |
| Energy | 0.11 | 1.04 | 0.87 | <0.01 | 0.08 | 0.08 |
| Mobile (Vehicle) Sources | 5.38 | 23.44 | 71.20 | 0.28 | 23.90 | 6.52 |
| ***Total Project Emissions*** | ***13.95*** | ***24.48*** | ***72.18*** | ***0.28*** | ***23.98*** | ***6.60*** |
| *Less Existing Emissions* | *-3.97* | *-7.42* | *-19.27* | *-0.05* | *-4.26* | *-1.22* |
| **Net Project Emissions** | **9.98** | **17.06** | **52.91** | **0.23** | **19.72** | **5.38** |
| **SCAQMD Thresholds** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potentially Significant** | **No** | **No** | **No** | **No** | **No** | **No** |

*Note: Calculation worksheets are provided in Appendix N to this Draft EIR.*
*Source: Parker Environmental Consultants, 2017.*

required to implement all required SCAQMD rules and regulations. Compared to the proposed Project, the Commercial Office Alternative would have a similar less than significant impact, and would have increased air quality emission impacts.

## c) Geology and Soils

### (1) Geologic and Seismic Hazards

A significant impact may occur if a project would place a new structure or building in an area that is susceptible to geological hazards or unstable soils. As discussed in the Geotechnical Investigation for the Project Site, seismic hazards relating to surface rupture, liquefaction, lateral spreading, landsliding, subsidence, and collapse are considered low risk issues on the Project Site. The primary seismic hazard for the Project Site is the potential for strong ground motion. The Project Site is susceptible to ground motion and shaking as a result of potential movement along faults in the region. The Project Site is located in a seismically active region, as is all of Southern California. These geologic hazards are common and ubiquitous throughout Southern California. The

Commercial Office Alternative would be designed and constructed in conformance with the most recently adopted California Building Code and Los Angeles Building Code design parameters, which are specifically tailored to minimize the risk of structure failure due to seismic hazards. Further, the design and construction of the Commercial Office Alternative would be subject to the review and approval of the Department of Building and Safety. Like the proposed Project, the Commercial Office Alternative would be required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter and Project's Geotechnical Investigation and the requirements outlined in the latest edition of the City of Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the LAMC, as discussed in Section IV.C, Geology and Soils. This alternative would have a less than significant impact with respect to seismic hazards. When compared to the proposed Project, the Office Alternative would have similar impacts with respect to potential seismic hazards.

Similar to the proposed Project, the Commercial Office Alternative's construction impacts on soil erosion, sedimentation, and stormwater management would be less than significant with compliance to the requirements outlined in the Chapter IX, Division 70 of the City's Uniform Building Code; the LID Ordinance 183,833; and the Standard Urban Stormwater Mitigation Plan (SUSMP), as stated in Section IV.C, Geology and Soils. The Office Alternative would be required to implement the soil erosion control measures and LID Ordinance to control soil erosion and sedimentation. Impacts would be similar to the proposed Project, and the Office Alternative would also result in a less than significant impact related to erosion and sedimentation impacts.

### (2) Paleontological Resources

The proposed Project would result in a less than significant impact upon paleontological resources, as the Project Site has been subject to past ground disturbing activities and, based on a records search by the Natural History Museum of Los Angeles County - Vertebrate Paleontology Department, no known paleontological resources have been recorded within the Project Site. The Commercial Office Alternative would require similar construction activities as the proposed Project. Therefore, the Commercial Office Alternative would have similar impacts to the proposed Project and would also result in a less than significant impact upon paleontological resources.

## d) Greenhouse Gas Emissions

### (1) Construction

The Commercial Office Alternative would have the same general construction activities and an incrementally reduced construction schedule. However, the Commercial Office Alternative would generate incrementally less greenhouse gas emissions during construction compared to the proposed Project, since this alternative includes 115,578 square feet less floor area in the overall gross building area. Similar to the proposed Project, the Commercial Office Alternative would result in a less than significant impact, but overall construction GHG emissions would be reduced compared to the proposed Project.

### (2) Operation

Similar to the proposed Project, operation of the Commercial Office Alternative would generate air pollution emissions from stationary sources and mobile sources and contribute to increased greenhouse gas emissions compared to the existing operations on-site. The proposed Project would include a total of 419 dwelling units and 64,000 square feet of ground floor commercial uses. By comparison, the Commercial Office Alternative includes 372,285 square feet of office space. The Commercial Office Alternative would comply with the same energy efficiency requirements of the L.A. Green Building Code, as applicable for a commercial project. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. With respect to operational GHG emissions from mobile sources, the Office Alternative would result in 910 more daily trips compared to the proposed Project. Thus, the operational GHG emissions associated with vehicles traveling to and from the Project Site during the operation of the Office Alternative would increase, as compared to the proposed Project.

As discussed in Section IV.D, Greenhouse Gas Emissions, the proposed Project's annual generation of GHG emissions is estimated to be 4,269.40 $CO_2e$ MTY. As shown in Table V.D-6, below, the Commercial Office Alternative's estimated annual operational GHG emissions is 6,237.93 $CO_2e$MTY, which is approximately 45 percent more than the proposed Project's GHG emissions. Compared to the proposed Project, the Commercial Office Alternative would have increased impacts relating to greenhouse gas emissions but would still result in a similarly less than significant impact.

**Table V.D-6**
**Commercial Office Alternative**
**Operational Greenhouse Gas Emissions**

| Emissions Source | $CO_2e$ Emissions (Metric Tons per |
|---|---|
| Area | 0.03 |
| Electricity | 3,673.57 |
| Natural Gas | 208.04 |
| Mobile | 3,443.05 |
| Waste | 87.06 |
| Water | 657.90 |
| ***Total Office Alternative:*** | ***8,069.65*** |
| *Less Existing Project Site:* | *-1,831.72* |
| **NET Office Alternative Emissions:** | **6,237.93** |
| *Calculation data and results provided in Appendix N to this Draft EIR.* | |

## e) Hazardous Materials and Risk of Upset

As described in Section IV.E, Hazardous Materials/Risk of Upset, the Project Site is identified on the following databases: FINDS, CA HAZNET, CA EMI, RCRA-LQG, US AIRS, and EDR US Historical Auto Station. The Project Site addresses were also identified in the EDR database report related to the former Taylor Yard facility of which the Project Site was a part. As such, the proposed Project would implement Project Design Feature HAZ-PDF-1, which requires the preparation and implementation of a Soil Management Plan to address potential hazardous substances and/or petroleum products that may be encountered during construction. However, the PDF under Commercial Office Alternative would be implemented to meet acceptable soil standards for a commercial office use instead of residential standards. The Office Alternative would require similar construction activities as the proposed Project. As with the proposed Project, the Office Alternative's adherence to applicable regulatory compliance measures and implementation of HAZ-PDF-1 would reduce any potential hazardous impacts during the construction phase to less than significant levels.

Additionally, the Los Feliz Charter School for the Arts (located less than 250 feet northeast of the Project Site) would be considered a sensitive receptor regarding hazardous materials exposure. Similar to the proposed Project, implementation of HAZ-PDF-1 would ensure that the Office Alternative would have a less than significant impact upon the nearby school.

## f) Land Use and Planning

The Commercial Office Alternative would seek a Vesting Zone Change from [Q]PF-1-CDO-RIO to M3-1-CDO-RIO; approval of Site Plan Review for the development of 372,285 square feet of commercial uses; and a Waiver or Modification of Development Standard to use lot area as buildable area. With approval of the requests, the Commercial Office Alternative would be in conformance with applicable provisions of the LAMC and General Plan. The Commercial Office Alternative would also not conflict with local and regional plans applicable to the Project Site. Land use impacts would be less than significant under this alternative. Therefore, the Commercial Office Alternative would generate similar land use impacts to the proposed Project's less than significant impacts.

## g) Noise

### (1) Construction

As discussed in Section IV.G, Noise, the construction-related noise and groundborne vibration impacts associated with the proposed Project would be less than significant. The day-to-day noise levels during active construction periods are anticipated to be the same as the proposed Project under the Commercial Office Alternative. The same construction code compliance requirements identified in Section IV.G, Noise, would also be applicable to this alternative. Thus, construction noise and vibration impacts under the Commercial Office Alternative would have similar impacts as compared to the proposed Project's less than significant impacts, however, because the duration of construction would be shorter under this alternative, construction noise impacts would be reduced.

### (2) Operation

The operational noise generated under the Commercial Office Alternative would be typical of office land uses. The Commercial Office Alternative's noise levels associated with outdoor noise sources, on-site mechanical equipment, and noise generated within the parking garage would be less than significant, similar to the proposed Project. With respect to roadway noise levels, the Commercial Office Alternative would result in 910 more trips per day. Therefore, the Commercial Office Alternative is also anticipated to generate significant roadway noise impacts at two roadway segments: 1) Larga Avenue, between Fletcher Drive and Carillon Street: and 2) La Clede Avenue, between Fletcher Drive and Carillon Street (see Appendix O to this Draft EIR). The mitigation measure regarding traffic management (Mitigation Measure TRANS-MM-3) would also be applicable to this alternative. Thus, operational noise impacts from roadway noise would be significant and unavoidable under the Office Alternative and greater than the proposed Project.

## h) Population and Housing

As discussed in Section IV.H, Population and Housing, the proposed Project would be consistent with the Northeast Los Angeles Community Plan and the SCAG 2016-2040 RTP/SCS growth projections with respect to population and housing. The Commercial Office Alternative would include 372,285 square feet of office space and no residential uses. The proposed Project would provide a net decrease of approximately 64 jobs, compared to existing on-site activities. Table V.D-7, below, shows that the Commercial Office Alternative would generate a net increase of 1,429 employees. The Commercial Office Alternative would be consistent with the SCAG 2016-2040 RTP/SCS employment growth projections.

The Commercial Office Alternative would not provide the Project's beneficial impact of creating new housing, and the net new permanent employment increase of 1,429 could induce population growth, although since the employment estimates are within the SCAG 2016-2040 RTP/SCS employment growth projections, the impact would be considered less than significant. Thus, the housing and population impacts under the Commercial Office Alternative would be less than significant but greater than under the proposed Project.

**Table V.D-7**
**Estimated Employee Generation from Office Alternative**

| Land Use | Quantity Proposed | Employment Generation Rates [a] | Total Employees |
|---|---|---|---|
| **Existing Conditions** | | | |
| Manufacturing Space | 87,000 sf | 1 employee / 535 sf | 163 |
| Warehouse | 25,000 sf | 1 employee / 781 sf | 32 |
| Production Space | 5,000 sf | 1 employee / 535 sf | 9 |
| | | **Total Current Employees** | 204 |
| **Office Alternative** | | | |
| Office | 372,285 sf | 1 employee / 228 sf | 1,633 |
| | | **Total Office Alternative Employees** | **1,633** |
| | | *Less Existing Employees* | *-204* |
| | | **NET New Employees** | **1,429** |

*Notes:*
[a] *Employment rates based on U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*
*Source: Parker Environmental Consultants, 2019.*

## i) Public Services

The Commercial Office Alternative would generate a net on-site population increase of 1,429 persons, whom would generally only occupy the site during daytime business hours. The proposed Project was found to have a less than significant impact on fire

protection services, schools, parks, and libraries. Similar to the proposed Project, the Commercial Office Alternative would also implement Project Design Features POL-PDF-1 through POL-PDF-3 to address public safety impacts and reduce impacts upon police services to less than significant levels. With the implementation of the proposed PDFs, this alternative would result in a less than significant impact to police protection services. It is anticipated that the Commercial Office Alternative would create similar but reduced demands on fire protection services, police protection services, schools, parks, and libraries, since this alternative proposes no residential dwelling units. Like the proposed Project, the Commercial Office Alternative would have less than significant impacts on fire protection services, police protection services, schools, parks, and libraries.

## j) Utilities and Service Systems

### (1) Water

Impacts associated with local water conveyance and infrastructure upgrades are anticipated to be similar under the Commercial Office Alternative as compared to the proposed Project and would be less than significant. Under the proposed Project, the anticipated water demand is expected to result in a net increase of 85,023 gallons per day or approximately 95 acre-feet of water per year. Comparatively, as shown in Table V.D-8, below, the net water demand associated with the Commercial Office Alternative would be approximately 43,842 gpd or 49 acre feet per year, which is roughly 48 percent less than the proposed Project's water demand.

As discussed in Section IV.J-1, Water, the 2015 UWMP has evaluated the City's water supply in comparison to SCAG's regional growth projections and has determined that the City has adequate capacity to serve the anticipated growth in the region, which includes the proposed Project. Because this alternative would demand less water than the proposed Project, the projected demands associated with this alternative can be accommodated by the City's water supply. Therefore, similar to the proposed Project, the Commercial Office Alternative would result in less than significant impacts. Compared to the proposed Project, impacts regarding future water demands would be reduced under this alternative.

**Table V.D-8**
**Estimated Water Demand by the Office Alternative**

| Type of Use | Quantity Unit | Water Use (gpd/unit) [a] | Proposed Water Demand (gpd) | (AFY) |
|---|---|---|---|---|
| **Existing Uses** | | | | |
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 | |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 | |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 | |
| Landscaping | 7,150 sf | (MAWA)[b] | 335 | |
| | | **Existing Water Demand:** | **9,767** | **11** |
| **Office Alternative** | | | | |
| Office | 372,285 sf | 0.144 gpd/sf | 53,609 | |
| | | **Total Office Alternative Water Demand:** | **53,609** | **60** |
| | | *Minus Existing Demand:* | *- 9,767* | *- 11* |
| | | **Net Additional Water Demand:** | **43,842** | **49** |

*Notes: sf: square feet, gpd: gallons per day; AFY: acre feet per year*
*All numbers rounded to the nearest gpd or AFY.*
[a] *Based on sewer generation rates provided in the City's L.A. Sanitation, Wastewater Engineering Services Division correspondence letter, dated April 20, 2017 (See Appendix B to this DEIR).*
[b] *Water demand for existing landscaped areas was based on approximately 7,150 sf of existing landscaped area and the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (MAWA)(LA Green Building Code Sec. 99.04.304).*
*Source: Parker Environmental Consultants, 2019.*

### (2) Wastewater

As concluded in Section IV.J-2, Wastewater, the existing local wastewater infrastructure would be expected to adequately serve the proposed Project and the anticipated wastewater flows would be less than significant and within the treatment capacity of the Hyperion Water Reclamation Plant. Under the proposed Project, the anticipated wastewater generation is expected to result in a net increase of 84,633 gpd. Comparatively, as shown in Table V.D-9, below, the net wastewater generation associated with the Commercial Office Alternative would be approximately 35,242 gpd, or roughly 58 percent less than the proposed Project's wastewater generation. With respect to anticipated wastewater generation, the Office Alternative would result in a decrease in wastewater generation. As the projected demands associated with the Commercial Office Alternative are less than the proposed Project, the same conclusion can be reached that this alternative can be adequately accommodated by the City's wastewater infrastructure and treatment facilities without any significant impact to the environment. Similar to the proposed Project, the Commercial Office Alternative would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. Compared to the proposed Project, impacts regarding future wastewater generation would be reduced under this alternative.

**Table V.D-9**
**Estimated Wastewater Generation by Office Alternative**

| Type of Use | Size | Wastewater Demand Rate (gpd/unit) [a] | Total Wastewater Demand (gpd) |
|---|---|---|---|
| **Existing Uses** | | | |
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 |
| **Existing Wastewater Generation:** | | | **9,432** |
| **Office Alternative** | | | |
| Office | 372,285 sf | 0.12 gpd/sf | 44,674 |
| **Total Office Alternative Wastewater Generation:** | | | **44,674** |
| *Less Existing Wastewater Generation:* | | | *-9,432* |
| **NET TOTAL Wastewater Generation:** | | | **35,242** |

*Notes: sf =square feet; du = dwelling units, gpd: gallons per day*
*[a] Based on correspondence with the City of Los Angeles Bureau of Sanitation (dated April 20, 2017). Contained in Appendix B to this DEIR.*
*Parker Environmental Consultants, 2019.*

### (3) Solid Waste

#### *(a) Construction*

Similar to the proposed Project, the Commercial Office Alternative would comply with all federal, state and local statutes and regulations related to solid waste and impacts would be less than significant. The proposed Project's demolition and construction activities are estimated to generate approximately 10,658 tons of debris. Comparatively, as shown in Table V.D-10, below, the Commercial Office Alternative would generate 10,523 tons of construction and demolition debris, which equates to roughly a one percent decrease in the solid waste material as compared to the proposed Project. Similar to the proposed Project, all construction and demolition debris generated by the Commercial Office Alternative would be delivered to a Certified Construction and Demolition Waste Processing Facility. Similar to the conclusion regarding the proposed Project, the amount of solid waste generated during construction of the Commercial Office Alternative would fall well within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be similar to the proposed Project and less than significant.

**Table V.D-10**
**Estimated C&D Debris by the Commercial Office Alternative**

| Construction Activity | Size | Rate (lbs./sf) [a b] | Generated Waste (tons) |
|---|---|---|---|
| ***Demolition*** | | | |
| Industrial Building | 117,000 sf | 155 lbs/sf | 9,068 |
| **Total Demolition Debris Generation:** | | | **9,068** |
| ***Construction*** | | | |
| Commercial | 372,285 sf | 4.34 lbs/sf | 808 |
| Parking Garage | 298,000 sf | 4.34 lbs/sf | 647 |
| **Total Construction Debris Generation:** | | | **1,455** |
| **Office Alternative NET TOTAL:** | | | **10,523** |

*Notes: sf = square feet; lbs = pounds*
[a] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[b] *United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003.*
*Source: Parker Environmental Consultants, 2017.*

*(b) Operation*

Similar to the proposed Project, operation of the Commercial Office Alternative would cause on-going generation of solid waste throughout the lifespan of this alternative. As discussed in Section IV.J-3, Solid Waste, the proposed Project would generate approximately 3,883 pounds (1.94 tons) of solid waste per day, or approximately 709 tons per year. Comparatively, as shown in Table V.D-11 below, the Commercial Office Alternative would generate approximately 278 lbs/day of solid waste or approximately 51 tons per year. Operational solid waste under the Commercial Office Alternative would be approximately 93 percent less solid waste generated by the proposed Project. Therefore, similar to the proposed Project, solid waste impacts under the Commercial Office Alternative would be less than significant. Compared to the proposed Project, the operational solid waste impacts would be significantly reduced under the Commercial Office Alternative.

**Table V.D-11**
**Estimated Operational Solid Waste Generation by Commercial Office Alternative**

| Type of Use | Size | Solid Waste Generation Rate [a] (lbs/unit/day) | Total Solid Waste Generated (lbs/day) |
|---|---|---|---|
| **Existing Uses** | | | |
| Industrial (117,000 sf) | 219 emp [b] | 8.93 lbs/emp/day | 1,956 |
| | | ***Subtotal Existing Solid Waste Generation:*** | ***1,956*** |
| **Office Alternative** | | | |
| Office | 372,285 sf | 0.006 lbs/sf/day | 2,234 |
| | | *Less Existing Uses:* | *-1,956* |
| | | **NET TOTAL Solid Waste Generation:** | **278** |

*Notes: sf =square feet; du = dwelling units; emp = employee*
[a] *Generation rates from L.A. CEQA Thresholds Guide, page M.3-2. This estimate is conservative since waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were projected based on 1 employee per 535 square feet of manufacturing business. Source: U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*
*Source: Parker Environmental Consultants, 2017.*

### (4) Electric Power, Natural Gas, and Telecommunications Infrastructure

#### *(a) Electric Power*

Under the proposed Project, the total estimated electricity use from construction activities would be 5,915 kilowatt-hours (kWh), which is less than the demand generated by the existing uses. The proposed Project would be able to connect to and would be served by the existing power grid serving the Project Site. Similar to the proposed Project, construction of the Commercial Office Alternative would be serviced by the existing infrastructure serving the Project Site. Energy demands associated with construction equipment would require less power than existing land uses in operation at the Project Site. Thus, similar to the proposed Project, construction impacts upon electric power infrastructure would be less than significant.

The proposed Project's net increase in operational electricity use is estimated to be approximately 1,337,720 kWh/year (see Table IV.O-5, in Section IV, O, Energy). By comparison, the estimated net increase in electricity demand by the Commercial Office Alternative is estimated to be approximately 5,283,560 kWh/year (see Table V.D-12, under the Energy subheading below). Similar to the proposed Project, establishing electric power service to the Commercial Office Alternative would involve disconnecting existing power connections and establishing new connections to serve the proposed structures. Such improvements would be localized in nature and would include service

connections to overhead power poles and/or existing underground transformers. Thus, the Commercial Office Alternative would result in similar less than significant impacts upon electric infrastructure.

*(b) Natural Gas*

The proposed Project's net natural gas demands are estimated to be approximately 3,372,230 kbtu/year, or approximately 275,509 cf/month. As shown in Table V.D-13, under the Energy subheading below, the estimated net increase in natural gas demands by the Commercial Office Alternative would be approximately 143,610 cf/month, which is roughly 52 percent of the net natural gas demand of the proposed Project. Similar to the proposed Project, it is not anticipated that any new natural gas distribution infrastructure or facilities would be constructed or expanded as a result of the Commercial Office Alternative. Both the proposed Project and the Commercial Office Alternative would require local infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts associated with utility connections would be temporary in nature, and thus would result in less than significant impacts upon the environment. Therefore, impacts associated with natural gas infrastructure under this alternative would result in similar less than significant impacts upon natural gas infrastructure.

## k) Traffic/Transportation

### (1) Plan Consistency

The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Similar to the proposed Project, the Commercial Office Alternative would provide pedestrian and bicycle connectivity through the Project Site to the adjacent future Bowtie Park parcel. As such, the Commercial Office Alternative would have similar less than significant impacts with respect to not conflicting with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

### (2) VMT Analysis

Under the Commercial Office Alternative, no residential units are proposed. Therefore, this alternative would not result in any Household VMT/Capita impacts. For the Work VMT/Capita threshold, the Commercial Office Alternative would result in a Work VMT/Capita of 14.9 miles per worker, which is above the 12.7 Work VMT/Capita threshold. The proposed Project's Work VMT/Capita is also 14.9.

With mitigation, the Project's Work VMT/Capita would be reduced to 14.2 miles per worker. The Commercial Office Alternative would employ similar VMT-related mitigation measures as proposed for the Project with respect to education/encouragement, bicycle infrastructure, and neighborhood enhancement. With Mitigation, the Work VMT/Capita would be reduced to 14.0 miles per worker. However, impacts would still remain significant and increased as compared to the proposed Project for the Work VMT/Capita threshold. As such, this alternative would not be effective in reducing the Project's VMT impacts.

## l) Cultural Resources

### (1) Historical Resources

Under the proposed Project, no known historical resources would be impacted from the construction of the proposed Project. The Commercial Office Alternative would require similar construction activities as the proposed Project. Therefore, the Commercial Office Alternative would have a similar conclusion compared to the proposed Project and would result in a less than significant impact upon historic resources.

