

CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

### Sustainable Communities Environmental Assessment

### **Enlightenment Plaza Project**

Case Numbers: ENV-2019-5597-SE, ENV-2020-2497-SCEA Related Cases: CPC-2019-5596-GPAJ-ZCJ-SP-SPP, VTT-82798

**Project Location:** 321 N. Madison Avenue [including 317, 327, 333, 339, 345 N. Madison Avenue, 312, 316, 322, 328, N. Juanita Avenue, and 3810, 3812, 3812 <sup>1</sup>/<sub>2</sub>, 3814, 3814 <sup>1</sup>/<sub>2</sub>, 3818, 3820, 3830, and 3838 W. Oakwood Avenue, Los Angeles, CA 90004]

#### Community Plan Area: Wilshire

**Council District:** 13 – Mitch O'Farrell

Project Description: The Proposed Project includes the demolition of three existing commercial buildings formerly used for the commercial operation of a telecommunications company, three existing single-family residential buildings, one surface parking lot, and removal of 4 nonprotected street trees, and the construction, operation, and maintenance of five eight-story multifamily buildings in a Permanent Supportive Housing project consisting of 454 dwelling units ("Proposed Project"). The Proposed Project consists of 100 percent affordable housing for the formerly homeless serving lower-income and target population members, exclusive of the five manager's units. The Proposed Project includes 370 studio units, 71 one-bedroom units, and 13 two-bedroom units. Vehicular access to the Project Site would be provided via one full-access driveway along Madison Avenue, one full-access driveway along Oakwood Avenue, one fullaccess driveway along Juanita Avenue, and a loading/drop-off area along Madison Avenue. Additionally, the Proposed Project would provide 36,580 square feet of interior and exterior open space and 11,772 square feet of resident supportive services space (which includes 5,700 square feet of Case Management service area as well as 6,072 square feet of interior open space equal to 4.7 percent of the projects floor area). The Proposed Project's total floor area would consist of 247,812 square feet of residential space, resulting in a Floor Area Ratio of 2.8:1. The maximum building height is 95 feet above grade.

The Proposed Project would also include the renovation of an existing office building at 3838 Oakwood Avenue and the vacation of portions of Madison Avenue, Juanita Avenue, and Oakwood Avenue to allow for secured and controlled access to the Project Site and the adjacent PATH project, and to provide an opportunity to facilitate transit access and enhance landscaping and open space features. The operation of the project is not dependent upon any future street vacations. The record includes no evidence that any other property owner, or development project in the SNAP has expressed an interest in using the newly proposed Subarea D2 at this time. Therefore, the analysis of amending the SNAP to include this new Subarea D.2 is limited to the project area.

PREPARED FOR: The City of Los Angeles Department of City Planning PREPARED BY: Parker Environmental Consultants, LLC **APPLICANT:** Flexible PSH Solutions [Page left intentionally blank.]

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This Sustainable Communities Environmental Assessment (SCEA) has been prepared pursuant to Section 21155.2 of the California Public Resources Code.

# 1.1 Background Information on Senate Bill 375 and the SCEA

The State of California adopted Senate Bill 375 (SB 375), also known as "The Sustainable Communities and Climate Protection Act of 2008," which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California's greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the State's 18 metropolitan planning organizations to incorporate a "sustainable communities strategy" (SCS) into the regional transportation plans to achieve their respective region's greenhouse gas emission reduction targets set by CARB. Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria; one such CEQA streamlining tool is the SCEA.

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). On April 7, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). For the SCAG region, CARB has set GHG emissions reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035. The 2016-2040 RTP/SCS outlines strategies to meet or exceed the targets set by CARB. By Executive Order, approved June 28, 2016, CARB officially determined that the 2016-2040 RTP/SCS would achieve CARB's 2020 and 2035 GHG emission reduction targets.

SB 375 allows the City of Los Angeles (at times referred to as City), acting as lead agency, to prepare a SCEA as the environmental CEQA Clearance for "Transit Priority Projects" (as described below) that are consistent with SCAG's 2016-2040 RTP/SCS.