### (2) Archaeological Resources

As discussed in Section IV.L, Cultural Resources, the proposed Project would result in a less than significant impact upon archaeological resources since the Project Site has been subject to past ground disturbing activities and, based on cultural resources records search conducted by the South Central Coastal Information Center (SCCIC), no known archaeological resources have been recorded within the Project Site. Nevertheless, the proposed Project would implement Mitigation Measures CUL-MM-1 through CUL-MM-3, which would reduce Project impacts on archaeological resources to a less than significant level if any archaeological resources are found during the construction phase. It is anticipated that the Commercial Office Alternative would create similar impacts to archaeological resources, since the construction activities would be similar to the proposed Project. The Commercial Office Alternative would also implement the same cultural mitigation measures recommended under the proposed Project. When compared to the proposed Project, this alternative would result in a similar conclusion and would have a less than significant impact to archaeological resources with mitigation.

## m) Biological Resources

The Project Site consists of active commercial businesses and associated plantings of ornamental vegetation. No natural or semi-natural vegetation communities are present on the Project Site; plants present are non-native consisting of ornamental non-native trees and shrubs of several species. No wetland habitat was observed on-site. The

Commercial Office Alternative would require similar construction activities and would include the operation of 372,285 square feet of new office space. The demolition of the existing conditions for the operation of the Commercial Office Alternative would not destroy any biological resources. Thus, impacts upon biological resources would be similar to the proposed Project and less than significant under the Commercial Office Alternative.

## n) Tribal Cultural Resources

As discussed in Section IV.N, Tribal Cultural Resources, there is no evidence of any known tribal cultural resources to be recorded on the Project Site. Considering the information available on Native American settlement patterns for the Glendale Narrows, historical disturbances, and soil data for the Project Site, SWCA concluded the Project Site was found to have a low sensitivity for containing unidentified tribal cultural resources. With incorporation of a one-day spot-check field consultation by the Gabrieleño Band of Mission Indians (see TCR-PDF-1), impacts upon inadvertent finds of tribal cultural resources would be less than significant.

The Commercial Office Alternative would involve the same levels of earthwork and grading activity as the proposed Project. As such, this alternative would incorporation the same project design feature (TCR-PDF-1) to ensure impacts associated with inadvertent fonds are reduced to less than significant levels. Similar to the proposed Project, the Commercial Office Alternative would result in less than significant impacts upon Tribal Cultural Resources.

## o) Energy

### *(a) Electricity*

Construction of the proposed Project would consume approximately 209,392 gallons of transportation fuel, including approximately 78,675 gallons of diesel and 130,717 gallons of gasoline. Additionally, the total estimated electricity use from construction activities is 25,915 kilowatt-hours (kWh). Energy use under the Commercial Office Alternative would be reduced as compared to the proposed Project as a smaller building would be constructed. However, both the proposed Project and the Commercial Office Alternative would be subject to the same energy conservation requirements as described in Section IV,O Energy. As such, construction impacts related to energy conservation would be less than significant but further reduced under this alternative as there would be less building construction.

As discussed in Section IV.O, Energy, the estimated net increase in electricity consumption by the proposed Project would be approximately 1,337,720 kilowatt hours

per year (kWh/year). As shown in Table V.D-12, below, the estimated net increase in electricity consumption by the Commercial Office Alternative would be approximately 5,283,560 kWh/year, which is roughly 395 percent more than the proposed Project. Although the Commercial Office Alternative would comply with energy conservation features imposed under Title 24 and the L.A. Green Building Code, this alternative would be more impactful in terms of energy demand. Energy conservation impacts under the Commercial Office Alternative would be less than significant but increased as compared to the proposed Project.

**Table V.D-12**
**Estimated Electricity Demand by the Commercial Office Alternative**

| Land Use | Size | Total Electricity Demand (kWh/year)[a] |
|---|---|---|
| **Existing Uses** | | |
| General Light Industrial | 117,000 sf | 1,298,700 |
| **Existing Electricity Demand:** | | **1,298,700** |
| **Commercial Office Alternative Uses** | | |
| Office | 372,285 sf | 4,835,980 |
| Enclosed Parking Structure | 745 spaces | 1,746,280 |
| **Total Commercial Office Alternative Electricity** | | **6,582,260** |
| *Less Existing Electricity Demand:* | | *-1,298,700* |
| **NET TOTAL Electricity Demand:** | | **5,283,560** |

*Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour*
*[a] California Emissions Estimator Model (CalEEMod)v.2016.3.2, Existing Conditions Annual Emissions Worksheets See Appendix N, Project Alternatives AQ and GHG Modeling Worksheets).*
*Source: Parker Environmental Consultants, 2019.*

*(b) Natural Gas*

The proposed Project's net natural gas demands are estimated to be approximately 3,372,230 kbtu/year, or approximately 275,509 cf/month. As shown in Table V.D-13, below, the estimated net increase in natural gas demands by the Commercial Office Alternative would be approximately 143,610 cf/month, which is roughly 52 percent less than the natural gas demand of the proposed Project. Similar to the proposed Project, the Commercial Office Alternative would promote energy conservation in accordance with the policies identified in Title 24 and the L.A. Green Building Code. Implementation of regulatory compliance measures that meet Title 24 and L.A. Green Building Code energy efficiency requirements would further reduce demand for natural gas. Thus, energy conservation impacts associated with natural gas use would be similarly less than significant but reduced under this alternative.

**Table V.D-13**
**Estimated Natural Gas Demand By the Commercial Office Alternative**

| Land Use | Size | Natural Gas Demand Rate (kBtu/year) [a] | Total Natural Gas Demand (cf/month) [b] |
|---|---|---|---|
| **Existing Uses** | | | |
| General Light Industry | 117,000 sf | 2,117,700 | 173,015 |
| **Total Existing Natural Gas Demand:** | | **2,117,700** | **173,015** |
| **Commercial Office Alternative** | | | |
| *Office* | | 3,875,490 | 316,625 |
| *Parking Structure* | | 0 | 0 |
| **Commercial Office Alternative Natural Gas Demand** | | **3,875,490** | ***316,625*** |
| *Less Existing Natural Gas Demand [b]:* | | -2,117,700 | *-173,015* |
| **NET TOTAL Natural Gas Demand:** | | **1,757,790** | **143,610** |

*Notes: sf =square feet; du = dwelling unit*
[a] *California Emissions Estimator Model (CalEEMod) v.2016.3.2, Proposed Project Annual Emissions Worksheets See Appendix N, Project Alternatives AQ and GHG Modeling Worksheets).*
[b] *1 cubic feet (cf) of natural gas = 1.02 kBtu.*
*Source: Parker Environmental Consultants, 2019.*

*(c) Transportation Energy*

With respect to transportation energy, under the proposed Project, the proposed land uses are estimated to generate an annual demand of 283,101 gallons of gasoline and 75,211 gallons of diesel on an annual basis. The Commercial Office Alternative would generate an annual demand of 304,624 gallons of gasoline and approximately 77,458 gallons of diesel fuel, representing an increase in fuel use by approximately 8 percent for gasoline and 3 percent for diesel fuel. As such, impacts associated with transportation fuel demand would be less than significant but increased under this alternative.

# 5. Relationship of the Commercial Office Alternative to the Project Objectives

Under the Commercial Office Alternative, only general office use would be proposed on-site. Therefore, the Commercial Office Alternative would meet a portion of the Project objectives listed above and in Section II, Project Description. Specifically, the Commercial Office Alternative would not meet the following objectives:

- Achieve greater land use compatibility by replacing existing light industrial uses with uses more compatible with nearby existing and proposed recreational, residential, and school uses, as well as the Los Angeles River.

- Address the City's critical housing needs by providing a significant amount of housing, including Very Low Income housing units, in a range of housing types and sizes at a location that does not displace existing housing.

- Develop additional housing stock at an infill location that is close to commercial and recreational amenities, employment opportunities, and schools.

- Provide a mixed-use project with on-site amenities.

- Provide restaurant and similar amenities within walking distance of the residential neighborhoods on the other side of SR-2, future park users, and the Los Angeles River.

- Support a growing demand for ecologically sensitive urban farming operations through the provision of an urban farm.

The Commercial Office Alternative would provide 372,285 square feet of commercial office space. Therefore, this Alternative would not achieve greater land use compatibility between uses on the Project Site and nearby existing and proposed recreational, residential, and school uses. Additionally, the Commercial Office Alternative would not provide housing, restaurant uses, or support the demand for ecologically sensitive urban farm operations.

This Alternative would provide jobs in the area and would enhance the visual appearance and character of the Project Site. The Commercial Office Alternative would also be constructed to meet CalGreen buildings standards and the City's Green Building Code standards. Although this Alternative would meet some of the Project Objectives, the Commercial Office Alternative would not meet the overall purpose of the proposed Project.

# V. Alternatives

# E. Residential Alternative

## 1. Description of the Residential Alternative

The Residential Alternative is essentially a scaled down version of the proposed Project without the 64,000 square feet of commercial space. Similar to the proposed Project, the Residential Alternative would include the demolition of the existing 117,000 square-foot warehouse/production building and the construction of a residential development 419 dwelling units. Similar to the proposed Project, this alternative would require a General Plan Amendment to change the land use designation from Heavy Manufacturing to Limited Industrial and a Vesting Zone Change from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO. Pursuant to LAMC Section 12.17.1.A.1, residential land uses are permitted in a CM Zone with compliance to the density regulations of the R3 Zone. As such, residential uses on the Project Site would be limited to one dwelling unit per 800 square feet (or approximately 310 dwelling units for the Project Site based on a lot area of 248,190 square feet). Similar to the proposed Project, the Residential Alternative would request a 35% increase in density for the provision of affordable housing on-site, and would therefore provide a total of 419 multi-family residential units, totaling approximately 423,872 square feet of floor area. 35 dwelling units would be restricted to Very-Low Income Units (i.e., 11 percent of the base density).

A five-story parking garage (Building G), adjacent to Building A, would provide up to 587 parking spaces for the Project Site. As compared to the proposed Project, the Residential Alternative parking garage would be five stories instead of seven. In addition, open space and recreational amenities would comprise approximately 58,176 square feet. A summary of the Project with the proposed unit mix and floor area is provided in Table V.E-1, Residential Alternative Land Use Summary.

### a) Residential Uses

The proposed Project would provide a total of 419 multi-family residential units. The proposed residential units would include a combination of 119 studio units, 220 one-bedroom units, and 80 two-bedroom units as summarized in Table V.E-1, below.

**Table V.E-1**
**Residential Alternative Land Use Summary**

| Land Uses | Dwelling Units | Floor Area (Square Feet) |
|---|---|---|
| ***Residential*** | | |
| Studio Units | 119 du | -- |
| One-Bedroom Units | 220 du | -- |
| Two-Bedroom Units | 80 du | -- |
| **TOTAL** | **419 du** | **423,872 sf [a]** |

*Notes: du = dwelling unit; sf = square feet*
[a] *Includes residential amenity space.*

A summary table describing the attributes and characteristics of the Residential Alternative is provided in Table V.E-2, Summary of the Residential Alternative Program.

**Table V.E-2**
**Summary of Residential Alternative Program**

| Project Characteristics | Required/Allowed By Code | Residential Alternative |
|---|---|---|
| Project Site Lot Area | -- | 248,190 (5.7 acres) |
| Proposed Floor Area | 502,584 [a] | 423,872 square feet |
| General Plan Land Use Designation | Heavy Manufacturing | Limited Industrial |
| Zoning | [Q]PF-1-CDO-RIO | CM-1-CDO-RIO |
| Floor Area Ratio (FAR) | 2.03 : 1 [b] | 1.71 : 1 |
| Maximum Building Height | unlimited | 71 feet |
| Open Space | 43,900 square feet | 58,176 square feet |
| Vehicle Parking Spaces | 499 stalls | up to 587 stalls [c] |
| Bicycle Parking Spaces | 461 spaces | 461 spaces |

[a] *Based on a allowable FAR of 1.5:1 and a total lot area of 248,190 square feet and 35% Density Bonus incentive.*
[b] *The 2.03:1 FAR is allowed due to 35% Density Bonus Incentive.*
[c] *Based on an average 1.4 parking spaces per dwelling unit to meet anticipated demand.*

## b) Architectural Features

Architectural materials for the proposed buildings under this alternative would be similar to the proposed Project and would include medium grain finish plaster (stucco), concrete fiberboard panel siding, aluminum frame casement windows, aluminum frame sliding doors, aluminum storefront glazing, roll up sectional garage door, glass, painted steel guardrail and design features, and cast-in-place concrete.

The Residential Alternative would have the same general site plan layout and building design as proposed under the proposed Project, but at a reduced scale. Because this alternative would exclude the 64,000 square feet of commercial space, the development of this alternative could be accomplished by reducing the height of each building by one story and reducing the parking structure by two stories.

## c) Open Space Recreational Amenities

The Residential Alternative would include 58,176 square feet of open space. The open space requirements and amount of open space proposed for this alternative are summarized in Table V.E-3 below. As shown, the Residential Alternative exceeds the required amount of open space by approximately 14,276 square feet.

Similar to the proposed Project, the Residential Alternative would feature a variety of trees, shrubs, vines, and perennials. Proposed landscaping would also feature a variety of ornamental streetscape and common area landscaping. Like the proposed Project, this alternative would include communal patio, pool deck, lounge seating, outdoor barbeque, amenity deck, and community room space. Pursuant to the minimum tree requirements specified in LAMC Section 12.21G.2 (i.e., 1 tree per every 4 dwelling units), this alternative requires a minimum of 78 trees. The Residential Alternative would include 140 trees. Similar to the proposed Project, the landscaping features would be provided at grade, on the porch levels and on the upper deck on balconies (private balconies), and in the common open space areas.

**Table V.E-3**
**Required and Proposed Open Space Calculations**

| **Open Space Code Requirements** | | | |
|---|---|---|---|
| **Type** | **Number of Units** | **Square Feet Required [a]** | **Total Square Feet Required** |
| Less than three habitable rooms (studio units and 1-bedroom units) | 339 | 100 sf / du | 33,900 |
| Three habitable rooms (2-bedroom) | 80 | 125 sf / du | 10,000 |
| | | **TOTAL** | **43,900** |
| **Open Space / Landscaping Features** | | | **Area Proposed (Square Feet)** |
| Ground Level | | | 35,478 |
| Porch Level | | | 18,888 |
| Second Level | | | 3,810 |
| **TOTAL OPEN SPACE PROPOSED** | | | **58,176** |

[a] *LAMC Section 12.21.G.2*

## d) Signage and Lighting

Similar to the proposed Project, the Residential Alternative would provide site identification and tenant signage for the commercial land uses and way-finding signage in accordance with the regulations of the LAMC. Interior spaces to the site, including exterior walkways, accessways, open space areas, and fire lanes would be illuminated with low-level and directional lighting fixtures to provide for safe and secure pedestrian lighting environment. Lighting and illumination would conform to the illumination standards of the LAMC. Lighting fixtures would be designed and installed to ensure the direct light source cannot be seen from adjacent residential properties and/or the public right-of-way.

## e) Vehicle Parking

The Residential Alternative would provide up to 587 parking spaces, all located within the proposed parking structure (Building G), which includes residential designated parking spaces. With 499 parking spaces required, the Residential Alternative would provide 88 more spaces than the minimum spaces required by the LAMC. The proposed parking inventory would provide 1.4 spaces per dwelling unit to meet the proposed Project's anticipated parking demand. A summary of the Residential Alternative's required and proposed parking spaces are provided in Table V.E-4, below. Because the Residential Alternative would require over 128 fewer parking spaces than proposed under the proposed Project, it is anticipated that this alternative would provide one less parking level. Additionally, because this alternative does not propose the urban farm, the parking structure would provide two stories less than the proposed Project, with a maximum of five stories.

**Table V.E-4**
**Summary of Required and Proposed Vehicle Parking Spaces**

| Description | Quantity | Parking Required by Code [a] | | Parking Provided |
|---|---|---|---|---|
| | | Rate | Spaces | |
| ***Residential*** | | | | |
| Less than three habitable rooms (studio and 1-bedroom units) | 339 du | 1 space / du | 339 | 587 [b] |
| More than three habitable rooms (2-bedroom units) | 80 du | 2 spaces / du | 160 | |
| | | **TOTAL** | **499** | **587** |

*Notes: du = dwelling unit, sf = square feet*
[a] *Per LAMC Section 12.21.A.4.*
[b] *Similar to the proposed Project, this Alternative would provide residential parking at a ratio of 1.4 spaces per dwelling unit.*

## f) Bicycle Parking

The Residential Alternative would provide bicycle parking in accordance with the City's Bicycle Ordinance. As summarized in Table V.E-5, Summary of Required and Proposed Bicycle Parking Spaces, below, the Residential Alternative would be required to provide 202 bicycle spaces, which includes 180 long-term bicycle spaces and 22 short-term bicycle spaces. Bicycle parking spaces would be provided on the first level of the proposed parking structure (Building G) and in outdoor bicycle parking areas.

**Table V.E-5**
**Summary of Required and Proposed Bicycle Parking Spaces**

| Description | Quantity | Bicycle Parking Requirements [a] | | Total Spaces Required | Parking Provided |
|---|---|---|---|---|---|
| | | Short Term | Long Term | | |
| Dwelling Units 1-25 | 25 | 2 | 25 | 27 | 202 |
| Dwelling Units 26-100 | 75 | 5 | 50 | 55 | |
| Dwelling Units 101-200 | 100 | 10 | 50 | 60 | |
| Dwelling Units 201+ | 219 | 5 | 55 | 60 | |
| **TOTAL** | 419 du | 22 | 180 | 202 | |

*Notes: du = dwelling unit, sf = square feet*
[b] *Bicycle parking requirements pursuant to LAMC Section 12.21 A.16.*

## g) Floor Area Ratio (FAR) and Setbacks

The Project Site includes a total of 248,190 gross square feet of lot area. The Project Site is located in Height District No. 1, which limits development to an FAR of 1.5:1 but has no restriction on building height. Pursuant to the LAMC Section 12.2.1, the Project Site has an allowed floor area ratio (FAR) of 1.5 to 1. Since the Residential Alternative would reserve 35 dwelling units (i.e., 11 percent of the base residential density of 310 units) as Very Low-Income housing units, this alternative would also be eligible for a base FAR increase of 35 percent. As such, the Residential Alternative would be allowed a maximum floor area of 502,584 square feet. The Residential Alternative would consist of approximately 423,872 square feet of total floor area (approximately 1.71:1 FAR).

The Residential Alternative would also include five buildings. Building A would include a maximum of five stories. Buildings B, C, and D would include a maximum of four stories. The Parking Garage (Building G) would include five stories.

Similar to the proposed Project, the Residential Alternative would provide a minimum 10' – 1" side yard setback from Building G along the northerly property line, a minimum 14' –

2” front yard setback from the easterly property line fronting Building A, a minimum 37’ – 1” side yard setback from the easterly property line adjacent to Building B, and a minimum 30’ – 2” rear yard setback from the southerly property line adjacent to Buildings C and D.

## h) Construction and Scheduling

As with the proposed Project, all construction activities under the Residential Alternative would be performed in accordance with all applicable state and federal laws, and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Project would comply with these restrictions.

Due to the Project’s location at the terminus of Casitas Avenue, construction activities are not anticipated to require any lane closures on local streets. Site deliveries and the staging of all equipment and materials shall be organized on-site in the most efficient manner possible to avoid and minimize any temporary impacts upon the surrounding neighborhood. Construction equipment shall be staged on-site for the duration of construction activities.

The Residential Alternative would involve the same general construction activities as the proposed Project on a daily basis, but given its reduced square footage, the overall duration of construction would be incrementally shorter. Similar to the proposed Project, the Residential Alternative would include the demolition of approximately 117,000 square feet of the existing building and the removal of the asphalt paved parking lot (3,000 cubic yards of asphalt) on the Project Site. The grading/excavation phase for the Residential Alternative would also be the same as the proposed Project, as excavations up to approximately 15 feet deep would be required for earthwork removal and recompaction. Like the proposed Project, the Residential Alternative would require approximately 6,900 cubic yards of soil to be hauled off-site in order to ensure a proper base for the building foundations. The proposed Haul Route and number of haul trips would be the same under this Alternative as proposed under the proposed Project.

## i) Entitlement Requests

The Residential Alternative would seek the same general discretionary actions as required under the proposed Project. Accordingly, the entitlement requests under the Residential Alternative would include the following:

1) Pursuant to LAMC Section 11.5.6, a **General Plan Amendment** to the Northeast Los

Angeles Community Plan to change the land use designation from Heavy Manufacturing to Limited Industrial;

2) Pursuant to LAMC Section 12.32.Q, a Vesting **Zone Change and Height District Change** from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO;

3) Pursuant to LAMC Section 16.05.C.1(b), **Site Plan Review** for the development of 419 residential units;

4) Pursuant to California Government Code Section 65915(f)(3) and LAMC Section 12.22.A.25, a **Density Bonus Compliance Review** for the Project providing 11 percent of the total units (excluding density bonus units) as Very Low-Income Units to permit a mixed-use development with the following development incentives and waivers:

    a. Density Bonus to allow a 35 percent increase in the permitted density to allow 419 units in lieu of the 310 units otherwise permitted in the CM zone;

    b. One on-menu incentive to allow a maximum 35 percent increase in Floor Area Ratio (FAR); and

    c. One off-menu waiver to use the lot area of the site as the buildable area for calculating floor area;

5) Pursuant to LAMC Section 17.15, a **Vesting Tentative Tract Map** for the subdivision of one lot into one ground lot and 17 airspace lots; and

6) Pursuant to LAMC Section 13.08, a Director's Determination (DIR), for compliance with the Cypress Park and Glassell Park Community Design Overlay

Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the proposed Project, including demolition permits, haul route approval, grading and associated building permits. On-site Parking would be provided pursuant to LAMC Section 12.22.A.25(d)1.

# 6. Environmental Analysis

## a) Aesthetics

As there are no views of scenic vistas available through, or scenic resources on, the Project site, the Residential Alternative's impacts with respect to these issues would be the same as under the proposed Project and also less than significant.

Because the Residential Alternative would reduce the building by approximately 64,000 square feet, the development of this alternative could be accomplished by reducing the height of each multi-family building. Similar to the proposed Project, parking would be provided in a multi-level parking structure, but would be fewer levels than the proposed Project since this alternative does not propose an urban farm and requires less parking spaces. Like the proposed Project, the Residential Alternative would be designed and landscaped in accordance with the Cypress Park and Glassell Park Community Design Overlay Design Guidelines (CDO Design Guidelines) and the RIO Design Guidelines. Also like the proposed Project, development of the Residential Alternative would improve views of the Project Site from public views and from the pedestrian paths that run along the south side and north side of the River as compared to existing conditions. However, the Residential Alternative would have less massing and a reduced height as compared to the proposed Project. Therefore, the visual character impacts of this alternative would be less than the proposed Project's less than significant impact.

As the Residential Alternative would have similar lighting and building materials as the proposed Project, this alternative would have similar light and glare impacts as the proposed Project. Similar to the proposed Project, the Residential Alternative would comply with Section 99.05.106.8, Light Pollution Reduction, of the City of Los Angeles Green Building Code (Ord. 182849) to ensure that lighting impacts would be reduced. With regards to nighttime lighting and daytime glare, the Residential Alternative would result in a less than significant impact, similar to the proposed Project.

## b) Air Quality

### (1) Construction

As the Reduced Density Alternative would use the same construction equipment on a daily basis as the proposed Project, daily construction emissions under this alternative would be the same as the proposed Project. However, as the construction schedule would have an incrementally shorter duration than the proposed Project, the Residential Alternative would overall generate less total construction emissions compared to the proposed Project. Therefore, the air quality impacts of the Residential Alternative would be considered less than the proposed Project's less than significant impacts.

### (2) Operation

The proposed Project would include a total of 419 dwelling units and 64,000 square feet of ground floor commercial uses. By comparison, the Residential Alternative would only include the 419 dwelling units. Table V.E-6, below, shows the estimated daily operational emissions from the Residential Alternative.

**Table V.E-6**
**Residential Alternative Estimated Daily Operational Emissions**

| Emissions Source | Emissions in Pounds per Day | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
| **Summertime (Smog Season) Emissions** | | | | | | |
| Area Source | 10.25 | 0.40 | 34.63 | <0.01 | 0.19 | 0.19 |
| Energy | 0.14 | 1.16 | 0.49 | <0.01 | 0.09 | 0.09 |
| Mobile (Vehicles) | 3.51 | 15.38 | 47.74 | 0.19 | 16.16 | 4.41 |
| ***Total Project Emissions*** | ***13.90*** | ***16.94*** | ***82.86*** | ***0.19*** | ***16.44*** | ***4.69*** |
| *Less Existing Emissions* | *-4.02* | *-7.20* | *-20.67* | *-0.06* | *-4.26* | *-1.22* |
| **Net Project Emissions** | **9.88** | **9.74** | **62.19** | **0.13** | **12.18** | **3.47** |
| **SCAQMD Thresholds** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potentially Significant** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Wintertime (Non-Smog Season) Emissions** | | | | | | |
| Area Source | 10.25 | 0.40 | 34.63 | <0.01 | 0.19 | 0.19 |
| Energy | 0.14 | 1.16 | 0.49 | <0.01 | 0.09 | 0.09 |
| Mobile (Vehicle) Sources | 3.33 | 15.69 | 44.45 | 0.18 | 16.16 | 4.41 |
| ***Total Project Emissions*** | ***13.72*** | ***17.25*** | ***79.57*** | ***0.18*** | ***16.44*** | ***4.69*** |
| *Less Existing Emissions* | *-3.97* | *-7.42* | *-19.27* | *-0.05* | *-4.26* | *-1.22* |
| **Net Project Emissions** | **9.75** | **9.83** | **60.30** | **0.13** | **12.18** | **3.47** |
| **SCAQMD Thresholds** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potentially Significant** | **No** | **No** | **No** | **No** | **No** | **No** |

*Note: Calculation worksheets are provided in Appendix N to this Draft EIR.*
*Source: Parker Environmental Consultants, 2017.*

The Residential Alternative would generate less operational emissions compared to the proposed Project, since this alternative would not include the 64,000 square feet of commercial space. As discussed in further detail below, under the traffic impacts discussion, the Residential Alternative would generate 344 fewer daily trips than the proposed Project. As such, this alternative's traffic volumes and associated mobile source emissions would be reduced as compared to the proposed Project. Similar to the proposed Project, the Residential Alternative would not violate any air quality standards and would be required to implement all required SCAQMD rules and regulations. Compared to the proposed Project, the Residential Alternative would have a similar less than significant impact, and would have reduced air quality emission impacts.

## c) Geology and Soils

### (1) Geology/Seismic Hazards

As discussed in the Geotechnical Investigation for the Project Site, seismic hazards relating to surface rupture, liquefaction, lateral spreading, landsliding, subsidence, and collapse are considered low risk issues on the Project Site. The primary seismic hazard

for the Project Site is the potential for strong ground motion. The Project Site is susceptible to ground motion and shaking as a result of potential movement along faults in the region. The Project Site is located in a seismically active region, as is all of Southern California. These geologic hazards are common and ubiquitous throughout Southern California. The Residential Alternative would be designed and constructed in conformance with the most recently adopted California Building Code and Los Angeles Building Code design parameters, which are specifically tailored to minimize the risk of structure failure due to seismic hazards. Further, the design and construction of the Residential Alternative would be subject to the review and approval of the Department of Building and Safety. Like the proposed Project, the Residential Alternative would be required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter and Project's Geotechnical Investigation and the requirements outlined in the latest edition of the City of Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the LAMC, as discussed in Section IV.C, Geology and Soils. This alternative would have a less than significant impact with respect to seismic hazards. When compared to the proposed Project, the Residential Alternative would have similar and essentially equivalent impacts upon potential seismic hazards.

Similar to the proposed Project, the Residential Alternative's construction impacts on soil erosion, sedimentation, and stormwater management would be less than significant with compliance to the requirements outlined in the Chapter IX, Division 70 of the City's Uniform Building Code; the LID Ordinance 183,833; and the Standard Urban Stormwater Mitigation Plan (SUSMP), as stated in Section IV.C, Geology and Soils. The Residential Alternative would be required to implement the soil erosion control measures and LID Ordinance to control soil erosion and sedimentation. Impacts would be similar to the proposed Project, and the Residential Alternative would also result in a less than significant impact related to erosion and sedimentation impacts.

### (2) Paleontological Resources

The proposed Project would result in a less than significant impact upon paleontological resources, as the Project Site has been subject to past ground disturbing activities and, based on a records search by the Natural History Museum of Los Angeles County - Vertebrate Paleontology Department, no known paleontological resources have been recorded within the Project Site. The Residential Alternative would require similar construction activities as the proposed Project. Therefore, the Residential Alternative would have a similar impacts to the proposed Project and would also result in a less than significant impact upon paleontological resources.

## d) Greenhouse Gas Emissions

### (1) Construction

The Residential Alternative would have the same general construction activities on a daily basis as the proposed Project. However, the Residential Alternative would overall generate less greenhouse gas emissions during construction compared to the proposed Project, since this alternative would not include the 64,000 square feet of commercial space. Similar to the proposed Project, the Residential Alternative would result in a less than significant impact, but construction GHG emissions would be reduced compared to the proposed Project.

### (2) Operation

Similar to the proposed Project, operation of the Residential Alternative would generate air pollution emissions from stationary sources and mobile sources and contribute to increased greenhouse gas emissions compared to the existing operations on-site. The proposed Project would include a total of 419 dwelling units and 64,000 square feet of ground floor commercial uses. By comparison, the Residential Alternative would only include the 419 dwelling units. The Residential Alternative would comply with the same energy efficiency requirements of the L.A. Green Building Code, as applicable for a residential project. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. With respect to operational GHG emissions from mobile sources, the Residential Alternative would result in 344 fewer average daily trips as compared to the proposed Project. Thus, the operational GHG emissions associated with vehicles traveling to and from the Project Site during the operation of the Residential Alternative would be reduced, as compared to the proposed Project.

As discussed in Section IV.D, Greenhouse Gas Emissions, the proposed Project's annual generation of GHG emissions is estimated to be 4,269.40 $CO_2e$ MTY. As shown in Table V.E-7, below, the Residential Alternative's estimated annual GHG emissions is 3,330.34 $CO_2e$ MTY, which is approximately 23 percent less than the proposed Project's GHG emissions. Compared to the proposed Project, the Residential Alternative would have reduced impacts relating to greenhouse gas emissions. The Residential Alternative would similarly result in a less than significant impact.

**Table V.E-7**
**Residential Alternative Operational Greenhouse Gas Emissions**

| Emissions Source | $CO_2e$ Emissions (Metric Tons per Year) |
|---|---|
| Area | 7.24 |
| Electricity | 1,600.71 |
| Natural Gas | 246.92 |
| Mobile | 2,984.92 |
| Waste | 48.46 |
| Water | 273.81 |
| ***Total Residential Alternative Emissions:*** | ***5,162.06*** |
| *Less Existing Project Site:* | *-1,831.72* |
| **NET Residential Alternative Emissions:** | **3,330.34** |
| *Calculation data and results provided in Appendix N to this Draft EIR.* | |

## e) Hazardous Materials and Risk of Upset

As described in Section IV.E, Hazardous Materials/Risk of Upset, the Project Site is identified on the following databases: FINDS, CA HAZNET, CA EMI, RCRA-LQG, US AIRS, and EDR US Historical Auto Station. The Project Site addresses were also identified in the EDR database report related to the former Taylor Yard facility of which the Project Site was a part. As such, the proposed Project would implement Project Design Feature HAZ-PDF-1, which requires the preparation and implementation of a Soil Management Plan to address potential hazardous substances and/or petroleum produces that may be encountered during construction. The Residential Alternative would require similar construction activities as the proposed Project. As with the proposed Project, the Residential Alternative's adherence to applicable regulatory compliance measures and implementation of HAZ-PDF-1 would mitigate any potential hazardous impacts during the construction phase to less than significant levels.

Additionally, the Los Feliz Charter School for the Arts (located less than 250 feet northeast of the Project Site) would be considered a sensitive receptor regarding hazardous materials exposure. Like the proposed Project, implementation of HAZ-PDF-1 would ensure that the Residential Alternative would have a less than significant impact upon the nearby school.

## f) Land Use and Planning

The Residential Alternative would seek the same general discretionary actions. The Residential Alternative would still request a General Plan Amendment, Zone Change, and Height District Change. With approval of the requests, the Residential Alternative would be in conformance with applicable provisions of the LAMC and General Plan. The

Residential Alternative would also not conflict with local and regional plans applicable to the Project Site. Similar to the proposed Project, the Residential Alternative would be consistent with several effective strategies to reduce future resident's exposure to poor ambient air quality from the Glendale Freeway. Land use impacts would be less than significant under this alternative. Therefore, the Residential Alternative would result in similar land use impacts to the proposed Project's less than significant impacts.

## g) Noise

### (1) Construction

As discussed in Section IV.G, Noise, the construction-related noise and groundborne vibration impacts associated with the proposed Project would be less than significant. The day-to-day noise levels during active construction periods are anticipated to be the same as the proposed Project under the Residential Alternative. The same construction code compliance requirements identified in Section IV.G, Noise, would also be applicable to this alternative. Thus, construction noise and vibration impacts under the Residential Alternative would have similar impacts as compared to the proposed Project's less than significant impacts.

### (2) Operation

The operational noise generated under the Residential Alternative would be typical of residential land uses. The Residential Alternative's noise levels associated with outdoor noise sources, on-site mechanical equipment, and noise generated within the parking garage would be less than significant, similar to the proposed Project. With respect to roadway noise levels, the Residential Alternative would result in 344 less trips per day compared to the proposed Project. Nevertheless, the Residential Alternative is also anticipated to generate significant roadway noise impacts at two roadway segments: 1) Larga Avenue, between Fletcher Drive and Carillon Street; and 2) La Clede Avenue, between Fletcher Drive and Carillon Street, though at lower noise levels than the proposed Project (see Appendix O to this Draft EIR). The mitigation measure regarding traffic management (Mitigation Measure TRANS-MM-3) would also be applicable to this alternative. Since the Residential Alternative would result in fewer trips, the roadway noise impact would be less than the proposed Project, but operational noise impacts from roadway noise would be significant and unavoidable under the Residential Alternative, similar to the proposed Project.

## h) Population and Housing

As discussed in Section IV.H, Population and Housing, the proposed Project would be consistent with the Northeast Los Angeles Community Plan and the SCAG 2016-2040

RTP/SCS growth projections with respect to population, housing, and employment. The Residential Alternative would also include a total of 419 dwelling units. Because the Residential Alternative would provide the same number of housing units, the Residential Alternative would also be consistent with the Northeast Los Angeles Community Plan and the SCAG 2016-2040 RTP/SCS growth projections. Additionally, the Residential Alternative would not include commercial space, which would not induce additional housing demand or population growth through employment growth. When compared to the proposed Project, the Residential Alternative would have the same impact to population and housing. Impacts to population and housing under this alternative would thus be less than significant, similar to the proposed Project.

## i) Public Services

The proposed Project was found to have a less than significant impact on fire protection services, schools, parks, and libraries. With only 419 dwelling units and no proposed commercial space, the Residential Alternative would have incrementally reduced impacts with respect to fire protection services and police protection services. Similar to the proposed Project, the Residential Alternative would also implement Project Design Features POL-PDF-1 through POL-PDF-3 to increase public safety and reduce impacts upon police services. In addition, this alternative would pay school fees to the LAUSD and applicable park fees to the Department of Recreation and Parks. It is anticipated that the Residential Alternative would create slightly reduced demands on fire protection services and police protection services, and similar demands upon schools, parks, and libraries by proposing the same number of dwelling units. Like the proposed Project, impacts would be less than significant.

## j) Utilities and Service Systems

### (1) Water

Impacts associated with local water conveyance and infrastructure upgrades are anticipated to be similar under the Residential Alternative as compared to the proposed Project and would be less than significant. Under the proposed Project, the anticipated water demand is expected to result in a net increase of 85,023 gallons per day or approximately 95 acre-feet of water per year. Comparatively, as shown in Table V.E-8, below, the net water demand associated with the Residential Alternative would be approximately 75,419 gpd or 85 acre-feet per year, which is roughly 11 percent less than the proposed Project's water demand. As discussed in Section IV.J-1, Water, the 2015 UWMP has evaluated the City's water supply in comparison to SCAG's regional growth projections and has determined that the City has adequate capacity to serve the anticipated growth in the region. Similar to the proposed Project, because this alternative

would not exceed the planned growth projections for the existing General Plan and zoning density requirements of the Project Site, the projected demands associated with this alternative can be accommodated by the City's water supply. Therefore, similar to the proposed Project, the Residential Alternative would result in less than significant impacts. Compared to the proposed Project, impacts regarding future water demands would be reduced under this alternative.

**Table V.E-8**
**Estimated Water Demand by Residential Alternative**

| Type of Use | Quantity Unit | Water Use (gpd/unit) [a] | Proposed Water Demand (gpd) | (AFY) |
|---|---|---|---|---|
| **Existing Uses** | | | | |
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 | |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 | |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 | |
| Landscaping | 7,150 sf | (MAWA)[b] | 335 | |
| | | **Existing Water Demand:** | **9,767** | **11** |
| **Residential Alternative** | | | | |
| **Residential Units (419 total du)** | | | | |
| Studio | 119 du | 75 gpd/du | 8,925 | |
| One Bedroom | 220 du | 110 gpd/du | 24,200 | |
| Two-Bedroom | 80 du | 150 gpd/du | 12,000 | |
| Swimming Pool and Spa | 5,056 cu. ft. [c] | 7.78 gpd / cu. ft. | 39,336 | |
| | | **Total Residential Units Water Demand:** | ***84,461*** | ***95*** |
| Landscaping [d] | 15,486 sf | (MAWA) | 725 | **0.8** |
| | | **Total Residential Alternative Water Demand:** | ***85,186*** | ***95.8*** |
| | | *Minus Existing Demand:* | *- 9,767* | *- 11* |
| | | **Net Additional Water Demand:** | **75,419** | **85** |

*Notes: du: dwelling unit, sf: square feet, gpd: gallons per day; AFY: acre feet per year*
*All numbers rounded to the nearest gpd or AFY.*

[a] *Based on sewer generation rates provided in the City's L.A. Sanitation, Wastewater Engineering Services Division correspondence letter, dated April 20, 2017 (See Appendix B to this DEIR).*

[b] *Water demand for existing landscaped areas was based on approximately 7,150 sf of existing landscaped area and the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (MAWA)(LA Green Building Code Sec. 99.04.304).*

[c] *The estimate for swimming pools is conservative as it is based on replacing the entire volume of water on a daily basis.*

[d] *Landscaping water demand for the proposed Project was based on 15,486 square feet of landscaped open space area and the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304).*

*Source: Parker Environmental Consultants, 2019.*

### (2) Wastewater

As concluded in Section IV.J-2, Wastewater, the existing local wastewater infrastructure would be expected to adequately serve the proposed Project and the anticipated wastewater flows would be less than significant and within the treatment capacity of the Hyperion Water Reclamation Plant. Under the proposed Project, the anticipated wastewater generation is expected to result in a net increase of 84,633 gpd. Comparatively, as shown in Table V.E-9, below, the net wastewater generation associated with the Residential Alternative would be approximately 75,029 gpd, or

**Table V.E-9**
**Estimated Wastewater Generation by Residential Alternative**

| Type of Use | Size | Wastewater Demand Rate (gpd/unit) [a] | Total Wastewater Demand (gpd) |
|---|---|---|---|
| **Existing Uses** | | | |
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 |
| | | **Existing Wastewater Generation:** | **9,432** |
| **Residential Alternative** | | | |
| **Residential Units (419 total du)** | | | |
| Studio | 119 du | 75 gpd/du | 8,925 |
| One Bedroom | 220 du | 110 gpd/du | 24,200 |
| Two-Bedroom | 80 du | 150 gpd/du | 12,000 |
| Swimming Pool and Spa [b] | 5,056 cu. ft. | 7.78 gpd/cu. ft. | 39,336 |
| | | **Total Residential Alternative Wastewater Generation:** | ***84,461*** |
| | | *Less Existing Wastewater Generation:* | *-9,432* |
| | | **NET TOTAL Wastewater Generation:** | **75,029** |

*Notes: sf =square feet; du = dwelling units, gpd: gallons per day*
[a] *Based on correspondence with the City of Los Angeles Bureau of Sanitation (dated April 20, 2017). Contained in Appendix B to this DEIR.*
[b] *It is assumed that the swimming pool and spa would remain the same size as the proposed Project.*
*Parker Environmental Consultants, 2019.*

roughly 11 percent less than the proposed Project's wastewater generation. With respect to anticipated wastewater generation, the Residential Alternative would result in a decrease in wastewater generation. As the projected demands associated with the Residential Alternative are less than the proposed Project, the same conclusion can be reached that this alternative can be adequately accommodated by the City's wastewater infrastructure and treatment facilities without any significant impact to the environment.

Similar to the proposed Project, the Residential Alternative would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. Compared to the proposed Project, impacts regarding future wastewater generation would be reduced under this alternative.

### (3) Solid Waste

Similar to the proposed Project, the Residential Alternative would comply with all federal, state and local statutes and regulations related to solid waste and impacts would be less than significant. The proposed Project's demolition and construction activities are estimated to generate approximately 10,658 tons of debris. Comparatively, as shown in Table V.E-10, below, the Residential Alternative would generate 10,431 tons of construction and demolition debris, which equates to roughly 2 percent decrease in the solid waste material as compared to the proposed Project. Similar to the proposed Project, all construction and demolition debris generated by the Residential Alternative would be delivered to a Certified Construction and Demolition Waste Processing Facility. Similar to the conclusion regarding the proposed Project, the amount of solid waste generated during construction of the Residential Alternative would fall well within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be similar to the proposed Project and less than significant.

**Table V.E-10**
**Estimated Construction and Demolition Debris by the Residential Alternative**

| Construction Activity | Size | Rate (lbs./sf) [a] [b] | Generated Waste (tons) |
|---|---|---|---|
| ***Demolition*** | | | |
| Industrial Building | 117,000 sf | 155 lbs/sf | 9,068 |
| **Total Demolition Debris Generation:** | | | **9,068** |
| ***Construction*** | | | |
| Multi-Family Residential | 423,872 sf | 4.39 lbs/sf | 930 |
| Parking Garage | 199,600 sf | 4.34 lbs/sf | 433 |
| **Total Construction Debris Generation:** | | | **1,363** |
| **Residential Alternative NET TOTAL:** | | | **10,431** |

*Notes: sf = square feet; lbs = pounds*
[a] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[b] *United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003.*
*Source: Parker Environmental Consultants, 2017.*

Similar to the proposed Project, operation of the Residential Alternative would cause on-going generation of solid waste throughout the lifespan of this alternative. As discussed in Section IV.J-3, Solid Waste, the proposed Project would generate approximately 3,883 pounds (1.94 tons) of solid waste per day, or approximately 709 tons per year. Comparatively, as shown in Table V.E-11 below, the Residential Alternative would generate approximately 3,168 lbs/day of solid waste or approximately 578 tons per year. Operational solid waste under the Residential Alternative would be approximately 18 percent less solid waste generated by the proposed Project. Therefore, similar to the proposed Project, solid waste impacts under the Residential Alternative would be less than significant. Compared to the proposed Project, the operational solid waste impacts would be reduced under the Residential Alternative.

**Table V.E-11**
**Estimated Operational Solid Waste Generation by Residential Alternative**

| Type of Use | Size | Solid Waste Generation Rate [a] (lbs/unit/day) | Total Solid Waste Generated (lbs/day) |
|---|---|---|---|
| **Existing Uses** | | | |
| Industrial (117,000 sf) | 219 emp [b] | 8.93 lbs/emp/day | 1,956 |
| ***Subtotal Existing Solid Waste Generation:*** | | | ***1,956*** |
| **Residential Alternative** | | | |
| Multi-Family Residential | 419 du | 12.23 lbs/du/day | 5,124 |
| ***Total Residential Alternative Solid Waste Generation:*** | | | ***5,124*** |
| *Less Existing Uses:* | | | *-1,956* |
| **NET TOTAL Solid Waste Generation:** | | | **3,168** |

*Notes: sf =square feet; du = dwelling units; emp = employee*
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were projected based on 1 employee per 535 square feet of manufacturing business. Source: U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*
*Source: Parker Environmental Consultants, 2017.*

### (4) Electric Power, Natural Gas, and Telecommunications Infrastructure

#### *(a) Electric Power*

Under the proposed Project, the total estimated electricity use from construction activities would be 5,915 kilowatt-hours (kWh), which is less than the demand generated by the existing uses. Similar to the proposed Project, construction of the Residential Alternative would be serviced by the existing infrastructure serving the Project Site. Energy demands associated with construction equipment would require less power than existing land uses

in operation at the Project Site. Thus, similar to the proposed Project, construction impacts upon electric power infrastructure would be less than significant.

The proposed Project's net increase in operational electricity use is approximately 1,337,720 kilowatt hours per year (kWh/year). As shown in Table V.E-12, under the Energy subheading below, the estimated net increase in electricity consumption by the Residential Alternative would be approximately 399,770 kWh/year, which is roughly 70 percent less energy use than the proposed Project. The projected increase in electrical demand due to the proposed Project would not have an adverse impact on its electrical system. Energy supplies are adequate to serve the proposed Project and the installation of needed new infrastructure would not be expected to result in any significant secondary environmental effects. Similar to the proposed Project, the Residential Alternative would meet Title 24 energy efficiency requirements and further reduce demand for electricity under the Residential Alternative. Because the Residential Alternative would demand less energy than the proposed Project, impacts would be similarly less than significant and reduced as compared to the proposed Project.

*(b) Natural Gas*

The proposed Project's net natural gas demands are estimated to be approximately 3,372,230 kbtu/year, or approximately 275,509 cf/month. As shown in Table V.E-13, under the Energy subheading below, the estimated net increase in natural gas demands by the Residential Alternative would be approximately 202,790 cf/month, which is roughly 26 percent less than the natural gas demand of the proposed Project. Similar to the proposed Project, it is not anticipated that any new electricity or natural gas distribution infrastructure or facilities would be constructed or expanded as a result of the Residential Alternative. Both the proposed Project and the Residential Alternative would require local infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts associated with utility upgrades or additional connections would be temporary in nature, and thus would result in less than significant impacts upon the environment. Therefore, impacts associated with electricity and natural gas consumption under this alternative would be less than significant, similar to the proposed Project; however, electricity and natural gas demands would be reduced compared to the proposed Project.