# 1.2 Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to qualifying Transit Priority Projects (TPPs). For purposes of projects in the SCAG region, a qualifying TPP is a project that meets the following four criteria (see Public Resources Code §21155 (a) and (b)):

- 1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2016-2040 RTP/SCS;
- 2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
- 3. Provides a minimum net density of at least 20 units per acre; and
- 4. Is within one-half mile of a Major Transit Stop or High-Quality Transit Corridor included in a regional transportation plan.

## 1.3 SCEA Process and Streamlining Provisions

Qualifying TPPs that have incorporated all feasible mitigation measures and performance standards or criteria set forth in the prior applicable EIR (SCAG's 2016-2040 RTP/SCS Program EIR) and that are determined to not result in significant and unavoidable environmental impacts may be approved with a SCEA. The specific substantive and procedural requirements for the approval of a SCEA include the following:

- 1. An initial study shall be prepared for a SCEA to identify all significant impacts or potentially significant impacts, except for the following:
  - a. Growth-inducing impacts, and

b. Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network.

Note: All relevant and applicable 2016-2040 RTP/SCS Program EIR mitigation measures shall be incorporated into the Project prior to conducting the initial study analysis.

- 2. The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.
- 3. The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.
- 4. A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA.

- 5. The SCEA may be approved by the lead agency after the lead agency's legislative body conducts a public hearing, reviews comments received, and finds the following:
  - a. All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, and
  - b. With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:
    - i. Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.
    - ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- 6. The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

# 1.4 Required Findings

The City of Los Angeles has determined that the proposed Transit Priority Project may be reviewed through a SCEA:

- The Proposed Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG);
- The Proposed Project qualifies as a Transit Priority Project (TPP) pursuant to Public Resources Code Section 21155(b);
- The Proposed Project is a residential project as defined by Public Resources Code Section 21159.28(d);
- 4. The Proposed Project, as mitigated, incorporates all relevant and feasible mitigation measures, performance standards, or criteria set forth in the prior environmental reports, including SCAG's RTP/SCS Program Environmental Impact Report;
- 5. All potentially significant or significant effects required to be identified and analyzed pursuant to the CEQA have been identified and analyzed in an initial study; and

6. The Proposed Project, as mitigated, either avoids or mitigates to a level of insignificance all potentially significant or significant effects of the Proposed Project required to be analyzed pursuant to CEQA.

Therefore, the City of Los Angeles finds that the Proposed Project complies with the requirements of CEQA for using a SCEA as authorized pursuant to Public Resources Code Section 21155.2(b). The attached Section IV, Environmental Impact Analysis, has been prepared by the Parker Environmental Consultants on behalf of the Project Applicant and in conjunction with the City of Los Angeles, as Lead Agency in support of this SCEA.

# 1.5 Organization of the SCEA

This SCEA is organized into nine sections as follows:

<u>Section I. Introduction:</u> This section provides an overview of the SCEA and CEQA process.

<u>Section 2. Executive Summary/SCEA Environmental Determination:</u> This section provides Proposed Project information, identifies key areas of environmental concern, and includes a determination whether the Proposed Project may have a significant effect on the environment.

<u>Section 3. Project Description:</u> This section provides a detailed description of the Project Site location, the existing environmental setting and the Proposed Project, including details involving the proposed land uses, developed floor area, building height, vehicle parking, bicycle parking, open space areas, landscaping, signage, construction activities, and the associated land use entitlement requests.

<u>Section 4. SCEA Criteria and Transit Priority Project Consistency Analysis:</u> This section identifies the Transit Priority Project Criteria and provides an analysis of the Proposed Project's consistency with the SCAG RTP/SCS.

<u>Section 5. 2016-2040 RTP/SCS Program EIR Mitigation Measures:</u> This section identifies all feasible mitigation measures, performance standards, and criteria from the 2016-2040 RTP/SCS Program EIR.

<u>Section 6. Sustainable Communities Environmental Analysis:</u> Each environmental issue identified in the SCEA Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to a less

than significant level. This section also identifies mitigation measures from the 2016-2040 RTP/SCS EIR that are applicable to the Proposed Project.

<u>Section 7. List of Preparers:</u> This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the SCEA.

<u>Section 8. References, Acronyms and Abbreviations</u>: This section provides a list of reference materials and identifies commonly used acronyms and abbreviations that are used throughout the document.