# k) Traffic/Transportation

## (1) Plan Consistency

The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Similar to the proposed Project, the

Residential Alternative would provide pedestrian and bicycle connectivity through the Project Site to the adjacent future Bowtie Park parcel. As such, the Residential Alternative would have similar less than significant impacts with respect to not conflicting with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

### (2) VMT Analysis

Under the Residential Alternative, the vehicle miles traveled (VMT) were calculated and analyzed under the Household VMT/Capita threshold and compared to the proposed Project. Because the Residential Alternative does not include any commercial land uses, this alternative would not generate any work related VMT. For the Household VMT/Capita threshold, the Residential Alternative would result in a VMT ratio of 13.1 miles per household, which is 0.4 VMT/Capita higher than the proposed Project and also above the 7.2 Household VMT/Capita threshold.

With mitigation, the Project's Household VMT/Capita impact would be reduced to 10.5 miles per household. The Residential Alternative would employ similar VMT-related mitigation measures as proposed for the Project with respect to parking, education/encouragement, shared mobility, bicycle infrastructure, and neighborhood enhancement. With Mitigation, the Household VMT/Capita impact for this alternative would be reduced to 10.6 miles per household, which is 0.1 VMT/Capita above the proposed Project with mitigation. However, like the proposed Project, impacts would still remain significant under the Household VMT/Capita threshold. As such, this alternative would not be effective in reducing the proposed Project's Household VMT/Capita impacts.

## l) Cultural Resources

### (1) Historical Resources

The Project Site is located within the Taylor Yard Opportunity Area within the Los Angeles River corridor. Three archaeological sites have been recorded and 53 properties have been evaluated for historical significance. Seven historical buildings have been confirmed within the vicinity of the Taylor Yard Opportunity Area, none of which are located on the Project Site. Under the proposed Project, no known historical resources would be impacted from the construction of the proposed Project. The Residential Alternative would require similar construction activities as the proposed Project. Therefore, the Residential Alternative would have a similar conclusion compared to the proposed Project and would result in a less than significant impact upon historic resources.

### (2) Archaeological Resources

As discussed in Section IV.L, Cultural Resources, the proposed Project would result in a less than significant impact upon archaeological resources since the Project Site has been subject to past ground disturbing activities; and based on cultural resources records search conducted by the South Central Coastal Information Center (SCCIC), no known archaeological resources have been recorded within the Project Site. Nevertheless, the proposed Project would implement Mitigation Measures CUL-MM-1 through CUL-MM-3, which would reduce Project impacts on archaeological resources to a less than significant level if any archaeological resources are found during the construction phase. It is anticipated that the Residential Alternative would create similar impacts to archaeological resources, since the construction activities would be similar to the proposed Project. The Residential Alternative would also implement the same mitigation measures as recommended under the proposed Project. When compared to the proposed Project, this alternative would result in similar and less than significant impacts to archaeological resources with mitigation.

## m) Biological Resources

The Project Site consists of active commercial businesses and associated plantings of ornamental vegetation. No natural or semi-natural vegetation communities are present on the Project Site; plants present are non-native consisting of ornamental non-native trees and shrubs of several species. No wetland habitat was observed onsite. The Residential Alternative would be nearly identical to the proposed Project with the exception of the 64,000 square feet of commercial space. The Residential Alternative would require similar construction and operational activities as the proposed Project. The demolition of the existing conditions for the operation of the Residential Alternative would not destroy any biological resources. Thus, impacts upon biological resources would be similar to the proposed Project and less than significant under the Residential Alternative.

## n) Tribal Cultural Resources

As discussed in Section IV.N, Tribal Cultural Resources, there is no evidence of any known tribal cultural resources to be recorded on the Project Site. Considering the information available on Native American settlement patterns for the Glendale Narrows, historical disturbances, and soil data for the Project Site, SWCA concluded the Project Site was found to have a low sensitivity for containing unidentified tribal cultural resources. With incorporation of a one-day spot-check field consultation by the Gabrieleño Band of Mission Indians (see TCR-PDF-1), impacts upon inadvertent finds of tribal cultural resources would be less than significant.

The Commercial Office Alternative would involve the same levels of earthwork and grading activity as the proposed Project. As such, this alternative would incorporation the same project design feature (TCR-PDF-1) to ensure impacts associated with inadvertent fonds are reduced to less than significant levels. Similar to the proposed Project, the Commercial Office Alternative would result in less than significant impacts upon Tribal Cultural Resources.

## o) Energy

*(a) Electricity*

Construction of the proposed Project would consume approximately 209,392 gallons of transportation fuel, including approximately 78,675 gallons of diesel and 130,717 gallons of gasoline. Additionally, the total estimated electricity use from construction activities is 25,915 kilowatt-hours (kWh). Energy use under the Residential Alternative would be reduced as compared to the proposed Project as a smaller building would be constructed. However, both the proposed Project and the Residential Alternative would be subject to the same energy conservation requirements as described in Section IV,O Energy. As such, construction impacts related to energy conservation would be less than significant but further reduced under this alternative as there would be less building construction.

As discussed in Section IV.O, Energy, the estimated net increase in electricity consumption by the proposed Project would be approximately 1,337,720 kilowatt hours per year (kWh/year). As shown in Table V.E-12, below, the estimated net increase in electricity consumption by the Residential Alternative would be approximately 399,770 kWh/year, which is roughly 70 percent less than the proposed Project. Although the Residential Alternative would comply with energy conservation features imposed under Title 24 and the L.A. Green Building Code, this alternative would use less energy than the proposed Project. Energy conservation impacts under the Residential Alternative would be less than significant and reduced as compared to the proposed Project.

**Table V.E-12**
**Estimated Electricity Demand by Residential Alternative**

| Land Use | Size | Total Electricity Demand (kWh/year)[a] |
|---|---|---|
| **Existing Uses** | | |
| General Light Industrial | 117,000 sf | 1,298,700 |
| **Existing Electricity Demand:** | | **1,298,700** |
| **Residential Alternative** | | |
| Multi-Family Dwelling Units | 419 DU | 1,698,470 |
| **Total Residential Alternative Electricity Demand:** | | **1,698,470** |
| *Less Existing Electricity Demand:* | | *-1,298,700* |
| **NET TOTAL Electricity Demand:** | | **399,770** |

*Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour*
*[a] California Emissions Estimator Model (CalEEMod)v.2016.3.2, Existing Conditions Annual Emissions Worksheets See Appendix N, Project Alternatives AQ and GHG Modeling Worksheets).*
*Source: Parker Environmental Consultants, 2019.*

*(b) Natural Gas*

The proposed Project's net natural gas demands are estimated to be approximately 3,372,230 kbtu/year, or approximately 275,509 cf/month. As shown in Table V.E-13, below, the estimated net increase in natural gas demands by the Residential Alternative would be approximately 202,790 cf/month, which is roughly 26 percent less than the natural gas demand of the proposed Project. Similar to the proposed Project, the Residential Alternative would promote energy conservation in accordance with the policies identified in Title 24 and the L.A. Green Building Code. Implementation of regulatory compliance measures that meet Title 24 and L.A. Green Building Code energy efficiency requirements would further reduce demand for natural gas. Thus, energy conservation impacts associated with natural gas use would be similarly less than significant and reduced under this alternative.

**Table V.E-13**
**Estimated Natural Gas Demand By Residential Alternative**

| Land Use | Size | Natural Gas Demand Rate (kBtu/year) [a] | Total Natural Gas Demand (cf/month) [b] |
|---|---|---|---|
| **Existing Uses** | | | |
| General Light Industry | 117,000 sf | 2,117,700 | 173,015 |
| **Total Existing Natural Gas Demand:** | | **2,117,700** | **173,015** |
| **Residential Alternative** | | | |
| *Multi-Family Residential (419 DU)* | | 4,599,860 | 375,805 |
| **Residential Alternative Natural Gas Demand** | | **4,599,960** | ***375,805*** |
| *Less Existing Natural Gas Demand [b]:* | | -2,117,700 | *-173,015* |
| **NET TOTAL Natural Gas Demand:** | | **2,482,160** | **202,790** |

*Notes: sf =square feet; du = dwelling unit*
[a] *California Emissions Estimator Model (CalEEMod) v.2016.3.2, Proposed Project Annual Emissions Worksheets See Appendix N, Project Alternatives AQ and GHG Modeling Worksheets).*
[b] *1 cubic feet (cf) of natural gas = 1.02 kBtu.*
*Source: Parker Environmental Consultants, 2019.*

# 7. Relationship of the Residential Alternative to the Project Objectives

Under the Residential Alternative, only the 419 dwelling units would be proposed on-site with no commercial uses. Therefore, the Residential Alternative would meet a portion of the Project objectives listed above and in Section II, Project Description. Specifically, the Residential Alternative would not meet the following objectives:

- Provide a mixed-use project with on-site amenities.
- Provide restaurant and similar amenities within walking distance of the residential neighborhoods on the other side of SR-2, future park users, and the Los Angeles River.
- Promote fiscal benefits to the City, including economic development, job creation, and increased sales taxes.
- Support a growing demand for ecologically sensitive urban farming operations through the provision of an urban farm.

The Residential Alternative would not provide any commercial uses, which would thus not achieve the objectives related to providing commercial uses, supporting urban farming operations, and providing long-term jobs. However, this Alternative would be compatible between the uses on the Project Site and nearby existing and proposed uses. Additionally, the Residential Alternative would provide much needed housing to the area,

including affordable housing units. This would result in providing new customers for the surrounding commercial uses, specifically along Fletcher Drive and San Fernando Road. This Alternative would also be constructed to meet CalGreen buildings standards and the City's Green Building Code standards. Although this Alternative would meet some of the Project Objectives, the Residential Alternative would not meet the overall purpose of the proposed Project.

# V. Alternatives

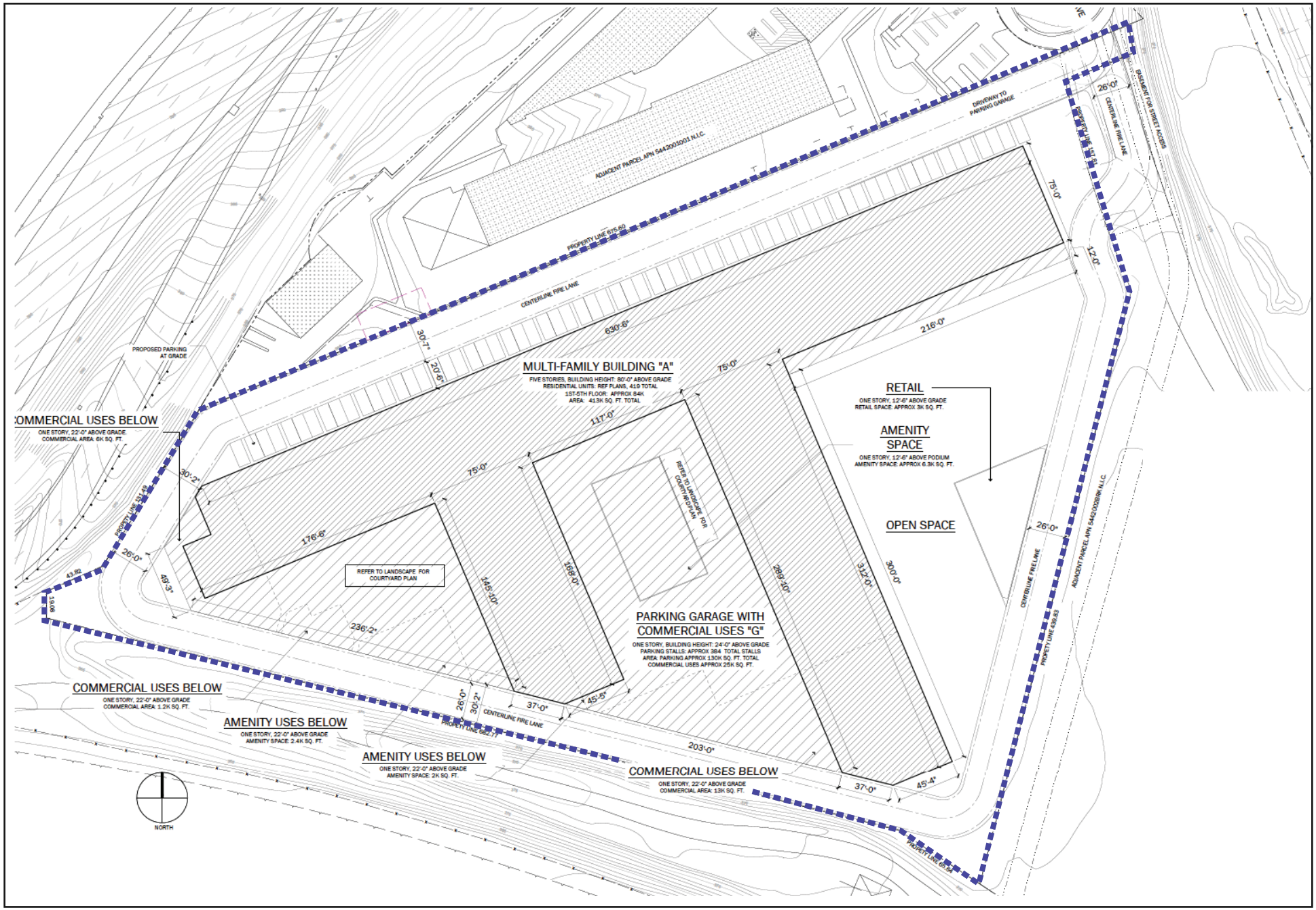
## F. Mixed-Use Podium Alternative

## 1. Description of the Mixed-Use Podium Alternative

The Mixed-Use Podium Alternative is a scaled down version of the proposed Project, except this alternative would be built without a detached parking structure and without the roof-top urban farm component. This Alternative would be constructed as one building (Building A) with residential and commercial office uses above ground floor parking and retail/restaurant uses. Parking would be provided on level one of the mixed-use building across the entire Project Site. Similar to the proposed Project, the Mixed-Use Podium Alternative would include the demolition of the existing 117,000 square-foot manufacturing/warehouse/production building and the construction of a mixed-use development with residential, commercial office, and restaurants. Pursuant to LAMC Section 12.17.1.A.1, residential land uses are permitted in a CM Zone with compliance to the density regulations of the R3 Zone. The Mixed-Use Podium Alternative would still provide a total of 419 multi-family residential units and approximately 22,000 square feet of commercial space. The restaurant and office spaces would be the same size as proposed under the proposed Project. However, this alternative would not include the urban farm under the proposed Project. As compared to the proposed Project, the Mixed-Use Podium Alternative's multi-family building would be six stories instead of seven. In addition, open space and recreational amenities would comprise approximately 58,176 square feet. A summary of the Project with the proposed unit mix and floor area is provided in Table V.F-1, Mixed-Use Podium Alternative Land Use Summary. Renderings depicting the Mixed-Use Podium Alternative Plot Plan, Floor Plans, Building Elevations, and Landscape Plan are provided in Figures V-1 through V-4, respectively.

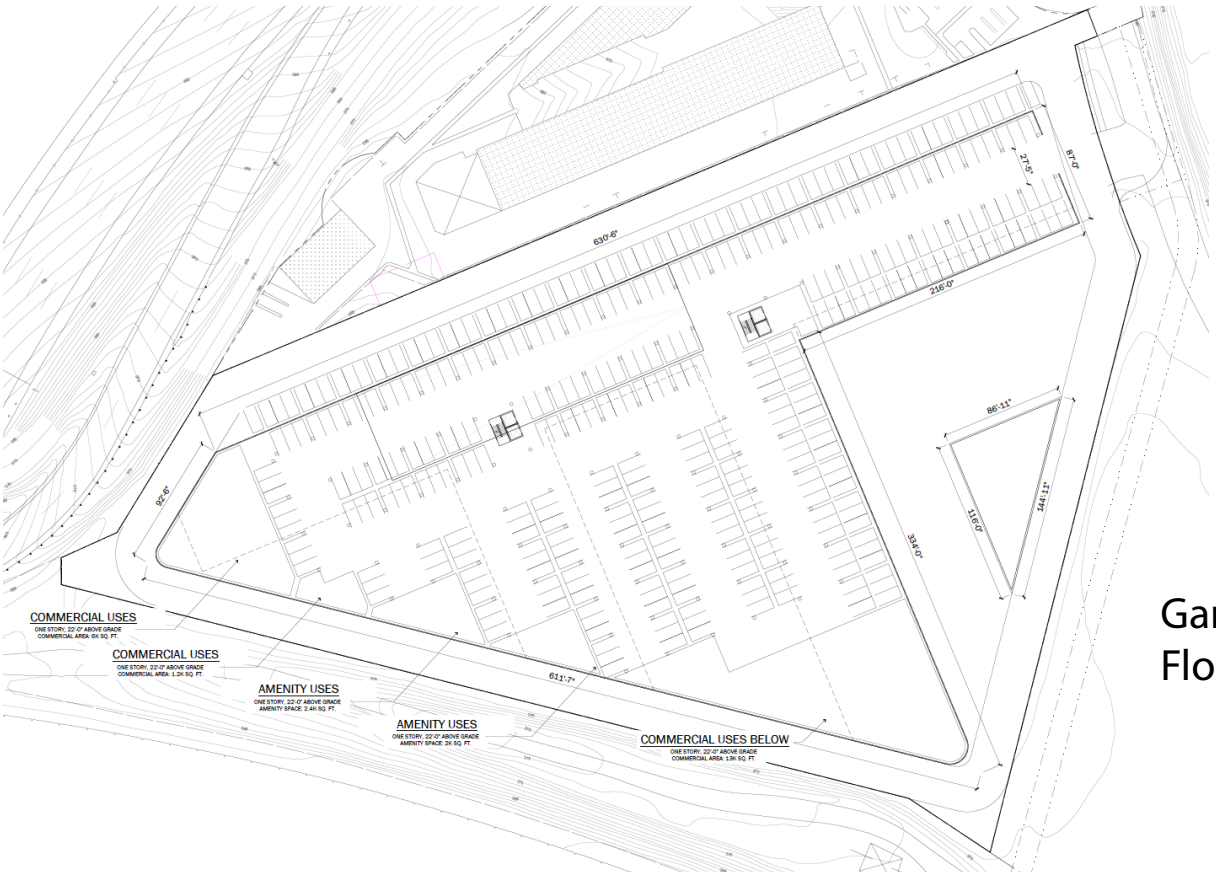
### 2. Residential Uses

The Mixed-Use Podium Alternative would provide a total of 419 multi-family residential units with 11 percent of the base-density units (35 dwelling units) would be reserved as Very Low Income units, similar to the proposed Project. The proposed residential units would include a combination of 119 studio units, 220 one-bedroom units, and 80 two-bedroom units as summarized in Table V.F-1, below.




Source: Rios Clementi Hale Studios, June 22, 2018.