<u>Appendices:</u> This section includes various reference documents, technical reports, and information used in the SCEA.

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### Section 2. Executive Summary / SCEA Environmental Determination

Project Title: Enlightenment Plaza Project

Environmental Case Number: ENV-2019-5597-SE; ENV-2020-2497-SCEA

Related Cases: CPC-2019-5596-GPAJ-ZCJ-SP-SPP-SPR and VTT-82798

**Project Location:** 321 N. Madison Avenue [including 317, 327, 333, 339, 345 N. Madison Avenue, 312, 316, 322, 328, N. Juanita Avenue, and 3810, 3812, 3812 ½, 3814, 3814 ½, 3818, 3820, 3830, and 3838 Oakwood Avenue, Los Angeles, CA 90004]

Community Plan Area: Wilshire

**Council District:** 13 – Mitch O'Farrell

Lead City Agency:	City of Los Angeles Department of City Plannin		
Staff Contact:	Hagu Solomon-Cary 200 N. Main Street, Room 763 Los Angeles CA 90012		
Phone Number:	(213) 978-1361		
Applicant Name and A	dress: Flexible PSH Solution 2102 Century Park La Los Angeles, CA 900	Flexible PSH Solutions, Inc. 2102 Century Park Lane, Suite 413 Los Angeles, CA 90067	
Phone Number:	(213) 248-7185		

General Plan Designation: Limited Manufacturing

Zoning: M1-1

**PROJECT DESCRIPTION:** The Proposed Project would result in the demolition of three existing commercial buildings formerly used for the commercial operation of a telecommunications company, three existing single-family residential buildings, one surface parking lot, removal of 4 non-protected trees, and the construction, operation, and maintenance of five eight-story multi-family buildings in a Permanent Supportive Housing project consisting of 454 dwelling units ("Proposed Project"). The Proposed Project consists of 100 percent affordable housing serving lower-income and target population members, exclusive of the five manager's units. The Proposed Project would include 370 studio units, 71 one-bedroom units, and 13 two-bedroom units. The Proposed Project Site would be provided via one full-access driveway along Madison Avenue, one full-access driveway along Madison Avenue, and a loading/drop-off area along Madison Avenue. Additionally, the Proposed Project would provide 36,580 square feet of interior and exterior open space and 11,772 square feet of resident services space (which includes 5,700 square feet of Case Management service area as well as 6,072 square feet of interior open space equal to 4.7

percent of the projects floor area). The Proposed Project's total floor area would consist of 247,812 square feet of residential space, resulting in a Floor Area Ratio of 2.8:1.<sup>1</sup> The maximum building height is 95 feet above grade. The Project would also include the renovation of an existing 5,663 square-foot two-story office building above a one-level partially subterranean parking garage at 3838 Oakwood Avenue.<sup>2</sup>

The discretionary requests include: (1) A General Plan Amendment from Limited Industrial to Commercial Manufacturing land use designation, (2) A Zone Change from M1-1 (Limited Industrial) to CM-1 (Commercial Manufacturing) and approval of affordable housing incentives in compliance with Measure JJJ for a 20% reduction in open space, the elimination of Section VI.6 of the Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan (SNAP), and to utilize the side yard requirements for the RAS3 zone; (3) A Specific Plan Amendment to create a new subarea within the SNAP to permit Permanent Supportive Housing that includes Restricted Affordable Units with supportive services for formerly homeless, (4) Project Permit Compliance Review, (5) Site Plan Review, (6) Vesting Tentative Tract Map, and (7) approval of a haul route.

Separate stand alone Street Vacation applications may be pursued with the City of Los Angeles for portions of Madison, Oakwood and Juanita Avenues independent of the main entitlements. The future vacation of portions of Madison Avenue, Juanita Avenue, and Oakwood Avenue would allow for secured and controlled access to the Project Site and the adjacent PATH project, and to provide an opportunity to facilitate transit access, and enhance landscaping and open space features. The operation of the project is not dependent upon any future street vacations.

The Proposed Project would also require approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: shoring, grading, foundation, removal of existing street trees, and building and tenant improvements. (For additional detail, see "Section 3. Project Description").