Figure V-1
Mixed-Use Podium Alternative Plot Plan

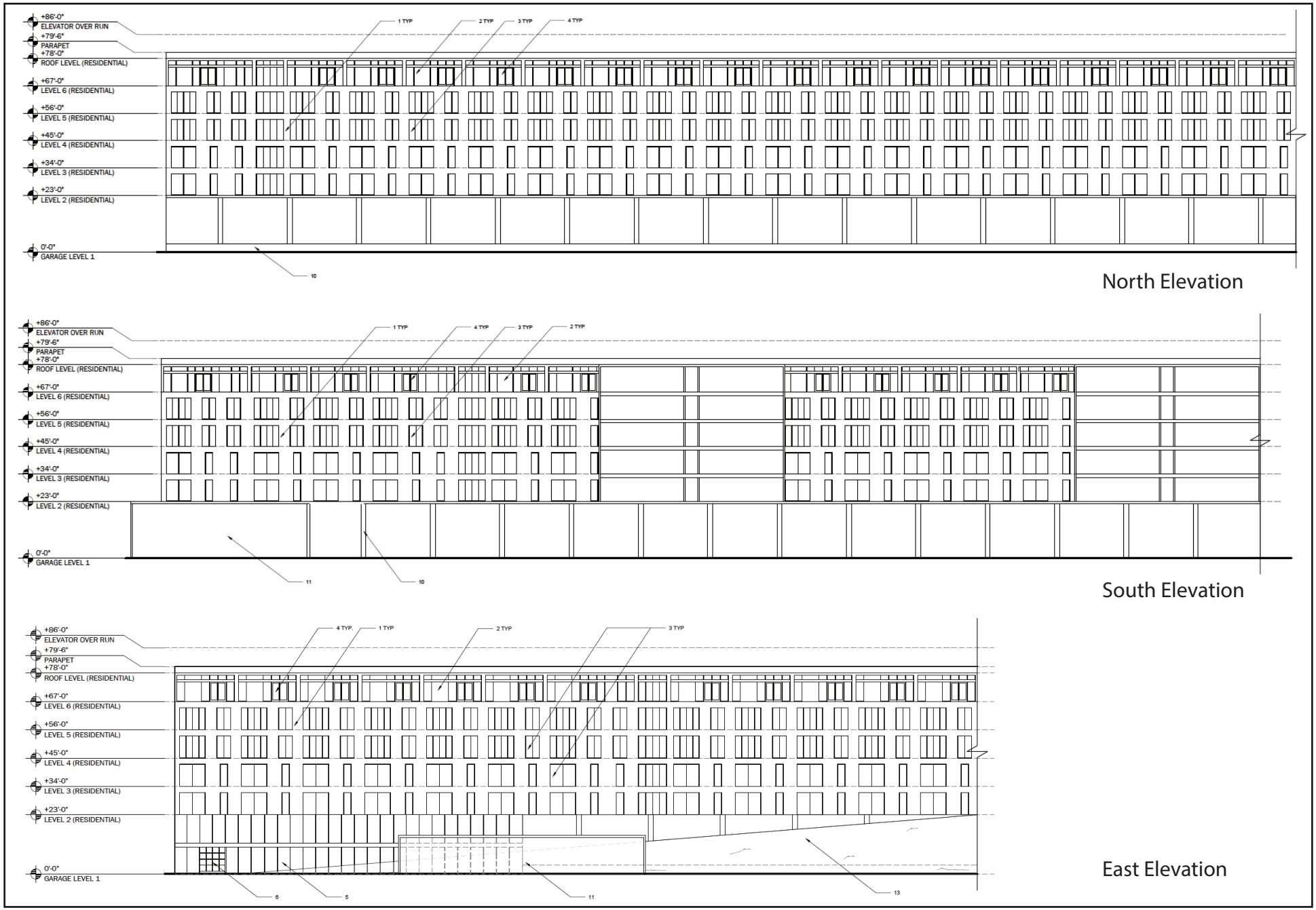



Garage
Floor Plan

Typical Building
Floor Plan

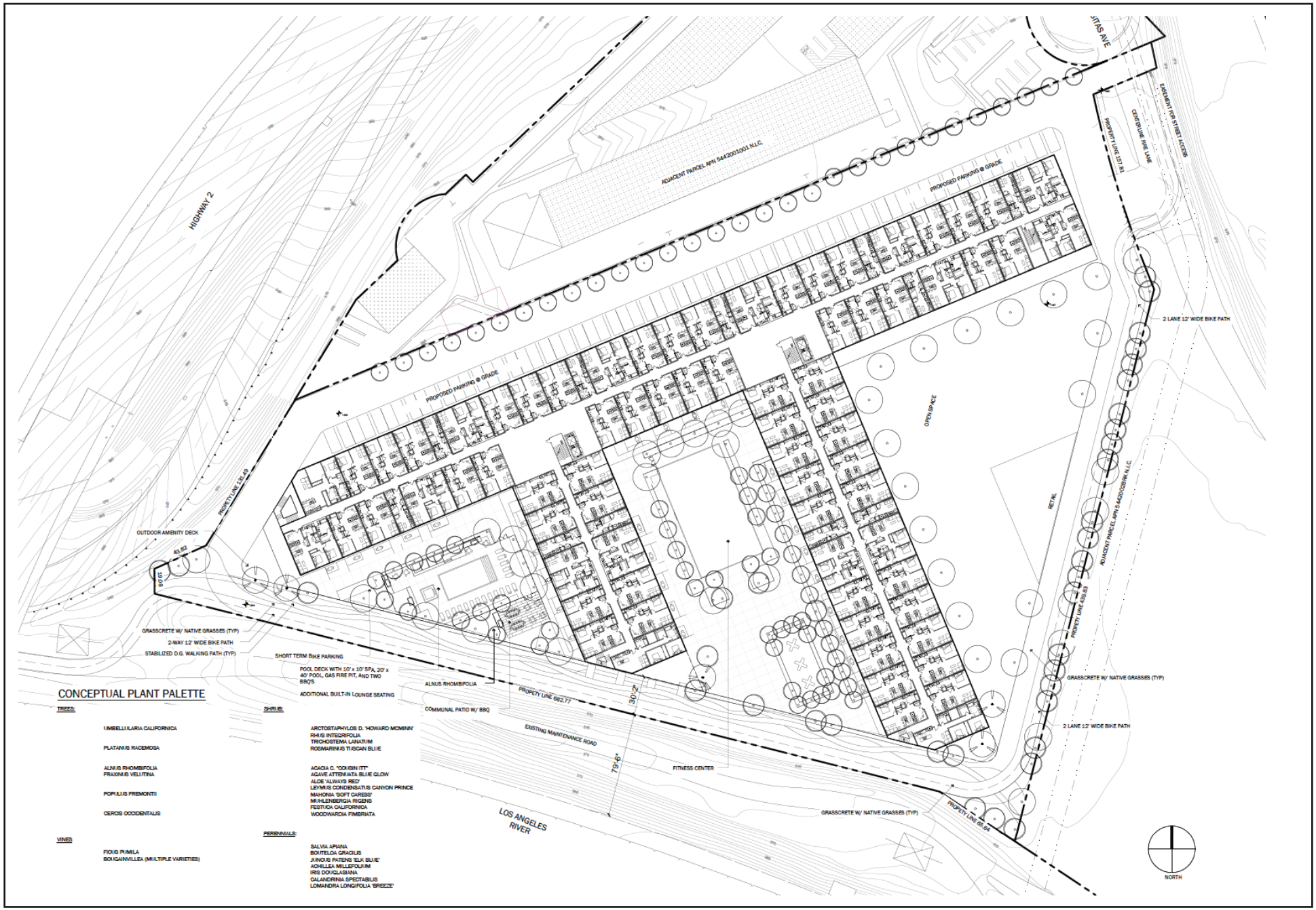
Source: Rios Clementi Hale Studios, June 22, 2018.

Figure V-2
Mixed-Use Podium Alternative Floor Plans




Source: Rios Clementi Hale Studios, June 22, 2018.

Figure V-3
Mixed-Use Podium Alternative Elevations




Source: Rios Clementi Hale Studios, June 22, 2018.

Figure V-4
Mixed-Use Podium Alternative Landscape Plan

**Table V.F-1**
**Mixed-Use Podium Alternative Land Use Summary**

| Land Uses | Dwelling Units | Floor Area (Square Feet) |
|---|---|---|
| ***Residential*** | | |
| Studio Units | 119 du | -- |
| One-Bedroom Units | 220 du | -- |
| Two-Bedroom Units | 80 du | -- |
| **Residential Subtotal** | **419 du** | **423,872 sf [a]** |
| ***Commercial*** | | |
| General Office | **--** | 19,000 |
| Restaurant | **--** | 3,000 |
| **Commercial Subtotal** | **--** | **22,000 sf** |
| **TOTAL** | **419 du** | **445,872 sf** |

*Notes: du = dwelling unit; sf = square feet*
*[a] Includes 10,700 sf residential amenity space.*

## 3. Commercial Uses

The Mixed-Use Podium Alternative would include approximately 22,000 square feet of commercial uses including 19,000 square feet of general office and 3,000 square feet of restaurant space. The 42,000 square feet of urban farm would not be included in this alternative scheme. The proposed commercial office space would be located along the southern property on the ground floor of Building A, which is planned as a mixed-use building with residential units above the first level. The restaurant spaces would be located on the ground floor fronting the eastern property line. A summary table describing the program metrics of the Mixed-Use Podium Alternative is provided in Table V.F-2, Summary of Proposed Development Program, below.

**Table V.F-2**
**Summary of Mixed-Use Podium Alternative Program Metrics**

| Project Characteristics | Required/Allowed By Code | Mixed-Use Podium Alternative |
|---|---|---|
| Project Site Lot Area | -- | 248,190 (5.7 acres) |
| Proposed Floor Area | 502,584 [a] | 445,872 square feet |
| General Plan Land Use Designation | Heavy Manufacturing | Limited Industrial |
| Zoning | [Q]PF-1-CDO-RIO | CM-1-CDO-RIO |
| Floor Area Ratio (FAR) | 2.03 : 1 [b] | 1.80 : 1 |
| Maximum Building Height | unlimited | 80 feet |
| Open Space | 43,900 square feet | 58,176 square feet |
| Vehicle Parking Spaces | 565 stalls | up to 720 stalls |
| Bicycle Parking Spaces | 207 spaces | 469 spaces |

*[a] Based on a allowable FAR of 1.5:1 and a total lot area of 248,190 square feet and 35% Density Bonus incentive.*
*[b] The 2.03:1 FAR is allowed due to 35% Density Bonus Incentive.*

## 4. Architectural Features

Architectural materials for the proposed buildings under this alternative would be similar to the proposed Project and would include medium grain finish plaster (stucco), concrete fiberboard panel siding, aluminum frame casement windows, aluminum frame sliding doors, aluminum storefront glazing, roll up sectional garage door, glass, painted steel guardrail and design features, and cast-in-place concrete.

The Mixed-Use Podium Alternative proposes the same number of dwelling units and commercial office and restaurant uses, but would eliminate the construction of the seven level parking structure with a rooftop urban farm. A single building would be developed with parking and commercial uses located on the ground level, and residential uses on levels 2 through 6. The height of the building would be 78 feet to the rooftop level, with the elevator overrun reaching a maximum height of 86 feet above grade.

## 5. Open Space Recreational Amenities

The Mixed-Use Podium Alternative would include 58,176 square feet of open space. The open space requirements and amount of open space proposed for this Alternative are summarized in Table V.F-3 below. As shown, the Mixed-Use Podium Alternative exceeds the required amount of open space by approximately 14,276 square feet.

Similar to the proposed Project, the Mixed-Use Podium Alternative would feature a variety of trees, shrubs, vines, and perennials. Proposed landscaping would also feature a variety of ornamental streetscape and common area landscaping. Like the proposed Project, this alternative would include communal patio, pool deck, lounge seating, outdoor barbeque, amenity deck, and community room space. Pursuant to the minimum tree requirements specified in LAMC Section 12.21G.2 (i.e., 1 tree per every 4 dwelling units), this alternative requires a minimum of 78 trees. The Mixed-Use Podium Alternative would include 140 trees. Similar to the proposed Project, the landscaping features would be provided at grade, on the porch levels (private balconies) and on the upper deck on balconies and in the common open space areas.

**Table V.F-3**
**Required and Proposed Open Space Calculations**

| Open Space Code Requirements | | | |
|---|---|---|---|
| **Type** | **Number of Units** | **Square Feet Required [a]** | **Total Square Feet Required** |
| Less than three habitable rooms (studio units and 1-bedroom units) | 339 | 100 sf / du | 33,900 |
| Three habitable rooms (2-bedroom) | 80 | 125 sf / du | 10,000 |
| | | **TOTAL** | **43,900** |
| **Open Space / Landscaping Features** | | **Area Proposed (Square Feet)** | |
| Ground Level | | 35,478 | |
| Porch Level | | 18,888 | |
| Second Level | | 3,810 | |
| **TOTAL OPEN SPACE PROPOSED** | | **58,176** | |

[a] *LAMC Section 12.21.G.2*

## 6. Signage and Lighting

Similar to the proposed Project, the Mixed-Use Podium Alternative would provide site identification and tenant signage for the commercial land uses and way-finding signage in accordance with the regulations of the LAMC. Interior spaces to the Project Site, including exterior walkways, accessways, open space areas, and fire lanes would be illuminated with low-level and directional lighting futures to provide for safe and secure pedestrian lighting environment. Lighting and illumination would conform to the illumination standards of the LAMC. Lighting fixtures would be designed and installed to ensure the direct light source cannot be seen from adjacent residential properties and/or the public right-of-way.

## 7. Vehicle Parking

The Mixed-Use Podium Alternative would provide up to 720 parking spaces, all located within the proposed parking level on the ground floor, which includes residential and commercial designated parking spaces. With up to 720 parking spaces provided on-site, the Mixed-Use Podium Alternative would provide 155 more spaces than the minimum spaces required by the LAMC. The proposed parking inventory would provide 1.72 spaces per dwelling unit to meet the proposed Project's anticipated parking demand. A summary of the Mixed-Use Podium Alternative's required and proposed parking spaces are provided in Table V.F-4, below.

**Table V.F-4**
**Summary of Required and Proposed Vehicle Parking Spaces**

| Description | Quantity | Parking Required by Code [a] | | Parking Provided |
|---|---|---|---|---|
| | | Rate | Spaces | |
| ***Residential*** | | | | |
| Less than three habitable rooms (studio and 1-bedroom units) | 339 du | 0.5 space / du | 339 | -- |
| More than three habitable rooms (2-bedroom units) | 80 du | 2 spaces / du | 160 | -- |
| | | ***Residential Subtotal*** | ***499*** | **--** |
| ***Commercial*** [b] | | | | |
| Commercial | 22,000 sf | 1 space / 500 sf | 44 | |
| Other Amenity Space | 10,700 sf | 1 space / 500 sf | 22 | |
| | | ***Commercial Subtotal*** | ***66*** | |
| | | **TOTAL** | **565** | **720** |

*Notes: du = dwelling unit, sf = square feet*
[a] *LAMC Section 12.22-A, 25(d)(1).*
[b] *The Project Site is located within an Enterprise Zone, which requires a minimum of 1 space/500 sf for commercial uses.*

## 8. Bicycle Parking

The Mixed-Use Podium Alternative would provide bicycle parking in accordance with the City's Bicycle Ordinance. As summarized in Table V.F-5, Summary of Required and Proposed Bicycle Parking Spaces, below, the Mixed-Use Podium Alternative would be required to provide 207 bicycle spaces, which includes 186 long-term bicycle spaces and 21 short-term bicycle spaces. The Mixed-Use Podium Alternative would provide 469 bicycle parking spaces. Bicycle parking spaces would be provided on the first level of the mixed-use building within the vehicle parking areas and in outdoor bike parking areas.

## 9. Floor Area Ratio (FAR) and Setbacks

The Project Site includes a total of 248,190 gross square feet of lot area. The Project Site is located in Height District No. 1, which limits development to an FAR of 1.5:1 but has no restriction on building height. Pursuant to the LAMC Section 12.2.1, the Project Site has an allowed floor area ratio (FAR) of 1.5 to 1. Since the Mixed-Use Podium Alternative would reserve 11 percent of its residential units as Very Low Income housing units, the proposed Project is eligible for a base FAR increase of 35 percent. As such, this Alternative would be allowed a maximum floor area of 502,584 square feet. The Mixed-Use Podium Alternative consists of up to 445,872 square feet of total floor area (up to 1.8:1 FAR).

**Table V.F-5**
**Summary of Required and Proposed Bicycle Parking Spaces**

| Description | Quantity | Parking Required [a] | | Subtotal Spaces Required | Total Spaces Provided |
|---|---|---|---|---|---|
| | | Short Term | Long Term | | |
| ***Restaurant*** | | ***1 space / 2,000 sf*** | ***1 space / 2,000 sf*** | | |
| Restaurant | 3,000 sf | 2 | 2 | 4 | -- |
| ***Office*** | | ***1 space / 10,000 sf*** | ***1 space / 5,000 sf*** | | |
| Office | 19,000 sf | 2 | 4 | 6 | -- |
| ***Residential*** | | ***space / du [b]*** | ***1 space / 1 du [c]*** | | |
| Dwelling Units 1-25 | 25 | 2 | 25 | 27 | |
| Dwelling Units 26-100 | 75 | 5 | 50 | 55 | |
| Dwelling Units 101-200 | 100 | 5 | 50 | 55 | |
| Dwelling Units >200 | 219 | 5 | 55 | 55 | |
| ***Subtotal Residential*** | ***419*** | ***17*** | ***180*** | ***197*** | |
| **TOTAL** | | **21** | **186** | **207** | **469** |

*Notes: du = dwelling unit, sf = square feet*
*[a] LAMC 12.21 A.16, Table 12.21*
*[b] Short-term bicycle parking requirements are 1 space per 10 units for units 1-25, 1 space per every 15 units for units 26-100, 1 space per every 20 units for units 101-200, and 1 space per ever 40 units for all units above 201.*
*[c] Long-term bicycle parking requirements are 1 space per unit for units 1-25, 1 space per every 1.5 units for units 26-100, 1 space per every 2 units for units 101-200, and 1 space per every 4 units for all units above 201.*

Building A would include a maximum of five residential stories above the podium level (total of six levels). The parking podium with ground floor commercial uses would reach a maximum height of 24 feet above grade, and the height of the building would reach a maximum height of approximately 80 feet above grade at the top of the parapet.

## 10. Construction and Scheduling

As with the proposed Project, all construction activities under the Mixed-Use Podium Alternative would be performed in accordance with all applicable state and federal laws, and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. The proposed Project would comply with these restrictions.

Due to the proposed Project's location at the terminus of Casitas Avenue, construction activities are not anticipated to require any lane closures on local streets. Site deliveries and the staging of all equipment and materials shall be organized on-site in the most efficient manner possible to avoid and minimize any temporary impacts upon the surrounding neighborhood. Construction equipment shall be staged on-site for the duration of construction activities.

The Mixed-Use Podium Alternative would involve the same general construction activities as the proposed Project on a daily basis. However, given its reduced square footage due to the elimination of the urban farm, the overall duration of construction would be incrementally shorter Similar to the proposed Project, the Mixed-Use Podium Alternative would include the demolition of approximately 117,000 square feet of the existing building and the removal of the asphalt paved parking lot (3,000 cubic yards of asphalt) on the Project Site. The grading/excavation phase for the Mixed-Use Podium Alternative would also be the same as the proposed Project, as excavations up to approximately 15 feet deep would be required for earthwork removal and recompaction. Like the proposed Project, the Mixed-Use Podium Alternative would require approximately 6,900 cubic yards of soil to be hauled off-site in order to ensure a proper base for the building foundations. The proposed Haul Route and number of haul trips would be the same under this Alternative as proposed under the proposed Project.

## 11. Entitlement Requests

The Mixed-Use Podium Alternative would seek all of the discretionary approvals as required under the proposed Project. Accordingly, the Mixed-Use Podium Alternative would require the following entitlements:

1) Pursuant to LAMC Section 11.5.6, a **General Plan Amendment** to the Northeast Los Angeles Community Plan to change the land use designation from Heavy Manufacturing to Limited Industrial;

2) Pursuant to LAMC Section 12.32.Q, a Vesting **Zone Change and Height District Change** from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO;

3) Pursuant to LAMC Section 16.05.C.1(b), **Site Plan Review** for the development of up to 419 residential units and up to 22,000 square feet of commercial uses;

4) Pursuant to California Government Code Section 65915(f)(3) and LAMC Section 12.22-A,25, a **Density Bonus Compliance Review** for the Project providing 11 percent of the total units (excluding density bonus units) as Very

Low Income Units to permit a mixed-use development with the following development incentives and waiver:

a. Density Bonus to allow a 35 percent increase in the permitted density to allow 419 units in lieu of the 310 units otherwise permitted in the CM zone;

b. One on-menu incentive to allow a maximum 35 percent increase in Floor Area Ratio (FAR); and

c. One off-menu waiver to use the lot area of the site as the buildable area for calculating floor area;

5) Pursuant to LAMC Section 13.08, a **Design Overlay Plan Approval**;

6) Pursuant to LAMC Section 12.24-W,1, a **Conditional Use Permit (CUB)** to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption in conjunction with (a) a proposed restaurant with 1,435 square feet of interior space and 838 square feet of exterior space and 104 total seats, inclusive of outdoor seating; and (b) a proposed beer garden with 845 square feet of interior space and 1,951 square feet of exterior space and 105 total seats, inclusive of outdoor seating;

7) Pursuant to LAMC Section 17.15, a **Vesting Tentative Tract Map** for the subdivision of one lot into one ground lot and multiple airspace lots.

Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Mixed-Use Podium Alternative, including demolition permits, haul route approval, grading and associated building permits. On-site Parking would be provided pursuant to LAMC Section 12.22.A.25(d)1.

# 2. Environmental Analysis

## a) Aesthetics

As there are no views of scenic vistas available through, or scenic resources on, the Project Site, the Mixed-Use Podium Alternative's impacts with respect to these issues would be the same as under the proposed Project and also less than significant.

The Mixed-Use Podium Alternative would reduce the height of the building compared to the proposed Project's highest building. This alternative would include six stories and a height of 80 feet above grade (five feet less than the proposed Project). Like the proposed Project, the Mixed-Use Podium Alternative would be designed and landscaped in accordance with the Cypress Park and Glassell Park Community Design Overlay Design

Guidelines (CDO Design Guidelines) and the RIO Design Guidelines. Also like the proposed Project, development of the Mixed-Use Podium Alternative would improve views of the Project Site from public views and from the pedestrian paths that run along the south side and north side of the River as compared to existing conditions. However, the Mixed-Use Podium Alternative would have less massing and a reduced height as compared to the proposed Project. Therefore, the visual character impacts of this Alternative would be less than the proposed Project's less than significant impact.

As the Mixed-Use Podium Alternative would have lighting and building materials to the proposed project, this alternative would have similar light and glare impacts as the proposed Project. Similar to the proposed Project, the Mixed-Use Podium Alternative would comply with Section 99.05.106.8, Light Pollution Reduction, of the City of Los Angeles Green Building Code (Ord. 182849) to ensure that lighting impacts would be reduced. With regards to nighttime lighting and daytime glare, the Mixed-Use Podium Alternative would result in a less than significant impact, similar to the proposed Project.

## b) Air Quality

### (1) Construction

As the Mixed-Use Podium Alternative would use the same construction equipment on a daily basis as the proposed Project, daily construction emissions under this alternative would be the same as the proposed Project. However, as the construction schedule would have an incrementally shorter duration than the proposed Project, the Mixed-Use Podium Alternative would generate less total construction emissions compared to the proposed Project. Similar to the proposed Project, the Mixed-Use Podium Alternative's construction TAC emissions would be short-term and would also result in a less than significant impact. Therefore, the air quality impacts of the Mixed-Use Podium Alternative would be considered the similar to the proposed Project's less than significant impacts.

### (2) Operation

The Mixed-Use Podium Alternative would generate 78 fewer daily trips than the proposed Project. As such, this Alternative's traffic volumes and associated mobile source emissions would be reduced as compared to the proposed Project. Similar to the proposed Project, the Mixed-Use Podium Alternative would not violate any air quality standards and would be required to implement all required SCAQMD rules and regulations. By meeting SCAQMD rules and regulations, the Mixed-Use Podium Alternative would also be consistent with the goals of the 2016 AQMP. Compared to the proposed Project, the Mixed-Use Podium Alternative would have reduced air quality emission impacts. As shown in Table V-F-6, Mixed-Use Podium Alternative Operational

**Table V.F-6**
**Mixed-Use Podium Alternative Estimated Daily Operational Emissions**

| Emissions Source | Emissions in Pounds per Day | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
| **Summertime (Smog Season) Emissions** | | | | | | |
| Area Source | 10.73 | 0.39 | 34.65 | <0.01 | 0.19 | 0.19 |
| Energy | 0.16 | 1.40 | 0.69 | <0.01 | 0.11 | 0.11 |
| Mobile (Vehicles) | 4.62 | 20.20 | 62.18 | 0.24 | 20.98 | 5.72 |
| ***Total Project Emissions*** | ***15.51*** | ***21.99*** | ***97.52*** | ***0.24*** | ***21.28*** | ***6.02*** |
| *Less Existing Project Site* | *-4.02* | *-7.20* | *-20.67* | *-0.06* | *-4.26* | *-1.22* |
| **Net Project Emissions** | **11.54** | **14.15** | **78.25** | **0.19** | **17.02** | **4.80** |
| **SCAQMD Thresholds** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potentially Significant** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Wintertime (Non-Smog Season) Emissions** | | | | | | |
| Area Source | 10.78 | 0.39 | 34.65 | <0.01 | 0.19 | 0.19 |
| Energy | 0.16 | 1.40 | 0.70 | <0.01 | 0.11 | 0.11 |
| Mobile (Vehicle) Sources | 4.38 | 20.60 | 57.95 | 0.23 | 20.98 | 5.72 |
| ***Total Project Emissions*** | ***15.32*** | ***22.39*** | ***93.3*** | ***0.23*** | ***21.28*** | ***6.02*** |
| *Less Existing Project Site* | *-3.97* | *-7.42* | *-19.27* | *-0.05* | *-4.26* | *-1.22* |
| **Net Project Emissions** | **11.35** | **14.97** | **74.03** | **0.18** | **17.02** | **4.8** |
| **SCAQMD Thresholds** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Potentially Significant** | **No** | **No** | **No** | **No** | **No** | **No** |

*Note: Calculation worksheets are provided in Appendix N to this Draft EIR.*
*Source: Parker Environmental Consultants, 2019.*

Air Quality Impacts, this Alternative would result in less than significant air quality impacts for all six criteria pollutants and operational emissions would be reduced as compared to the less than significant operational air quality emissions generated by the proposed Project.