**ENVIRONMENTAL SETTING:** The Project Site includes three assessor's tax parcels (Assessor Parcel No. 5501-001-800, 5501-001-023, and 5501-001-025) that encompasses 94,623 square feet of lot area (2.17 acres). The Project Site is currently occupied by three commercial buildings, three single-family residential buildings, a two-story office building above a one-level partially subterranean parking garage, and a paved surface parking lot. The surrounding properties are developed with residential use (including permanent supportive housing), commercial, and light industrial/manufacturing uses. (For additional detail, see "Section 3. Project Description").

Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.): City of Los Angeles Bureau of Engineering (BOE), Department of Building and Safety, L.A. Sanitation (LASAN), Los Angeles Fire Department (LAFD), Board of Public Works/Department of Urban Forestry, CRA/LA Excess Bond Proceeds from the Wilshire Center/Koreatown Redevelopment Project Area, the Economic and Workforce Development Department, and the Housing and Community Investment Department, Los Angeles County Community Development Commission, and the State Department of Community Development.

<sup>&</sup>lt;sup>1</sup> The Proposed Project proposes 317,743 sf of total floor area, however, Floor Area under Section 10.C of the Subarea D 2 SNAP regulations, excludes areas dedicated to supportive services and common areas.

<sup>&</sup>lt;sup>2</sup> The floor area and lot are of the 3838 Oakwood Avenue lot are not included in the overall calculation of the Proposed Project's FAR.

#### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

<ul> <li>Aesthetics</li> <li>Agriculture and Forestry Resources</li> <li>Hazards &amp; Hazards</li> <li>Air Quality</li> <li>Biological Resources</li> <li>Land Use / Plan</li> <li>Cultural Resources</li> <li>Energy</li> <li>Geology / Soils</li> <li>Population / House</li> </ul>	s Emissions       Public Services         indous Materials       Recreation         er Quality       Transportation/Traffic         ning       Tribal Cultural Resources         ces       Utilities / Service Systems         Wildfire       Wildfire         using       Mandatory Findings of Significance
DETERMINATION (to be completed by Lead Ag On the basis of this initial evaluation:	jency)
I find that the proposed project COULD NOT have a signature of the proposed project COULD NOT have a signature of the proposed.	inificant effect on the environment, and a NEGATIVE
I find that although the proposed project could have a be a significant effect in this case because revisions o project proponent. A MITIGATED NEGATIVE DECLA	a significant effect on the environment, there will not n the project have been made by or agreed to by the ARATION will be prepared.
I find the proposed project MAY have a significant ef IMPACT REPORT is required.	fect on the environment, and an ENVIRONMENTAL
I find the proposed project MAY have a "potentially mitigated" impact on the environment, but at least one document pursuant to applicable legal standards, a based on earlier analysis as described on attached s required, but it must analyze only the effects that remains the standards.	significant impact" or "potentially significant unless effect 1) has been adequately analyzed in an earlier nd 2) has been addressed by mitigation measures heets. An ENVIRONMENTAL IMPACT REPORT is ain to be addressed.
I find that although the proposed project could have potentially significant effects (a) have been analy DECLARATION pursuant to applicable standards, and earlier EIR or NEGATIVE DECLARATION, including upon the proposed project, nothing further is required	a significant effect on the environment, because all zed adequately in an earlier EIR or NEGATIVE d (b) have been avoided or mitigated pursuant to that revisions or mitigation measures that are imposed
I find that the Project is a qualified "Transit Priority Proj and 21155.2 of the Public Resources Code (PRC), an project" that satisfies the requirements of Section 211 have a potentially significant effect on the environment because this Sustainable Communities Environment measures that either avoid or mitigate to a level of effects of the Project.	ect" that satisfies the requirements of Sections 21155 nd/or a qualified "residential or mixed use residential 59.28(d) of the PRC, and although the Project could int, there will not be a significant effect in this case, ental Assessment (SCEA) Initial Study identifies insignificance all potentially significant or significant
Hagu Solomon-Cary, AICP	Senior City Planner
PRINTED NAME	4/27/2020
SIGNATURE	DATE

## 3.1. Project Summary

Flexible PSH Solutions (the "Applicant") proposes the demolition of three existing commercial buildings previously used for the commercial operation of a telecommunications company (totaling 7,881 square feet), three existing single-family residential buildings (totaling 1,518 square feet), and one surface parking lot with 199 parking spaces. The Project includes the renovation of an existing 5,663 square-foot two-story building above a one-level partially subterranean garage, and the construction, operation, and maintenance of five eight-story multi-family buildings in a Permanent Supportive Housing project with 454 dwelling units ("Proposed Project").

The Proposed Project consists of 100 percent affordable housing, exclusive of the five manager's units, serving lower-income and target population members. The Proposed Project includes 370 studio units, 71 one-bedroom units, and 13 two-bedroom units. The Proposed Project provides 23 vehicular parking spaces within a one-level at-grade parking level in three of the five buildings and 227 bicycle parking spaces within a one-level at-grade parking level in all five buildings and 28 bicycle parking spaces along the sidewalk (251 bicycle parking spaces total). Vehicular access to the Project Site is provided via one full-access driveway along Madison Avenue, one full-access driveway along Oakwood Avenue, one full-access driveway along Juanita Avenue, and a loading/drop-off area along Madison Avenue. Additionally, the Proposed Project provides 36,580 square feet of interior and exterior open space and 11,772 square feet (including 5,700 square feet of case management space and 6,072 square feet of interior open space) of resident services space. The Proposed Project's total floor area consists of 247,812 square feet, resulting in a Floor Area Ratio of 2.8:1. The maximum building height is 95 feet above grade.

The Proposed Project's discretionary requests include: (1) A General Plan Amendment from Limited Industrial<sup>3</sup> to Commercial Manufacturing land use designation, (2) A Zone Change from M1-1 (Limited Industrial) to CM-1 (Commercial Manufacturing), (3) A Specific Plan Amendment to create new Subarea D2 with a designation of Commercial Manufacturing/ Permanent Supportive Housing, (4) Project Permit Compliance, (5) Site Plan Review, and (6) A Vesting Tentative Tract Map. Separate stand alone Street Vacation applications may be processed with the City of Los Angeles for portions of

<sup>&</sup>lt;sup>3</sup> The Wilshire Community Plan General Plan Map identifies the site with the land use designation of Limited Industrial. ZIMAS identifies the site with the General Plan land use designation of Limited Manufacturing.

Madison, Oakwood and Juanita Avenues independent of the main entitlements. The Proposed Project would also require approvals and permits from other City of Los Angeles departments, including, but not limited to, the Department of Building and Safety (City agencies and other non-City agencies) for project construction activities including, but not limited to, the following: shoring, grading, hauling, foundation, removal of existing street trees (requires Board of Public Works approval), and building and tenant improvements.

# 3.2. Environmental Setting

### 3.2.1 Project Location

The Project Site is located in the Wilshire Community Plan Area within the City of Los Angeles. The Project Site's location within the City of Los Angeles and the greater Los Angeles region is depicted in Figure 3.1, Project Location Map. The Project Site encompasses three parcels (with 12 lots) and includes approximately 94,623 square feet of gross lot area (2.17 acres). The Project Site is generally bound by Madison Avenue to the east; Oakwood Avenue to the north; and Juanita Avenue to the west. Existing commercial development bounds the Project Site to the south. The Project Site is asymmetrical. The Project Site's property addresses, Assessor's Parcel Numbers (APN), land use and lot area are summarized in Table 3.1, Summary of the Project Site, below.

Address	APN	Existing Land Use	Existing Building Area	Total Lot Area
<ul> <li>312 N. Juanita Avenue</li> <li>316 N. Juanita Avenue</li> <li>322 N. Juanita Avenue</li> <li>328 N. Juanita Avenue</li> <li>317 N. Madison Avenue</li> <li>321 N. Madison Avenue</li> <li>327 N. Madison Avenue</li> <li>333 N. Madison Avenue</li> <li>339 N. Madison Avenue</li> <li>345 N. Madison Avenue</li> <li>310 Oakwood Avenue</li> </ul>	5501-001-800	Commercial	7,881 sf	84,192 sf
3812 Oakwood Avenue 3812 ½ Oakwood Avenue 3814 Oakwood Avenue 3814 ½ Oakwood Avenue	5501-001-023	Single-Family Residential	3 dwelling units 1,518 sf	6,782 sf
3818 Oakwood Avenue 3820 Oakwood Avenue 3830 Oakwood Avenue 3838 Oakwood Avenue	5501-001-025	Commercial	5,663 sf	3,649 sf
		Total	15,060 sf	94,623 sf
Sources: City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org/, accessed May 2019; and Blew & Associates, P.A.				