## c) Geology and Soils

### (1) Geologic and Seismic Hazards

As discussed in the Geotechnical Investigation for the Project Site, seismic hazards relating to surface rupture, liquefaction, lateral spreading, landsliding, subsidence, and collapse are considered low risk issues on the Project Site. The primary seismic hazard for the Project Site is the potential for strong ground motion. The Project Site is susceptible to ground motion and shaking as a result of potential movement along faults in the region. The Project Site is located in a seismically active region, as is all of Southern California. The Mixed-Use Podium Alternative would be designed and constructed in

conformance with the most recently adopted California Building Code and Los Angeles Building Code design parameters, which are specifically tailored to minimize the risk of structure failure due to seismic hazards. Further, the design and construction of the Mixed-Use Podium Alternative would be subject to the review and approval of the Department of Building and Safety. Like the proposed Project, the Mixed-Use Podium Alternative would be required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter and Project's Geotechnical Investigation and the requirements outlined in the latest edition of the City of Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the LAMC, as discussed in Section IV.C, Geology and Soils. This alternative would have a less than significant impact with respect to seismic hazards. When compared to the proposed Project, the Mixed-Use Podium Alternative would have similar impacts with respect to potential seismic hazards.

Similar to the proposed Project, the Mixed-Use Podium Alternative's construction impacts on soil erosion, sedimentation, and stormwater management would be less than significant with compliance to the requirements outlined in the Chapter IX, Division 70 of the City's Uniform Building Code; the LID Ordinance 183,833; and the Standard Urban Stormwater Mitigation Plan (SUSMP), as stated in Section IV.C, Geology and Soils. The Mixed-Use Podium Alternative would be required to implement the soil erosion control measures and LID Ordinance to control soil erosion and sedimentation. Impacts would be similar to the proposed Project, and the Mixed-Use Podium Alternative would also result in a less than significant impact related to erosion and sedimentation impacts.

#### a. Paleontological Resources

The proposed Project would result in a less than significant impact upon paleontological resources, as the Project Site has been subject to past ground disturbing activities and, based on a records search by the Natural History Museum of Los Angeles County - Vertebrate Paleontology Department, no known paleontological resources have been recorded within the Project Site. The Mixed-Use Podium Alternative would require similar construction activities as the proposed Project. Therefore, the Mixed-Use Podium Alternative would have similar impacts to the proposed Project and would result in a less than significant impact upon paleontological resources.

## d) Greenhouse Gas Emissions

### (1) Construction

The Mixed-Use Podium Alternative would have the same general construction activities on a daily basis as the proposed Project. Since this Alternative includes 42,000 square

feet less floor area, the Mixed-Use Podium Alternative would overall generate less greenhouse gas emissions during construction compared to the proposed Project. Similar to the proposed Project, the Mixed-Use Podium Alternative would result in a less than significant impact, but construction GHG emissions would be reduced compared to the proposed Project.

### (2) Operation

Similar to the proposed Project, operation of the Mixed-Use Podium Alternative would generate air pollution emissions from stationary sources and mobile sources and contribute to increased greenhouse gas emissions compared to the existing operations on-site. The proposed Project would include a total of 419 dwelling units and 64,000 square feet of ground floor commercial uses. By comparison, the Mixed-Use Podium Alternative includes a total of 419 dwelling units and 22,000 square feet of ground floor commercial uses. The residential and commercial space would be the same as proposed under the proposed Project with the exception of the urban farm. The Mixed-Use Podium Alternative would comply with the same energy efficiency requirements of the L.A. Green Building Code, as applicable for a mixed-use residential and commercial project. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. With respect to operational GHG emissions from mobile sources, the Mixed-Use Podium Alternative would result in 78 fewer average daily trips as compared to the proposed Project. Thus, the operational GHG emissions associated with vehicles traveling to and from the Project Site during the operation of the Mixed-Use Podium Alternative would be reduced, as compared to the proposed Project.

As discussed in Section IV.D, Greenhouse Gas Emissions, the proposed Project's annual generation of GHG emissions is estimated to be 4,269.40 $CO_2$e MTY. Since the Mixed-Use Podium Alternative would not include the 42,000 square-foot urban farm, this Alternative's estimated annual GHG emissions would be less than the proposed Project's GHG emissions. As shown in Table V.F-7, below, the Mixed Use Podium Alternative's estimated annual GHG emissions is 4,085 $CO_2$e MTY, which is approximately 4 percent less than the proposed Project's GHG emissions. The Mixed-Use Podium Alternative would similarly result in a less than significant impact but with reduced GHG emissions.

**Table V.F-7**
**Mixed-Use Podium Alternative Operational Greenhouse Gas Emissions**

| Emissions Source | $CO_2e$ Emissions (Metric Tons per Year) |
|---|---|
| Area | 7.24 |
| Energy | 1,741 |
| Mobile | 3,818 |
| Waste | 31 |
| Water | 320 |
| ***Total Reduced Density Alternative:*** | ***5,917*** |
| *Less Existing Project Site:* | *-1,832* |
| **NET Reduced Density Alternative Emissions:** | **4,085** |
| *Calculation data and results provided in Appendix N to this Draft EIR.* | |

## e) Hazardous Materials and Risk of Upset

As described in Section IV.E, Hazardous Materials/Risk of Upset, the Project Site is identified on the following databases: FINDS, CA HAZNET, CA EMI, RCRA-LQG, US AIRS, and EDR US Historical Auto Station. The Project Site addresses were also identified in the EDR database report related to the former Taylor Yard facility of which the Project Site was a part. As such, the proposed Project would implement Project Design Feature HAZ-PDF-1, which requires the preparation and implementation of a Soil Management Plan to address potential hazardous substances and/or petroleum produces that may be encountered during construction. The Mixed-Use Podium Alternative would require similar construction activities as the proposed Project. As with the proposed Project, the Mixed-Use Podium Alternative's adherence to applicable regulatory compliance measures and implementation of HAZ-PDF-1 would mitigate any potential hazardous impacts during the construction phase to less than significant levels.

Additionally, the Los Feliz Charter School for the Arts (located less than 250 feet northeast of the Project Site) would be considered a sensitive receptor regarding hazardous materials exposure. Similar to the proposed Project, implementation of HAZ-PDF-1 would ensure that the Mixed-Use Podium Alternative would have a less than significant impact upon the nearby school.

## f) Land Use and Planning

The Mixed-Use Podium Alternative would seek the same general discretionary actions as the proposed Project. With approval of the requests, the Mixed-Use Podium Alternative would be in conformance with applicable provisions of the LAMC and General Plan. The Mixed-Use Podium Alternative would also not conflict with local and regional plans applicable to the Project Site. Similar to the proposed Project, the Mixed-Use Podium

Alternative would be consistent with several effective strategies to reduce future resident's exposure to poor ambient air quality from the Glendale Freeway. Land use impacts would be less than significant under this alternative. Therefore, the Mixed-Use Podium Alternative would generate similar land use impacts to the proposed Project's less than significant impacts.

## g) Noise

### (1) Construction

As discussed in Section IV.G, Noise, the construction-related noise and groundborne vibration impacts associated with the proposed Project would be less than significant. The day-to-day noise levels during active construction periods are anticipated to be the same as the proposed Project under the Mixed-Use Podium Alternative. The same construction code compliance requirements identified in Section IV.G, Noise, would also be applicable to this alternative. Thus, construction noise and vibration impacts under the Mixed-Use Podium Alternative would have similar impacts as compared to the proposed Project's less than significant impacts.

### (2) Operation

The operational noise generated under the Mixed-Use Podium Alternative would be typical of residential and commercial land uses. The Mixed-Use Podium Alternative's noise levels associated with outdoor noise sources, on-site mechanical equipment, and noise generated within the parking garage would be less than significant, similar to the proposed Project. With respect to roadway noise levels, the Mixed-Use Podium Alternative would result in 78 less trips per day. The Mixed-Use Podium Alternative is anticipated to generate significant roadway noise impacts at one roadway segment: 1) La Clede Avenue, between Fletcher Drive and Carillon Street, though at lower noise levels than the proposed Project (see Appendix O to this Draft EIR). The traffic mitigation measures TRANS-MM-1 through TRANS-MM-3 would also be applicable to this Alternative. Since the Mixed-Use Podium Alternative would result in fewer trips, the roadway noise impact would be less than the proposed Project, but operational noise impacts from roadway noise would be significant and unavoidable under the Mixed-Use Podium Alternative, similar to the proposed Project.

## h) Population and Housing

As discussed in Section IV.H, Population and Housing, the proposed Project would be consistent with the Northeast Los Angeles Community Plan and the SCAG 2016-2040 RTP/SCS growth projections with respect to population, housing, and employment. The

Mixed-Use Podium Alternative includes a total of 419 dwelling units and 22,000 square feet of commercial space. Because the Mixed-Use Podium Alternative would generate less commercial space, the employment growth would be slightly less than the proposed Project. Because the Mixed-Use Podium Alternative would provide the same number of housing, this alternative would generate the same number of residents as the proposed Project. The Mixed-Use Podium Alternative would also be consistent with the Northeast Los Angeles Community Plan and the SCAG 2016-2040 RTP/SCS growth projections. The impact to population under this alternative would also be less than significant and would be similar to the proposed Project. Therefore, the Mixed-Use Podium Alternative would generate similar population growth impacts to the proposed Project's less than significant impacts.

## i) Public Services

The proposed Project was found to have a less than significant impact on fire protection services, schools, parks, and libraries. Since the Mixed-Use Podium Alternative would include the same number of dwelling units and no urban farm, this alternative would have similar impacts with respect to fire protection services, police protection services, schools, parks, and libraries. Similar to the proposed Project, the Mixed-Use Podium Alternative would implement Project Design Features POL-PDF-1 through POL-PDF-3. In addition, this Alternative would pay school fees to the LAUSD and applicable parks fees to the Department of Recreation and Parks. When compared to the proposed Project, the Mixed-Use Podium Alternative would have similar impacts on fire protection services, police protection services, schools, parks, and libraries as compared to the proposed Project's less than significant impacts as the resident population would be the same.

## j) Utilities and Service Systems

### (1) Water

Impacts associated with local water conveyance and infrastructure upgrades are anticipated to be similar under the Mixed-Use Podium Alternative as compared to the proposed Project and would be less than significant. Under the proposed Project, the anticipated water demand is expected to result in a net increase of 85,023 gallons per day or approximately 95 acre-feet of water per year. Comparatively, as shown in Table V.F-8, below, the net water demand associated with the Mixed-Use Podium Alternative would be approximately 81,689 gpd or 91 acre-feet per year, which is roughly four percent less than the proposed Project's water demand.

**Table V.F-8**
**Estimated Water Demand by the Mixed Use Podium Alternative**

| Type of Use | Quantity Unit | Water Use (gpd/unit) [a] | Proposed Water Demand (gpd) | (AFY) |
|---|---|---|---|---|
| **Existing Uses** | | | | |
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 | - |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 | - |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 | - |
| Landscaping | 7,150 sf | (MAWA)[b] | 335 | - |
| | | **Existing Water Demand:** | **9,767** | **11** |
| **Proposed Uses** | | | | |
| **Residential Units (419 total du)** | | | | |
| Studio | 119 du | 75 gpd/du | 8,925 | - |
| One Bedroom | 220 du | 110 gpd/du | 24,200 | - |
| Two-Bedroom | 80 du | 150 gpd/du | 12,000 | - |
| Swimming Pool and Spa [c] | 5,056 cu. ft. | 7.78 gpd / cu. ft. | 39,336 | - |
| | | ***Residential Total:*** | ***84,461*** | ***95*** |
| **Commercial Uses (64,000 total sf)** | | | | |
| Office | 19,000 sf | 0.120 gpd/sf | 2,280 | - |
| Restaurant (3,000 sf [d]) | 133 seats | 30 gpd/seat | 3,990 | - |
| ***Commercial Subtotal:*** | | | ***6,270*** | ***7*** |
| Landscaping [e] | 15,486 sf | (MAWA) | 725 | ***0.8*** |
| | | **Total Proposed Project Water Demand:** | **91,456** | **102** |
| | | *Minus Existing Demand:* | *- 9,767* | *- 11* |
| | | **Net Additional Water Demand:** | **81,689** | **91** |

*Notes: du: dwelling unit, sf: square feet, gpd: gallons per day; AFY: acre feet per year*
*All numbers rounded to the nearest gpd or AFY.*

[a] *Based on sewer generation rates provided in the City's L.A. Sanitation, Wastewater Engineering Services Division correspondence letter, dated April 20, 2017 (See Appendix B to this DEIR).*

[b] *Water demand for existing landscaped areas was based on approximately 7,150 sf of existing landscaped area and the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (MAWA)(LA Green Building Code Sec. 99.04.304).*

[c] *The estimate for swimming pools is conservative as it is based on replacing the entire volume of water on a daily basis.*

[d] *Restaurant seats were estimated based on 15 sf per seat for the dining area, which was assumed to occupy 2/3 of the restaurant space. Rates were estimated on indoor seating for a conservative estimate.*

[e] *Landscaping water demand for the proposed Project was based on 15,486 square feet of landscaped open space area and the California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304).*

*Source: Parker Environmental Consultants, 2019.*

As discussed in Section IV.J-1, Water, the 2015 UWMP has evaluated the City's water supply in comparison to SCAG's regional growth projections and has determined that the City has adequate capacity to serve the anticipated growth in the region. Similar to the proposed Project, because this Alternative would not exceed the planned growth

projections for the existing General Plan and zoning density requirements of the Project Site, the projected demands associated with this alternative can be accommodated by the City's water supply. Therefore, similar to the proposed Project, the Mixed-Use Podium Alternative would result in less than significant impacts. Compared to the proposed Project, impacts regarding future water demands would be reduced under this alternative.

### (2) Wastewater

As concluded in Section IV.J-2, Wastewater, the existing local wastewater infrastructure would be expected to adequately serve the proposed Project and the anticipated wastewater flows would be less than significant and within the treatment capacity of the Hyperion Water Reclamation Plant. Under the proposed Project, the anticipated wastewater generation is expected to result in a net increase of 84,633 gpd. Comparatively, as shown in Table V.F-9, below, the net wastewater generation associated with the Mixed-Use Podium Alternative would be approximately 81,299 gpd, or roughly four percent less than the proposed Project's wastewater generation.

With respect to anticipated wastewater generation, the Mixed-Use Podium Alternative would result in a decrease in wastewater generation. As the projected demands associated with the Mixed-Use Podium Alternative are less than the proposed Project, the same conclusion can be reached that this alternative can be adequately accommodated by the City's wastewater infrastructure and treatment facilities without any significant impact to the environment. Similar to the proposed Project, the Mixed-Use Podium Alternative would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. Compared to the proposed Project, impacts regarding future wastewater generation would be reduced under this alternative.

**Table V.F-9**
**Estimated Wastewater Generation by the Mixed Use Podium Alternative**

| Type of Use | Size | Wastewater Demand Rate (gpd/unit) [a] | Total Wastewater Demand (gpd) |
|---|---|---|---|
| **Existing Uses** | | | |
| Manufacturing Space | 87,000 sf | 0.096 gpd/sf | 8,352 |
| Warehouse | 25,000 sf | 0.024 gpd/sf | 600 |
| Production Space | 5,000 sf | 0.096 gpd/sf | 480 |
| | | **Existing Wastewater Generation:** | **9,432** |
| **Proposed Project** | | | |
| **Residential Units (419 total du)** | | | |
| Studio | 119 du | 75 gpd/du | 8,925 |
| One Bedroom | 220 du | 110 gpd/du | 24,200 |
| Two-Bedroom | 80 du | 150 gpd/du | 12,000 |
| Swimming Pool and Spa [b] | 5,056 cu. ft. | 7.78 gpd/cu. ft. | 39,336 |
| | | ***Residential Subtotal:*** | ***84,461*** |
| **Commercial Uses (64,000 total sf)** | | | |
| Office | 19,000 sf | 0.12 gpd/sf | 2,280 |
| Restaurant (3,000 sf) | 133 seats [c] | 30 gpd/seat | 3,990 |
| | | ***Commercial Subtotal:*** | ***6,270*** |
| | | **Total Project Wastewater Generation:** | **90,731** |
| | | *Less Existing Wastewater Generation:* | *-9,432* |
| | | **NET TOTAL Wastewater Generation:** | **81,299** |

*Notes: sf =square feet; du = dwelling units, gpd: gallons per day*

[e] *Based on correspondence with the City of Los Angeles Bureau of Sanitation (dated April 20, 2017). Contained in Appendix B to this DEIR.*

[f] *Included based on the correspondence with the City of Los Angeles Bureau of Sanitation (dated April 20, 2017). Contained in Appendix B to this DEIR. This estimate is conservative as it is based on draining the entire volume of swimming pool water on a daily basis.*

[g] *Seats were estimated based on 15 sf per seat for the dining area, which was assumed to occupy 2/3 of the restaurant space.*

*Parker Environmental Consultants, 2019.*

### (3) Solid Waste

Similar to the proposed Project, the Mixed-Use Podium Alternative would comply with all federal, state and local statutes and regulations related to solid waste and impacts would be less than significant. The proposed Project's demolition and construction activities are estimated to generate approximately 10,658 tons of debris. Comparatively, as shown in Table V.F-10, below, the Mixed-Use Podium Alternative would generate 10,314 tons of construction and demolition debris, which equates to roughly three percent decrease in the solid waste material as compared to the proposed Project. Similar to the proposed

**Table V.F-10**
**Estimated Construction and Demolition Debris by the Mixed-Use Podium Alternative**

| Construction Activity | Size | Rate (lbs./sf) [a b] | Generated Waste (tons) |
|---|---|---|---|
| ***Demolition*** | | | |
| Industrial Building | 117,000 sf | 155 lbs/sf | 9,068 |
| **Total Demolition Debris Generation:** | | | **9,068** |
| ***Construction*** | | | |
| Multi-Family Residential | 308,285 sf | 4.39 lbs/sf | 677 |
| Commercial | 22,000 sf | 4.34 lbs/sf | 48 |
| Parking Garage | 240,000 sf | 4.34 lbs/sf | 521 |
| **Total Construction Debris Generation:** | | | **1,246** |
| **Mixed-Use Podium Alternative NET TOTAL:** | | | **10,314** |

*Notes: sf = square feet; lbs = pounds*
[c] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[d] *United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003.*
*Source: Parker Environmental Consultants, 2019.*

Project, all construction and demolition debris generated by the Mixed-Use Podium Alternative would be delivered to a Certified Construction and Demolition Waste Processing Facility. Similar to the conclusion regarding the proposed Project, the amount of solid waste generated during construction of the Mixed-Use Podium Alternative would fall well within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be similar to the proposed Project and less than significant.

Similar to the proposed Project, operation of the Mixed-Use Podium Alternative would cause on-going generation of solid waste throughout the lifespan of this alternative. As discussed in Section IV.J-3, Solid Waste, the proposed Project would generate approximately 3,883 pounds (1.94 tons) of solid waste per day, or approximately 709 tons per year. Comparatively, as shown in Table V.F-11 below, the Mixed-Use Podium Alternative would generate approximately 3,514 lbs/day of solid waste or approximately 641 tons per year. Operational solid waste under the Mixed-Use Podium Alternative would be approximately 10 percent less solid waste generated by the proposed Project. Therefore, similar to the proposed Project, solid waste impacts under the Mixed-Use Podium Alternative would be less than significant. Compared to the proposed Project, the operational solid waste impacts would be reduced under the Mixed-Use Podium Alternative.

**Table V.F-11**
**Estimated Operational Solid Waste Generation by Mixed-Use Podium Alternative**

| Type of Use | Size | Solid Waste Generation Rate [a] (lbs/unit/day) | Total Solid Waste Generated (lbs/day) |
|---|---|---|---|
| **Existing Uses** | | | |
| Industrial (117,000 sf) | 219 emp [b] | 8.93 lbs/emp/day | 1,956 |
| ***Subtotal Existing Solid Waste Generation:*** | | | ***1,956*** |
| **Mixed-Use Podium Alternative** | | | |
| Multi-Family Residential | 419 du | 12.23 lbs/du/day | 5,124 |
| Office | 19,000 sf | 0.006 lbs/sf/day | 114 |
| Restaurant (3,000 sf) | 22 emp [b] | 10.53 lbs/emp/day | 232 |
| ***Total Mixed-Use Podium Alternative Solid Waste Generation:*** | | | ***5,470*** |
| *Less Existing Uses:* | | | *-1,956* |
| **NET TOTAL Solid Waste Generation:** | | | **3,514** |

*Notes: sf =square feet; du = dwelling units; emp = employee*
[d] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[e] *Employees were projected based on 1 employee per 535 square feet of manufacturing business, 1 employee per 134 square feet of restaurant space. Source: U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*
*Source: Parker Environmental Consultants, 2019.*

### (4) Electric Power, Natural Gas, and Telecommunications Infrastructure

#### *(a) Electric Power*

Under the proposed Project, the total estimated electricity use from construction activities would be 5,915 kilowatt-hours (kWh), which is less than the demand generated by the existing uses. Similar to the proposed Project, construction of the Mixed-Use Podium Alternative would be serviced by the existing electric infrastructure serving the Project Site. Energy demands associated with construction equipment would require less power than existing land uses in operation at the Project Site. Thus, similar to the proposed Project, construction impacts upon electric power infrastructure would be less than significant.

The proposed Project's operational net increase in electricity demand is estimated to be approximately 1,337,720 kWh/year (see Table IV.O-5, in Section IV.O, Energy). The estimated net increase in electricity demand by the Mixed-Use Podium Alternative is estimated to be the same as the proposed Project (see Table V.F-12, under the Energy subheading below). Similar to the proposed Project, establishing electric power service to the Mixed-Use Podium Alternative would involve disconnecting existing power

connections and establishing new connections to serve the proposed structures. Such improvements would be localized in nature and would include service connections to overhead power poles and/or existing underground transformers. Thus, the Mixed-Use Podium would result in similar less than significant impacts upon electric infrastructure, though impacts associated with electricity use would be slightly reduced.

*(b) Natural Gas*

The proposed Project's operational net increase in natural gas demand is estimated to be 3,372,230 kbtu/year, or approximately 275,509 cubic feet cf/month. As shown in Table V.F-13 (under the Energy subheading below), the estimated net increase in natural gas demands by the Mixed-Use Podium Alternative would be the same as the natural gas demand of the proposed Project. Similar to the proposed Project, it is not anticipated that any new natural gas distribution infrastructure or facilities would be constructed or expanded as a result of this Alternative. The Mixed-Use Podium would connect to the existing infrastructure serving the Project area. Impacts associated with utility connections would be temporary in nature, and thus would result in less than significant impacts upon the environment. Therefore, impacts associated with natural gas infrastructure under this alternative would be less than significant and similar to the proposed Project.

*(c) Telecommunications Infrastructure*

The Project Site is currently developed with an operational warehouse/light manufacturing/film production use and is served by existing telecommunications infrastructure. Similar to the proposed Project, this Alternative would be served by the existing telecommunications services that service the Project Site and surrounding area. When compared to the proposed Project's less than significant impact, the Mixed-Use Podium Alternative would have similar less than significant impacts upon existing telecommunications facilities.