Table 3.1 Summary of Project Site



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Figure 3.1 Project Location Map Regional access to the Project Site is provided by the Hollywood Freeway (US 101), which borders the Project Site to the north across Oakwood Avenue. Access to and from the freeway is accessible via N. Vermont Avenue. The eastbound freeway off-ramp is located at N. New Hampshire and Rosewood Avenue and provides direct access to N. Vermont Avenue. The westbound freeway off-ramp is located at N. Vermont Avenue approximately 1,000 feet north of Oakwood Avenue. The west bound on-ramp is located at N. Vermont Avenue and Oakwood Avenue (approximately 480 feet north of Beverly Boulevard) and the eastbound on-ramp is located approximately 1,500 feet north of Beverly Boulevard.

Local street access is provided by the grid roadway system surrounding the Project Site. Juanita Avenue, which borders the Project Site to the immediate West, is a two-way street providing one travel lane in the north direction and one travel lane in the south direction. Juanita Avenue is classified as a Local Street in the City's Mobility Plan.<sup>4</sup> Oakwood Avenue, which borders the Project Site to the north, is a two-way street providing one travel lane in each direction in the vicinity of the Project Site. Oakwood Avenue is designated as a Local Street in the City's Mobility Plan. Madison Avenue, which borders the Project Site to the East, is a two-way street providing one travel lane in each direction in the vicinity of ne travel lane in each direction in the vicinity of the Project Site to the East, is a two-way street providing one travel lane in each direction in the vicinity of the Project Site in the City's Mobility Plan. Beverley Boulevard, which is the closest street to the south of the Project Site, is a two-way street providing two travel lanes in each direction. Beverley Boulevard is designated as an Avenue II in the City's Mobility Plan. Street parking is provided along all bordering streets, with some restrictions.

Major arterial roadways that also provide access to the Project Site are Vermont Avenue, which is located approximately immediately 0.1 mile west of the Project Site; and Virgil Avenue, which is located approximately 0.2 mile east of the Project Site. Vermont Avenue is classified as an Avenue I and Virgil Avenue is classified as an Avenue II roadway in the City's Mobility Plan.

<sup>&</sup>lt;sup>4</sup> Based on a January 17, 2020 correspondence from the Bureau of Engineering to the City Planning Department, it is determined that Juanita Avenue functions in the same manner as a Limited Local Street and that the widening of the roadway would not be required to implement the intent of the Mobility Element.

#### High Quality Transit Area

As described above, SB 375 provides streamlining benefits for projects located within one-half mile of a Major Transit Stop<sup>5</sup> or High Quality Transit Corridor.<sup>6</sup> For purposes of identifying such locations, SCAG utilizes the term "High Quality Transit Areas." The Project Site meets the criteria of a HQTA.

The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express. The Project Site's proximity to the Vermont/Beverly Rail Station (within 500 feet to the west) provides transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. The bus lines within a "reasonable walking distance" (approximately one-quarter mile) of the Project include (10, 14, 201, 204, 754, and Metro Rapid 780). The LADOT DASH line (DASH Wilshire Center/Koreatown) runs along Vermont Avenue, with the nearest bus stop located at W. 1<sup>st</sup> Street. Due to its proximity to the aforementioned bus stops and Vermont/Beverly Rail Station, the Project Site is located within a HQTA.

#### **Transit Priority Area**

In 2013, the State of California enacted Senate Bill 743 (SB 743), which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an Infill Site<sup>7</sup> within a Transit Priority Area shall not be considered significant impacts on the environment." Public Resources Code Section 21099(a)(7) defines a "Transit Priority Area" as an area within one-half mile of a Major Transit Stop (i.e., Vermont/Beverly Rail Station) that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." As state law, SB 743 supersedes the aesthetic impact

<sup>&</sup>lt;sup>5</sup> Public Resources Code Section 21064.3 defines "Major Transit Stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."

<sup>&</sup>lt;sup>6</sup> Public Resources Code Section 21155(b) defines "High Quality Transit Corridor" as "a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

<sup>&</sup>lt;sup>7</sup> Public Resources Code Section 21061.3 defines an "Infill Site" as a lot located within an urban area that has been previously developed with qualified urban uses, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

thresholds in the *CEQA Thresholds Guide*, including those established for aesthetics, obstruction of views, shading,<sup>8</sup> and nighttime illumination.

The Project Site is an Infill Site as it is currently developed with several buildings and a surface parking lot. The Project Site is within a Transit Priority Area because it is within one half-mile of a Major Transit Stop.<sup>9</sup> The roadways adjacent to the Project Site are further served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express. The Project Site's proximity to the Vermont/Beverly Rail Station (less than 500 feet) provides transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. The bus lines within a "reasonable walking distance" (approximately one-quarter mile) of the Project include (10, 14, 201, 204, 754, and Metro Rapid 780). The LADOT DASH line (DASH Wilshire Center/Koreatown) runs along Vermont Avenue, with the nearest bus stop located at W. 1<sup>st</sup> Street. Due to its proximity to the aforementioned bus stops and Vermont/Beverly Rail Station, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

# 3.2.2 Existing Conditions

### Zoning

As shown in Figure 3.2, Zoning and General Plan Designations, the Project Site is located in the M1-1 (Limited Industrial) Zone, Height District No. 1. Height District No. 1 does not limit building height, but limits development to an allowable Floor Area Ratio (FAR) of 1.5:1. Residential units are not permitted in the M1 zone unless an existing industrial building is being converted either by way of a conditional use permit process or under the Adaptive Reuse Ordinance. Subarea D allows uses of the CM Zone, except that Projects with hotel, motel, apartment hotel, and residential uses are prohibited. As such, the Applicant is seeking a Zone Change to CM (Commercial Manufacturing) Zone, which allows Qualified Permanent Supportive Housing Projects.

<sup>&</sup>lt;sup>8</sup> CEQA Guidelines Appendix G, which includes a comprehensive list of environmental topics under CEQA, does not expressly list shade and shadow impacts. The L.A. CEQA Thresholds Guide, however, considers shade and shadow impacts to be a type of aesthetic visual character impact under question 1c of Appendix G. The City has issued ZI No. 2452, confirming that SB 743 applies to a project's aesthetic impacts, including shade and shadow impacts.

<sup>&</sup>lt;sup>9</sup> City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed May 2019.



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Currently the SNAP allows the use and area regulations of the CM Zone (LAMC Section 12.17.1) to be applied to all lots in Subarea D, except that projects with residential uses are prohibited. As such, the Applicant is also requesting that the use and area regulations of Section 12.17.1 of the Code (CM Zone) shall apply to all lots in the Subarea D.2, except that residential uses are permitted provided specific requirements are met and the project meets the definition of a Qualified Permanent Supportive Housing Project. See Discretionary Requests, below, for further details.

#### Freeway Adjacent Advisory Notice (ZI-2427)

The Project Site is located approximately 250 feet south of the Hollywood Freeway (U.S. 101). ZI-2427 serves as an advisory notice to the public and applicants of the potential health risks associated with development projects that are located within 1,000 feet of a freeway. Areas within 500 feet of a freeway are known to experience the greatest concentrations of fine and ultrafine particulate matter (PM), a pollutant implicated in asthma and other health conditions.<sup>10</sup> Scientific literature previously focused on impacts to immediately surrounding communities within 500 feet of freeways; however, recent studies have established strong links to negative health outcomes affecting sensitive populations at a distance of 1,000 feet from freeways, (and in some instances, up to one mile). Therefore, the Department of City Planning uses the 1,000 feet boundary, as the distancing threshold, for conservative consideration of risk to the negative effects of air pollution caused by freeway proximity.

ZI-2427 provides design considerations to reduce air pollution exposure and associated health risks. All projects seeking discretionary approval 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. Further, ZI-2427 advises Applicants of Los Angeles Municipal Code (LAMC) Section 99.04.504.6, which requires building air filtration media with a Minimum Efficiency Reporting Value (MERV) of 13, for mechanically ventilated buildings within 1,000 feet of a freeway.