# k) Traffic/Transportation

## (1) Plan Consistency

The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Similar to the proposed Project, the Mixed-Use Podium Alternative would provide pedestrian and bicycle connectivity through the Project Site to the adjacent future Bowtie Park parcel. As such, the Mixed-Use Podium Alternative would have similar less than significant impacts with respect to not conflicting with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

### (2) VMT Analysis

Under the Mixed-Use Podium Alternative, the vehicle miles traveled (VMT) were calculated and analyzed under the Household VMT/Capita threshold and the Work VMT/Capita threshold and compared to the proposed Project. For the Household VMT/Capita threshold, the Mixed-Use Podium Alternative would result in a VMT ratio of 12.9 miles per household, which is 0.2 VMT/Capita above as the proposed Project but above the 7.2 Household VMT/Capita threshold.

For the Work VMT/Capita threshold, the Mixed-Use Podium Alternative would result in a Work VMT/Capita 14.4 miles per worker, which is above the 12.7 Work VMT/Capita threshold. The proposed Project's Work VMT/Capita is 14.9, thus the Mixed-Use Podium Alternative would result in a 0.5 VMT/Capita reduction as compared to the proposed Project.

With mitigation, the Project's Household VMT/Capita impact would be reduced to 10.5 miles per household and the Work VMT/Capita would be reduced to 14.2 miles per worker. The Mixed-Use Podium Alternative would employ similar VMT-related mitigation measures as proposed for the Project with respect to parking, education/ encouragement, shared mobility, bicycle infrastructure, and neighborhood enhancement. With Mitigation, the Household VMT/Capita impact would be reduced to 10.5 miles per household and the Work VMT/Capita would be reduced to 13.4 miles per worker. However, impacts would still remain significant and the same as the proposed Project for the Household VMT/Capita threshold and significant and slightly lower under the Work VMT/Capita threshold. As such, this alternative would not be effective in reducing the proposed Project's significant VMT impacts.

## I) Cultural Resources

### (1) Historical Resources

The Project Site is located within the Taylor Yard Opportunity Area within the Los Angeles River corridor. Three archaeological sites have been recorded and 53 properties have been evaluated for historical significance. Seven historical buildings have been confirmed within the vicinity of the Taylor Yard Opportunity Area, none of which are located on the Project Site. Under the proposed Project, no known historical resources would be impacted from the construction of the proposed Project. The Mixed-Use Podium Alternative would require similar construction activities as the proposed Project. Therefore, the Mixed-Use Podium Alternative would have a similar conclusion compared to the proposed Project and would result in a less than significant impact upon historic resources.

### (2) Archaeological Resources

As discussed in Section IV.L, Cultural Resources, the proposed Project would result in a less than significant impact upon archaeological resources since the Project Site has been subject to past ground disturbing activities; and based on cultural resources records search conducted by the South Central Coastal Information Center (SCCIC), no known archaeological resources have been recorded within the Project Site. Nevertheless, the proposed Project would implement Mitigation Measures CUL-MM-1 through CUL-MM-3, which would reduce Project impacts on archaeological resources to a less than significant level if any archaeological resources are found during the construction phase. It is anticipated that the Mixed-Use Podium Alternative would create similar impacts to archaeological resources, since the construction activities would be similar to the proposed Project. The Mixed-Use Podium Alternative would also implement the same mitigation measures as recommended under the proposed Project. When compared to the proposed Project, this alternative would result in a similar conclusion and would have a less than significant impact to archaeological resources with mitigation.

## m) Biological Resources

The Project Site consists of active commercial businesses and associated plantings of ornamental vegetation. No natural or semi-natural vegetation communities are present on the Project Site; plants present are non-native consisting of ornamental non-native trees and shrubs of several species. No wetland habitat was observed onsite. The Mixed-Use Podium Alternative would be nearly identical to the proposed Project, but with a different architectural design than the proposed Project. The Mixed-Use Podium Alternative would require similar construction and operational activities as the proposed Project. The demolition of the existing conditions for the operation of the Mixed-Use Podium Alternative would not destroy any biological resources. Thus, impacts upon biological resources would be similar to the proposed Project and less than significant under the Mixed-Use Podium Alternative.

## n) Tribal Cultural Resources

As discussed in Section IV.N, Tribal Cultural Resources, there is no evidence of any known tribal cultural resources to be recorded on the Project Site. Considering the information available on Native American settlement patterns for the Glendale Narrows, historical disturbances, and soil data for the Project Site, SWCA concluded the Project Site was found to have a low sensitivity for containing unidentified tribal cultural resources. With incorporation of a one-day spot-check field consultation by the Gabrieleño Band of Mission Indians (see TCR-PDF-1), impacts upon inadvertent finds of tribal cultural resources would be less than significant.

The Mixed-Use Podium Alternative would involve the same levels of earthwork and grading activity as the proposed Project. As such, this alternative would incorporation the same project design feature (TCR-PDF-1) to ensure impacts associated with inadvertent fonds are reduced to less than significant levels. Similar to the proposed Project, the Mixed-Use Podium Alternative would result in less than significant impacts upon Tribal Cultural Resources.

## o) Energy Conservation

### *(a) Electricity*

As discussed in Section IV.O, Energy, the estimated net increase in electricity consumption by the proposed Project would be approximately 1,337,720 kilowatt hours per year (kWh/year). As shown in Table V.F-12, below, the estimated net increase in electricity consumption by the Mixed-Use Podium Alternative would be approximately 1,337,720 kWh/year, which is the same energy use as the proposed Project.

**Table V.F-12**
**Estimated Electricity Demand by Mixed-Use Podium Alternative**

| Land Use | Size | Total Electricity Demand (kWh/year)[a] |
|---|---|---|
| **Existing Land Uses** | | |
| General Light Industrial | 117,000 sf | 1,298,700 |
| **Existing Electricity Demand:** | | **1,298,700** |
| **Mixed-Use Podium Alternative Uses** | | |
| Multi-Family Residential | 419 du | 1,698,470 |
| Office | 19,000 sf | 246,810 |
| Restaurant | 3,000 sf | 132,420 |
| Parking Structure | 562 spaces | 558,720 |
| **Total Reduced Density Alternative Electricity** | | **2,636,420** |
| *Less Existing Electricity Demand:* | | *-1,298,700* |
| **NET TOTAL Electricity Demand:** | | **1,337,720** |

*Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour*
*[a] California Emissions Estimator Model (CalEEMod)v.2016.3.2, Existing Conditions Annual Emissions Worksheets See Appendix N, Project Alternatives AQ and GHG Modeling Worksheets).*
*Source: Parker Environmental Consultants, 2019.*

Similar to the proposed Project impacts, the projected increase in electrical demand due to the Mixed-Use Podium Alternative would not have an adverse impact on its electrical system. Energy supplies are adequate to serve the Mixed-Use Podium Alternative and the installation of needed new infrastructure would not be expected to result in any

significant secondary environmental effects. As such, the Mixed-Use Podium Alternative would meet Title 24 energy efficiency requirements and further reduce demand for electricity under this Alternative. Because the Mixed-Use Podium Alternative would demand the same amount of energy as the proposed Project, impacts would be similarly less than significant.

*(b) Natural Gas*

The proposed Project's net natural gas demands are estimated to be approximately 3,372,230 kbtu/year, or approximately 275,509 cubic feet cf/month. As shown in Table V.F-13, below, the estimated net increase in natural gas demands by the Mixed-Use Podium Alternative would be approximately 275,509 cf/month, which is the same as the natural gas demand of the proposed Project. Similar to the proposed Project, it is not anticipated that any natural gas distribution infrastructure or facilities would be constructed or expanded as a result of the Mixed-Use Podium Alternative. Both the proposed Project and the Mixed-Use Podium Alternative would require local infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts associated with utility upgrades or additional connections would be temporary in nature, and thus would result in less than significant impacts upon the environment. Therefore, impacts associated with natural gas consumption under this Alternative would be less than significant and reduced compared to the proposed Project.

**Table V.F-13**
**Estimated Natural Gas Demand By Mixed-Use Podium Alternative**

| Land Use | Size | Natural Gas Demand Rate (kbtu/year) [a] | Total Natural Gas Demand (cf/month) [b] |
|---|---|---|---|
| **Mixed-Use Podium Alternative** | | | |
| Multi-Family Residential | 419 du | 4,599,860 | 375,806 |
| Office | 19,000 sf | 197,790 | 16,159 |
| Restaurant | 3,000 sf | 692,280 | 56,559 |
| **Total Mixed-Use Podium Natural Gas Demand:** | | **5,489,930** | **448,524** |
| *Less Existing Natural Gas Demand [b]:* | | -2,117,700 | *-173,015* |
| **NET TOTAL Natural Gas Demand:** | | **3,372,230** | **275,509** |

*Notes: sf =square feet; du = dwelling unit*
[a] *California Emissions Estimator Model (CalEEMod) v.2016.3.2, Proposed Project Annual Emissions Worksheets See Appendix N, Project Alternatives AQ and GHG Modeling Worksheets).*
[b] *1 cubic feet (cf) of natural gas = 1.02 kBtu.*
*Source: Parker Environmental Consultants, 2019.*

*(c) Transportation Energy*

The proposed Project's net transportation energy consumption is estimated to be approximately 455,572 gallons of gasoline per year. Since the Mixed-Use Podium Alternative would not include the urban farm, the estimated net demand in transportation energy by this Alternative would reduced compared to the proposed Project. Similar to the proposed Project, it is anticipated that the Mixed-Use Podium Alternative would be a small fraction of the available oil in California. As such, the gasoline consumption associated with this Alternative's vehicle trips during both construction and operation would represent a negligible amount of oil compared to the total amount of oil supplied to California. Additionally, vehicles are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would reduce transportation fuel consumption. Therefore, the Mixed-Use Podium Alternative's impacts associated transportation energy consumption and demand would result in less than significant impacts upon the environment. Therefore, impacts associated with transportation energy consumption under this Alternative would be less than significant and reduced compared to the proposed Project.

## i. Relationship of the Mixed-Use Podium Alternative to the Project Objectives

Under the Mixed-Use Podium Alternative, the same land uses as the proposed Project would be developed, but without the 42,000 square-foot urban farm. Therefore, the Mixed-Use Podium Alternative would meet almost all of the Project objectives listed above and in Section II, Project Description. Specifically, the only objective the Mixed-Use Podium Alternative would not meet is to:

- Support a growing demand for ecologically sensitive urban farming operations through the provision of an urban farm.

Since the Mixed-Use Podium Alternative would not include the urban farm, it would not meet this objective. However, the Mixed-Use Podium Alternative would achieve greater land use compatibility between uses on the Project Site and nearby existing and proposed recreational, residential, and school uses. Additionally, the Mixed-Use Podium Alternative would provide needed housing and create new jobs in the area. As such, the Mixed-Use Podium Alternative would generally meet almost all of the identified Project objectives.

# V. Alternatives

## G. Environmentally Superior Alternative

Section 15126.6 of the State CEQA Guidelines requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. As discussed in this chapter, the environmentally superior alternative would be the No Project Alternative. The No Project Alternative would eliminate the proposed Project's significant and unavoidable impacts related to two significantly impacted roadway intersections (Riverside Drive/ Fletcher Drive and San Fernando Road/Fletcher Drive), residential cut through traffic on Carillion Street, La Clede Avenue and Larga Avenue (although current traffic flow patterns would continue), and associated roadway noise impacts on these three residential street segments. The No Project Alternative would not achieve any of the Applicant's stated Project Objectives, as it would maintain the status quo.

However, as required by CEQA, when the No Project Alternative is shown to be environmentally superior over the proposed Project, a separate Environmentally Superior Project Alternative shall be identified among the alternatives analyzed within the EIR. Based on a review of the project alternatives identified in this EIR, none of the alternatives would be effective in eliminating the Project's significant and unavoidable VMT impacts and roadway noise impacts upon the three identified residential street segments. Table V.F-1, Environmentally Superior Alternative Matrix presents a summary of the impact conclusions for each alternative relative to the impact statements for each impact areas evaluated in the EIR for the proposed Project. While it is anticipated that none of the alternatives would reduce the significant unavoidable impacts generated by the proposed Project, the Reduced Density (1.5:1 FAR) Alternative would be effective in reducing vehicle trips that contribute to the traffic and roadway noise impacts. As compared to the proposed Project, the Reduced Density (1.5:1 FAR) Alternative would generate fewer daily trips than the proposed Project (1,863 trips compared to the proposed Project's 2,551 trips), fewer AM peak hour trips than the proposed Project (146 trips compared to 199 trips), and fewer PM peak hour trips than the proposed Project (174 trips compared to 239 trips). While this reduction in trips would not eliminate or avoid the significant VMT impacts or noise impacts along roadway segments, the reduction in trips would be advantageous from an environmental perspective. The reduction in trips would also serve to further reduce the Project's less than significant impacts associated with air quality, and greenhouse gas emissions. For these reasons, the Reduced Density (1.5:1 FAR) Alternative was identified as the Environmentally Superior Alternative.

**Table V.G-1**
**Alternative Comparative Impact Matrix**

| Environmental Impacts | Proposed Project | No Project Alternative | Reduced Density (1.5:1 FAR) Alternative | Commercial Office Alternative | Residential Alternative | Mixed-Use Podium Alternative |
|---|---|---|---|---|---|---|
| Aesthetics | Less Than Significant | No Impact (increased) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) |
| Air Quality | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (increased) | Less Than Significant (reduced) | Less Than Significant (reduced) |
| Geology and Soils | Less Than Significant | No Impact (reduced) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) |
| Greenhouse Gas Emissions | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (increased) | Less Than Significant (reduced) | Less Than Significant (reduced) |
| Hazardous Materials | Less Than Significant | No Impact (reduced) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) |
| Land Use and Planning | Less Than Significant | No Impact (increased) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) |
| Noise | Significant and Unavoidable | No Impact (reduced) | Significant and Unavoidable (reduced) | Significant and Unavoidable (increased) | Significant and Unavoidable (reduced) | Significant and Unavoidable (reduced) |
| Population and Housing | | | | | | |
| Population | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (increased) | Less Than Significant (reduced) | Less Than Significant (similar) |
| Housing | Less Than Significant | No Impact (increased) | Less Than Significant (increased) | Less Than Significant (increased) | Less Than Significant (similar) | Less Than Significant (similar) |
| Public Services | | | | | | |
| Fire | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (similar) |

| Environmental Impacts | Proposed Project | No Project Alternative | Reduced Density (1.5:1 FAR) Alternative | Commercial Office Alternative | Residential Alternative | Mixed-Use Podium Alternative |
|---|---|---|---|---|---|---|
| Police | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (similar) |
| Schools | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (similar) | Less Than Significant (similar) |
| Parks and Recreation | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (similar) | Less Than Significant (similar) |
| Libraries | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (similar) | Less Than Significant (similar) |
| Public Utilities | | | | | | |
| Water | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) |
| Wastewater | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) |
| Solid Waste | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) | Less Than Significant (reduced) |
| Electric, Natural Gas, and Telecom Infrastructure | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (increased) | Less Than Significant (reduced) | Less Than Significant (similar) |
| Traffic/Transportation | | | | | | |
| Plan Consistency | Less Than Significant | Less Than Significant (increased) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) |
| Household VMT/Capita | Significant and Unavoidable | No Impact (reduced) | Significant and Unavoidable (same) | No Impact (reduced) | Significant and Unavoidable (increased) | Significant and Unavoidable (same) |
| Work VMT/Capita | Significant and Unavoidable | No Impact (increased) | Significant and Unavoidable (increased) | Significant and Unavoidable (increased) | No Impact (reduced) | Significant and Unavoidable (reduced) |

| Environmental Impacts | Proposed Project | No Project Alternative | Reduced Density (1.5:1 FAR) Alternative | Commercial Office Alternative | Residential Alternative | Mixed-Use Podium Alternative |
|---|---|---|---|---|---|---|
| Cultural Resources | Less Than Significant | No Impact (reduced) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) |
| Biological Resources | Less Than Significant | No Impact (reduced) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) |
| Tribal Cultural Resources | Less Than Significant | No Impact (reduced) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) | Less Than Significant (similar) |
| Energy Conservation | Less Than Significant | No Impact (reduced) | Less Than Significant (reduced) | Less Than Significant (increased) | Less Than Significant (reduced) | Less Than Significant (similar) |
| | | | | | | |

# VI. Other CEQA Considerations

# A. Significant and Unavoidable Impacts

## 1. Introduction

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

## 2. Summary of Significant and Unavoidable Impacts

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the proposed Project would result in significant and unavoidable Project-level impacts related to vehicle miles traveled (VMT) impacts for both Household VMT per Capita and Work VMT per Employee, and roadway noise on local street segments. In addition, the proposed Project would result in significant and unavoidable cumulative impacts related to cumulative construction noise and cumulative roadway noise. All other impacts associated with the Project would be less than significant or reduced with mitigation to less than significant.

### a) Operational Transportation and Traffic

Under LADOT's VMT Calculator Tool methodology, the proposed Project is expected to generate a net increase of 2,539 daily trips. The proposed Project would result in a Household VMT per Capita of 12.7 compared to the threshold of 7.2. The proposed Project would result in a Work VMT per Capita of 14.9 compared to the threshold of 12.7. Therefore, the Project would cause significant VMT impacts for both Household VMT and Work VMT. With mitigation, the Household VMT per Capita would be reduced to 10.5 compared to the threshold of 7.2, and the Work VMT per Capita would be reduced to 14.2 compared to the threshold of 12.7. As such, the proposed Project's VMT impacts would remain significant and unavoidable.

## b) Noise

### (1) Roadway Noise

Under the Existing With Project conditions two of the local neighborhood streets would experience roadway noise level impacts that exceed the ambient predicted noise level by more than 5 dBA CNEL, resulting in a significant roadway noise impact. Larga Avenue (between Fletcher Drive and Carillon Street) would experience an approximate 5.7-dBA CNEL increase, which is 0.7 dBA CNEL above the threshold. La Clede Avenue (between Fletcher Drive and Carillon Street) would experience an approximate 7.2-dBA CNEL increase, which is 2.2 dBA CNEL above the threshold. As such, the Project's roadway noise impacts at the Larga Avenue and La Clede Avenue street segments would be considered significant.

Under the Future With Project Scenario, the same two local streets would experience roadway noise level impacts that exceed the ambient predicted noise level by more than 5 dBA CNEL, resulting in a significant impact. As such, the Project's roadway noise impacts at the Larga Avenue and La Clede Avenue street segments would be considered significant.

No feasible mitigation measures have been identified to effectively mitigate the significant operational roadway noise impacts that are projected to occur. Measures, such as speed humps, curb extensions, and bulbouts, could be employed to slow down traffic. However, they would be unlikely to divert any traffic. Speed humps would also have the undesirable effect on increasing noise on local streets. As such, these measures would be ineffective in addressing the Project's roadway noise impacts and are not recommended.

### (2) Cumulative Impacts

#### *(a) Construction Noise*

Construction of the proposed Project, in combination with related projects, would result in an increase in construction-related noise and vibration in this already urbanized area of the City. Related Project 10, which is located approximately 700 feet to the east of the Project Site at 2910 W. San Fernando Road, may have concurrent construction activities that overlap with the proposed Project, and thus may impact the Los Feliz Charter School that is located between these two projects. While the proposed Project's construction noise levels would be less than significant as an isolated project, the combined noise levels from two concurrent project sites within 500 feet of a sensitive receptor would have the potential to increase ambient noise levels by more than 5 dBA. As such, impacts associated with cumulative construction noise would be potentially significant if

concurrent construction activities occur. The project-related on-site cumulative construction noise impact would, therefore, be considered potentially significant.

*(b) Roadway Noise*

As discussed above, Future With Project cumulative roadway noise levels would increase by a maximum of 5.7 dBA CNEL on Larga Avenue (between Fletcher Drive and Carillon Street) and by 7.2 dBA CNEL on La Clede Avenue (between Fletcher Drive and Carillon Street), which would result in a significant impact. Therefore, the cumulative impact associated with off-site operational noise would be significant at these locations.

# 3. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identifying and disclosing a project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines states that where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

The underlying purpose of the Project is to redevelop an underutilized property with a vibrant mixed-use project with residential, creative office, restaurants and an urban farm. As discussed in Section II, Project Description, the proposed Project Objectives are as follows:

- Meet the Community Plan's objective to minimize incompatibilities between residential uses and commercial or industrial use.
    - Achieve greater land use compatibility by replacing existing light industrial uses with uses more compatible with nearby existing and proposed recreational, residential, and school uses, as well as the Los Angeles River.
    - Resolve the current inconsistency between the Project Site's [Q]PF-1-CDO-RIO zoning and its Heavy Manufacturing land use designation under the Community Plan.
- Promote the development of the RIO District by enhancing the visual appearance of and character of the Project Site with well-designed buildings and landscaping.
- Promote and support pedestrian activity along the Los Angeles River and enhance pedestrian access between the Los Angeles River and Casitas

Avenue.

- Address the City's critical housing needs by providing a significant amount of housing, including Very Low Income housing units, in a range of housing types and sizes at a location that does not displace existing housing.

- Reduce vehicle trips and vehicle miles travelled.

    - Develop additional housing stock at an infill location that is close to commercial and recreational amenities, employment opportunities, and schools.

    - Provide a mixed-use project with on-site amenities.

    - Provide restaurant and similar amenities within walking distance of the residential neighborhoods on the other side of SR-2, future park users, and the Los Angeles River.

- Promote fiscal benefits to the City, including economic development, job creation, and increased sales taxes.

    - Support the existing commercial uses along Fletcher Drive and San Fernando Road with development that will bring new customers.

- Support a growing demand for ecologically sensitive urban farming operations through the provision of an urban farm.

Despite the proposed Project's significant and unavoidable traffic and roadway noise impacts, the proposed Project would achieve the stated objectives of the proposed Project. The Project would involve the demolition of an existing and underutilized 117,000-square-foot warehouse/production building and the construction of a new mixed-use development consisting of up to 419 multi-family residential units, approximately 64,000 square feet of commercial space, including a mix of restaurant uses, office space, and a rooftop urban farm, and a multi-story parking structure. The proposed Project would serve to increase the housing stock within the Northeast Community Plan area and City and would do so with a mixed-use project that minimizes incompatibilities between residential uses and commercial or industrial uses. Furthermore, the Project would develop residential, commercial office, restaurant uses and an urban farm that would provide short- and long-term employment opportunities, improve the Project area's tax base, and generate transient occupancy taxes for the City. Overall, the Project presents numerous benefits that override the limited adverse effects it may have on the environment.

# VI. General Impact Categories

# B. Growth Inducing Impacts

Section 15126.2(d) of the State CEQA Guidelines requires a discussion of the ways in which a proposed project could be growth-inducing. This would include ways in which the project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) requires an EIR to:

> *"Discuss the ways in which the proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects that would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed growth in any area is beneficial, detrimental, or of little significance to the environment."*

The Proposed Project would construct and operate a mixed-use project with 419 multi-family dwelling units and 64,000 square feet of commercial floor area consisting of 19,000 square feet of office space, 3,000 square feet of restaurant space, and a 42,000 square foot urban farm, with an estimated buildout year of 2023. The 419 multi-family dwelling units are anticipated to create 1,090 new residents in the Northeast Los Angeles Community Plan area. The Proposed Project's population growth represents approximately 0.18 percent of the total population growth anticipated to occur within the City of Los Angeles between 2012 and 2040, as stated in SCAG's 2016-2040 RTS/SCS. On a regional scale, the Proposed Project represents only 0.04 percent of the growth that is expected to occur in the SCAG region between 2012 and 2040. The 1,090 new residents anticipated to be generated by the Proposed Project would result in a negligible increase in the City's population growth forecast, and would be within SCAG's regional population growth projection.

With respect to employment during operation of the Proposed Project, the 64,000 square feet of commercial uses would generate a need for approximately 140 new employees, but an overall net decrease of approximately 64 employees when considering the existing

activities. These employment opportunities would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who generally do not locate their households due to such employment opportunities. As such, the commercial component of the Proposed Project would be unlikely to create an indirect demand for additional dwelling units in the area. Therefore, the potential growth associated with Proposed Project's employees would be less than significant.

The Project Site is located in an infill property and is adequately supported by existing roadways and is already served by existing infrastructure associated with sewer systems, potable water delivery systems, electricity, and natural gas. Additionally, the Project Site is adequately served by public services including fire, police, schools, parks, and libraries and would not generate the need for additional services or service provider infrastructure to serve the Project Site. Based on the environmental findings presented in Sections IV.I, Public Services, and Section IV.J, Public Utilities, the Proposed Project would result in a less than significant impact with respect to growth inducing impacts.

# VI. General Impact Categories

# C. Significant and Irreversible Environmental Changes

Section 15126.2(c) of the State CEQA Guidelines states:

> *"Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses…Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."*

The Proposed Project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during construction of the Proposed Project and would continue throughout its operational lifetime. The development of the Proposed Project would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the Project Site.

Construction of the Proposed Project would require consumption of resources that are not replenishable or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics), and water. Fossil fuels, such as diesel, gasoline and oil, would also be consumed in the use of construction vehicles and equipment. As discussed in Section IV.O, Energy, construction of the proposed Project would consume approximately 209,392 gallons of transportation fuel, including approximately 78,675 gallons of diesel and 130,717 gallons of gasoline.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the Proposed Project. However, the consumption of natural resources associated with the Proposed Project would be of a relatively small scale and would be

consistent with regional and local growth forecasts in the City of Los Angeles and the Southern California region as a whole.

Construction and operation of the Proposed Project would result in the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources in the future. However, as discussed in Section IV, Environmental Impact Analysis, of this Draft EIR, while the commitment of such resources could potentially result in both primary and secondary impacts, the Proposed Project's use of nonrenewable resources would be on a relatively small scale and consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions. Therefore, although irreversible environmental changes would result from the Proposed Project, such changes would be considered less than significant.

# VI. General Impact Categories

# D. Effects Not Found to be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the proposed Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the proposed Project would not have the potential to cause significant impacts related to aesthetics (scenic vistas, scenic resources within a designated scenic highway), agricultural and forestry resources; biological resources, historic resources, hazards and risk of upset (safety hazards within two miles of a public airport or in the vicinity of a private airstrip, wildland fires), hydrology and water quality, land use (division of an established community), mineral resources, noise (exposure of people to excessive noise within two miles of an airport or private airstrip), housing displacement, and traffic (air traffic patterns). An abbreviated summary of the analyses provided in Appendix A for these issue areas is provided below.

## (1) Aesthetics

The Project Site is currently developed with an approximately 117,000 square foot light manufacturing/warehouse/film production building and paved surface parking. The Project Site sits adjacent to the concrete-lined Los Angeles River flood control channel and is situated on a relatively level development pad. There are no available views of the Los Angeles River through the Project Site, as such views are blocked by an existing raised earthen berm. Views through the Project Site to the mountains to the west are blocked by the existing 117,000 square foot light manufacturing/warehouse/film production building. Views through the Project Site to the mountains to the northeast are blocked by the elevated Glendale Freeway. There are no scenic resources located on the Project Site. As noted in response to Checklist Question V, Cultural Resources in the Initial Study (see Appendix A to this EIR) and summarized below, there are no historic resources on the Project Site. Furthermore, the Project Site is not located adjacent to or within the viewshed of a designated scenic highway.[1] As discussed in response to

[1] *City of Los Angeles General Plan, Mobility Plan 2035, Appendix B, Inventory of Designated Scenic Highways and Guidelines.*

Checklist Question IV, Biological Resources, there are no protected tree species on the Project Site. Thus, no impact would occur with respect to the potential to cause an adverse effect upon a scenic resource or the potential to substantially damage scenic resources.

### (2) Agriculture and Forestry Resources

The Project Site is completely developed with a light industrial building and a surface parking lot. The Project Site is additionally located in an area zoned for public facilities and industrial land uses. The Project Site and the surrounding area are not currently used for any agricultural-related uses. Therefore, the Proposed Project would have no impact associated with the conversion of agricultural uses or forested lands to a non-agricultural use. As such, no further analysis of this issue is required.

### (3) Biological Resources

The Initial Study Checklist (See Appendix A to this Draft EIR) concluded that impacts upon biological resources would be less than significant. In response to comments received on the NOP, the issue of biological resources was added to the scope of the EIR and a biological resources assessment was prepared (see Section M, Biological Resources). Based on a general biological site reconnaissance conducted in June 2017 for the proposed Project, no special-status species or habitats (e.g., roosting habitat for bats or native birds) occur or have potential to occur on the Project Site due to the heavily developed nature of the site, the absence of natural vegetative communities, and the overall lack of substantial ornamental canopy. As no special-status species or habitats occur or are expected to occur at the Project site, the Project would not result in the loss of individuals or the reduction of existing habitat for listed or otherwise special-status species.

The yellow warbler was observed within the adjacent segment of the Los Angeles River but was not observed within the Project Site boundaries. Because this off-site segment of the Los Angeles River is already highly disturbed and subject to substantial noise due to its proximity to SR-2 and light due to adjacent existing development, no additional impacts to the yellow warbler associated with the Project are expected to occur during Project construction or operation.

No riparian habitat or other sensitive natural communities exist on the Project Site; therefore, the Project would not result in the alteration of an existing wetland habitat. While the Project Site is adjacent to the Los Angeles River, which supports limited areas of native riparian habitat, Project construction or operation would not impact any areas of riparian habitat either directly through grading or indirectly through light or noise as the areas of riparian habitat are approximately 250 to 275 feet from the Project Site.

It is anticipated that all 55 non-protected trees that occur on-site would be removed during the construction of the proposed Project. Project Design Feature BIO-PDF-1 requires the proposed Project to replace all significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project Site proposed for removal with a 1:1 ratio. Project Design Feature BIO-PDF-2 requires a qualified biologist monitor to review landscaping and irrigation systems that are adjacent to the replacement trees to determine whether such landscaping and irrigation systems are compatible for the survival of the replacement trees. As the Project Site supports limited amounts of ornamental vegetation, there is at least limited potential for impacts to nesting by common species of avifauna that would be regulated pursuant to the Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5 and 3513 of the California Fish and Game Code. Project Design Feature BIO-PDF-4 would be implemented to ensure compliance with the MBTA and ensure avoidance of impacts to nesting birds. Compliance with existing laws and incorporation of the Project Design Features identified in Section M, Biological Resources, would ensure impacts upon biological resources are less than significant.

### (4) Cultural Resources (Historic Resources)

The existing building on-site was constructed in 1999, approximately 17 years ago. According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS) and the Los Angeles Historic Resources Inventory, neither the Project Site nor the building on-site is identified on any historic resource lists or databases. Further, a database search of the California Historical Resources Information System (CHRIS), conducted by the South Central Coastal Information Center (SCCIC) indicates that there are no known historical resources within the Project Site.[2] Since the existing building on-site was constructed in 1999, and results from ZIMAS and Los Angeles Historic Resources Inventory and the CHRIS database searches indicate that the existing site or building are not identified as an historic resources or cultural landmark, no impact to historic resources would occur.

### (5) Hydrology and Water Quality

As required under the National Pollution Discharge Elimination System (NPDES), the Proposed Project would be responsible to prepare a Storm Water Pollution Prevention Plan (SWPPP) and implement best management practices (BMPs) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The Project Site is located adjacent to the Los Angeles River Flood

[2] *South Central Coastal Information Center (SCCIC), California State University, California Historical Resources Information System (CHRIS), Records Search Results for the Bow Tie Yard Lofts Project October 6, 2016. (See Appendix B to the Initial Study, contained in Appendix A to the EIR)*

Control Channel and, as such, has the potential to impact the quality of surface water runoff during construction and operation. Although the Project Site is currently developed with an approximate 117,000 square foot light manufacturing/ warehouse building and paved surface parking areas, construction of the project has the potential to alter the quantity and quality of surface water flows. With Implementation of SWPPP and compliance with the NPDES and City discharge requirements, and the City of Los Angeles's Low Impact Development (LID) Ordinance (No. 181899), impacts to water quality standards and requirements would be less than significant, and no mitigation measures would be required.

Preliminary geological research shows that historic high groundwater on-site is approximately 25 feet below grade. The Proposed Project includes surface earthwork activity to ensure the proper base and slope for the proposed buildings. The Proposed Project would only include above grade levels. Therefore, the Proposed Project would not interfere with groundwater on-site. Additionally, the Project Site is largely impervious and existing water runoff is directed toward surrounding stormwater infrastructure. Therefore, the development of the Proposed Project would not interfere with groundwater recharge. The Proposed Project would not have the potential to deplete groundwater supplies or interfere with groundwater recharge. A less than significant impact would occur, and no further analysis is required on this issue.

There are no natural watercourses on the Project Site, and the Project Site is approximately 100 percent impervious. Runoff from the Project Site is currently and would continue to be collected on the Project Site and directed towards existing storm drain inlets in the Project vicinity. There are no known deficiencies in the local stormwater system. The Proposed Project would reduce the amount of impervious surfaces on the Project Site. Therefore, development of the Proposed Project would not increase site runoff or result in any changes to the local drainage patterns. The Proposed Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Proposed Project. Further, the Proposed Project would be required to implement an LID Plan (during the Project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater best management practices to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Additionally, because the current onsite building and parking lots were developed prior to current LID requirements and do not currently operate under a SUSMP, the implementation of operational BMPs would improve the quality of stormwater runoff from the Project Site when compared to existing conditions. Therefore, the Proposed Project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site.

The City of Los Angeles General Plan Safety Element indicates that the Project Site is located within a potential inundation area. However, according to FEMA's Flood Insurance Rate Map, the Project Site is Zone X, which signifies that the Project Site is determined to be outside the 100 and 500 year flood zone.[3] Additionally, the City of Los Angeles Zoning Information and Map Access System (ZIMAS) indicates that floodwater would be contained in storm drains and there is no need to refer to the Bureau of Engineering. Thus, the Project would not place housing within a 100-year flood plain, and the Proposed Project would result in a less than significant impact with respect to flooding and inundation. The Project Site is located more than 15 miles inland from the Pacific Ocean and has a mean sea level of approximately 265 to 370 feet above mean sea level. Furthermore, the Project Site is not within the vicinity of a foothill or hillside area and thus would not be exposed to mudflows. Therefore, no further analysis in the EIR is required.

### (6) Mineral Resources

The Project Site is not located within the mapped boundaries of an oil field or oil drilling area.[4] Although the Project Site is located within a designated mineral resource zone (MRZ-2), mineral extraction activities do not currently exist on the Project Site or in the immediate Project Site area. Thus, the development of the Proposed Project would not result in the loss of availability of a known mineral resource or locally-important mineral resource. As such, the Proposed Project would result in a less than significant impact to mineral resources, and no further analysis of these issues is required.

### (7) Noise (Airports)

Impacts associated with exposure of people to excessive noise levels arising from a public or private use airport was concluded to be less than significant as the Project Site is not located within the vicinity of an airport. The Burbank Bob Hope Airport is the closest airport to the Project Site and is located approximately nine miles from the Project Site. Additionally, there are no private airstrips within the project vicinity. Therefore, no impact would occur, and no further analysis of this issue in the EIR is required.

### (8) Population and Housing (Displacement)

The Proposed Project would include the demolition of the existing light manufacturing building and the construction of a mixed-use development. Since neither dwelling units nor residents are currently located on the Project Site, the proposed Project would not

[3] *Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, Panel Number 06037C1610F, September 26, 2008, website: http://dpw.lacounty.gov/wmd/floodzone/, accessed September 2016.*

[4] *City of Los Angeles General Plan, Oil Field and Oil Drilling Areas in the City of Los Angeles. Safety Element, Exhibit E.*

displace any housing or residents and would not necessitate the construction of replacement housing elsewhere. No impact would occur, and no further analysis on this issue in the EIR is required.

### (9) Hazards and Risk of Upset (Wildland Fires)

The Project Site is located in an urbanized area within the City of Los Angeles and is not located in a very high fire hazard severity zone.[5] As such, the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and therefore this issue does not require further analysis in the EIR.

### (10) Land Use and Planning

The Project Site is uniquely located on a property that is encumbered by a number of man-made barriers that separate the site from surrounding neighborhoods. The properties surrounding the Project Site are designated as Commercial Manufacturing, Open Space, and Public Facilities. The Project Site is immediately bordered by a self-storage facility and the Glendale Freeway to the north. The Glendale Freeway also borders the Project Site to the west. The Los Angeles River is located to the south of the Project Site. A Metro-owned railway easement borders the Project Site to the east. These three features limit access to the Project Site area from the surrounding neighborhood. In addition, vehicular access to Project Site area is limited to Casitas Avenue. All development associated with the Proposed Project would be confined to the existing Project Site and would not disrupt or divide the physical arrangement of the established community. Therefore, no further analysis in the EIR is required.

### (11) Transportation and Traffic (Air Traffic Patterns)

As discussed above, the Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. In addition, the Project Site does not currently contain any aviation-related uses and would not include the development of any aviation-related uses. Thus, the proposed Project would have no impact on air traffic patterns, and no further analysis of this issue is required.

### (12) Wildfire

The Project Site is located in an urbanized area within the City of Los Angeles and is not located in a very high fire hazard severity zone. As such, the Proposed Project would not impair an adopted emergency response plan or emergency evacuation plan, exacerbate wildfire risks, require the installation of infrastructure that could exacerbate fire risk, or

[5] *City of Los Angeles Department of City Planning, ZIMAS, http://zimas.lacity.org/, accessed November 9, 2016.*

expose people or structures to significant risks such as downslope or downstream flooding as a result of runoff, post-fire slope instability, or drainage changes. Therefore, this issue does not require further analysis in the EIR.

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# VIII. References and Acronyms

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# 2. ACRONYMS AND ABBREVIATIONS

| | |
|---|---|
| AAM | Annual Arithmetic Mean |
| AB | Assembly Bill |
| AEP | Association of Environmental Professionals |
| AFY | Acre-feet per year |
| ANSI | American National Standard Institute |
| APN | Assessor Parcel Number |
| AQMP | Air Quality Management Plan |
| ASTM | American Society of Testing and Materials |
| ASTs | above-ground storage tanks |
| ATCS | Adaptive Traffic Control System |
| ATSAC | Automated Traffic Surveillance Control |
| Basin | South Coast Air Basin |
| Bgs | below ground surface |
| BMPs | Best Management Practices |
| C/D | construction/demolition |
| CAA | Clean Air Act |
| CAAQS | California ambient air quality standards |
| Cal/EPA | California Environmental Protection Agency |
| CAPCOA | California Air Pollution Control Officers Association |
| CARB | California Air Resources Board |
| CAT | Climate Action Team |
| CBC | California Building Code |
| CCAA | California Clean Air Act |
| CCAR | California Climate Action Registry |
| CCR | California Code of Regulations |
| CDFW | California Department of Fish and Wildlife |
| CDMG | California Division of Mines and Geology |
| CEC | California Energy Commission |
| CEQA | California Environmental Quality Act |
| CERCLIS | Comprehensive Environmental Response, Compensation, and Liability Information System |
| Cf | Cubic feet |
| CFC | Chlorofluorocarbons |
| CGS | California Geological Survey |
| $CH_4$ | Methane |
| CHMIRS | California Hazardous Material Incident Report System |
| CiSWMPP | City of Los Angeles Solid Waste Management Policy Plan |

| | |
|---|---|
| City Zoning Code | City of Los Angeles Planning and Zoning Code |
| CMP | Congestion Management Program |
| CNEL | Community Noise Exposure Level |
| CO | carbon monoxide |
| $CO_2$ | carbon dioxide |
| CO2e | carbon dioxide equivalent |
| COHb | carboxyhemoglobin |
| COPC | Chemical of Potential Concern |
| CORRACTS | Corrective Action Treatment, Storage, and Disposal Facilities |
| CPA | Community Plan Area |
| CPT | cone penetrometer test |
| CPU | Crime Prevention Unit |
| CRA/LA | Community Redevelopment Agency of the City of Los Angeles |
| CWA | Clean Water Act |
| CWC | California Water Code |
| cy | cubic yards |
| dB | decibel |
| dBA | A-weighted decibel scale |
| d/D | flow level |
| DHS | California Department of Health and Services |
| DWP | Department of Water and Power |
| DWR | California Department of Water Resources |
| du | dwelling unit |
| EIR | Environmental Impact Report |
| EMS | Emergency Medical Service |
| EOO | Emergency Operations Organization |
| EPA | Environmental Protection Agency |
| ERNS | Emergency Response Notification System |
| EZ | Los Angeles State Enterprise Zone |
| FAR | Floor Area Ratio |
| FCAA | Federal Clean Air Act |
| FEMA | Federal Emergency Management Agency |
| FHWA | Federal Highway Administration |
| GBCI | Green Building Certification Institute |
| GHG | greenhouse gas |
| gpd | gallons per day |
| gpm | gallons per minute |
| GWP | Global Warming Potential |
| HFC | hydrofluorocarbons |
| HSA | Hyperion Service Area |

| | |
|---|---|
| HTP | Hyperion Treatment Plant |
| HVAC | Heating, Ventilation and Air Conditioning |
| I-5 | Golden State Freeway |
| I-10 | Santa Monica Freeway |
| I-101 | Hollywood Freeway |
| I-110 | Harbor Freeway |
| ISO | Interim Control Ordinance |
| ITE | Institute of Transportation Engineers |
| km | kilometers |
| kV | kilovolt |
| kWh | kilowatt-hours |
| LAA | Los Angeles Aqueduct |
| LABS | Los Angeles Department of Public Works Bureau of Sanitation |
| LADBS | Los Angeles Department of Building and Safety |
| LADOT | Los Angeles Department of Transportation |
| LADRP | Los Angeles Department of Recreation and Parks |
| LADWP | Los Angeles Department of Water and Power |
| LAFD | Los Angeles Fire Department |
| LAMC | Los Angeles Municipal Code |
| LAPD | Los Angeles Police Department |
| LAPL | Los Angeles Public Library |
| LARWQCB | Los Angeles Regional Water Quality Control Board |
| LAUSD | Los Angeles Unified School District |
| LBP | Lead-based paint |
| lbs/day | pounds per day |
| LCFS | Low Carbon Fuel Standard |
| $L_{dn}$ | day-night average noise level |
| LEED | Leadership in Energy and Environmental Design |
| $L_{eq}$ | equivalent energy noise level/ambient noise level |
| LOS | Level of Service |
| LST | localized significance thresholds |
| LUST | leaking underground storage tank |
| LUTP | Land Use/Transportation Policy |
| MBTA | Migratory Bird Treaty Act |
| MCE | Maximum Considered Earthquake |
| MEP | maximum extent practicable |
| Metro | Los Angeles County Metropolitan Transit Authority |
| mgd | million gallons per day |
| mi | miles |
| MPO | Metropolitan Planning Organization |

| | |
|---|---|
| MS4 | medium and large municipal separate storm sewer systems |
| msl | mean sea level |
| mm | millimeters |
| $M_{max}$ | maximum moment magnitude |
| MTA | Metropolitan Transportation Authority |
| MWD | Metropolitan Water District |
| MWh | Mega-Watt hours |
| $N_2O$ | nitrous oxide |
| NAAQS | National ambient air quality standards |
| NFRAP | No Further Remedial Action Planned Sites |
| $NO_2$ | nitrogen dioxide |
| NOP | Notice of Preparation |
| NOx | nitrogen oxides |
| NPDES | National Pollutant Discharge Elimination System |
| NPL | National Priorities List |
| $O_3$ | Ozone |
| OAL | California Office of Administrative Law |
| OPR | Office of Planning and Research |
| Pb | lead |
| PEC | Potential environmental concern |
| PFC | perfluorocarbons |
| PGA | peak horizontal ground acceleration |
| PM | particulate matter |
| $PM_{10}$ | respirable particulate matter |
| $PM_{2.5}$ | fine particulate matter |
| ppd | pounds per day |
| ppm | parts per million |
| PRC | Public Resources Code |
| psi | pounds per square inch |
| PUC | Public Utilities Commission (also see CPUC) |
| PWS | Public water suppliers |
| RCP | Regional Comprehensive Plan |
| RCPG | Regional Comprehensive Plan and Guide |
| RCRA | Resource Conservation Recovery Act |
| RD | Reporting District |
| REC | Recognized Environmental Condition |
| ROG | Reactive Organic Gases |
| RTP | Regional Transportation Plan |
| RWQCB | Regional Water Quality Control Board |
| SB | Senate Bill |

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|---|---|
| SCAB | South Coast Air Basin |
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SCG | Southern California Gas Company |
| SCH | State Clearinghouse |
| sf | square feet |
| $SF_6$ | sulfur hexafluoride |
| SIP | State Implementation Plan |
| SLIC | Spills, Leaks, Investigation and Cleanup |
| $SO_2$ | sulfur dioxide |
| $SO_4$ | sulfates |
| SOx | sulfur oxides |
| SOPA | Society of Professional Archeologist |
| SPT | Standard Penetration Test |
| SR-134 | Ventura Freeway |
| SRA | source receptor area |
| SRRE | Source Reduction and Recycling Element |
| SUD | Supplemental Use District |
| SWAT | Solid Waste Assessment Test |
| SWF/LF | Solid Waste Information System |
| SWFP | Solid Waste Facility Permit |
| SWMP | stormwater management plan |
| SWP | State Water Project |
| SWPPP | Storm Water Pollution Prevention Plan |
| SWRCB | State Water Resource Control Board |
| TAC | Toxic Air Contaminants |
| TDM | Transportation Demand Management |
| TOD | Transit Oriented District |
| TPH | total petroleum hydrocarbons |
| TSD | Treatment, Storage, and Disposal |
| TSP | Transportation Specific Plan |
| ULSD | Ultra Low Sulfur Diesel |
| USEPA/ U.S. EPA | United States Environmental Protection Agency |
| USFWS | United States Fish and Wildlife Service |
| USGBC | United States Green Building Council |
| USGS | U.S. Geological Survey |
| UST | underground storage tank |
| UWMP | Urban Water Management Plan |
| V/C | Volume-to-Capacity |
| VdB | Vibration decibels |

| | |
|---|---|
| VMT | Vehicle Miles Traveled |
| VOC | Volatile Organic Compound |
| WMA | Watershed Management Area |
| WMUDS | Waste Management Unit Database System |
| WSA | Water Supply Assessment |
| µg/m3 | micrograms per cubic meter |
| ZIMAS | Zoning Information and Map Access System |