#### Enterprise Zone / Employment and Economic Incentive Program Area (ZI-2347)

Designated by City Council resolution, and approved by the California Department of Commerce, Enterprise Zones receive Federal, State and City economic incentives to stimulate local investment and employment. This is accomplished through tax and regulation relief and improvement of public services. Enterprise Zones are entitled to

<sup>&</sup>lt;sup>10</sup> City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Freeway Adjacent Advisory Notice, Effective September 17, 2018.

special provisions with regards to certain design standards, including parking and height standards.<sup>11</sup>

#### Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking (ZI-2452)

The Project Site is designated as a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/ Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.<sup>12</sup> ZI-2452 clarifies that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA. However, this law does not limit the ability of the City to regulate, or study aesthetic related impacts pursuant to other land use regulations found in the Los Angeles Municipal Code (LAMC), or the City's General Plan, including specific plans. For example, DCP staff would still need to address a project's shade and shadow impacts if it is expressly required in a specific plan, Community Design Overlays (CDOs), or Historic Preservation Overlay Zones (HPOZs).

### Federal Opportunity Zone

The Project Site is located within a designated Opportunity Zone. Opportunity Zones were introduced in the Tax Cuts and Jobs Act, which President Donald J. Trump signed into law in December of 2017. Opportunity Zones are economically distressed communities located in urban, rural, suburban, and tribal areas. Opportunity Zones are designed to spur economic development and encourage job creation in distressed communities by providing tax benefits to investors. An Opportunity Zone is defined by the Internal Revenue Service (IRS) as "an economically distressed community where new investments, under certain conditions, may be eligible for preferential tax treatment. Localities qualify as Opportunity Zones if they have been nominated for that designation by the State and that nomination has been certified by the Secretary of the U.S. Treasury via his delegation of authority to the Internal Revenue Service."

### LA Promise Zone

The Promise Zone program is President Obama's signature anti-poverty initiative. The LA Promise Zone Initiative, led by Mayor Garcetti, is a collective impact project involving leaders from government, local institutions, non-profits and community organizations to

<sup>&</sup>lt;sup>11</sup> City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2374, Enterprise Zone / Employment and Economic Incentive Program Area (EZ), accessed May 2019.

<sup>&</sup>lt;sup>12</sup> City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, accessed May 2019.

target resources to create jobs, boost public safety, improve public education and stimulate better housing opportunities for our residents and neighborhoods.

The LA Promise Zone is comprised of five ethnically and linguistically diverse neighborhoods based in Central Los Angeles – Hollywood, East Hollywood, Pico-Union, Westlake and Wilshire Center. The LA Promise Zone is home to approximately 165,000 residents, of whom 35% live in poverty (compared to 20% city-wide), and has alarming high school dropout rates, high unemployment, and a shortage of affordable housing. The LA Promise Zone's four four strategic goals are to: (1) Create economic opportunity, (2) Improve educational outcomes, (3) Make our neighborhoods safe, and (4) Build equitable, livable and sustainable communities.

### Transit Oriented Communities

The Project Site is located in a Tier 4 Transit Priority area. Pursuant to the voter-approved Measure JJJ, LAMC Section 12.22 A.31 was added to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program (TOC Program). The Measure required the Department of City Planning to create TOC Affordable Housing Incentive Program Guidelines (*TOC Guidelines*) for all Housing Developments located within a one-half mile radius of a Major Transit Stop. These Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC Program consistent with LAMC 12.22 A.31.

### **General Plan Land Use Designations**

### Wilshire Community Plan

The Project Site is located within the Wilshire Community Plan (Community Plan) area of the City of Los Angeles and is designated for Limited Industrial land uses. The Wilshire Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work and invest in the community. By serving to guide development, the Community Plan encourages progress and change within the community to meet anticipated needs and circumstances, promotes balanced growth, builds on economic strengths and opportunities while protecting the physical, economic, and social investments in the community to the extent reasonable and feasible. The Community Plan Area contains a pattern of low to medium density residential uses within areas of higher density residential uses. Commercial corridors can be found along arterial streets including Wilshire, Pico, La Cienega, Western Avenue, and Vermont Avenue.<sup>13</sup>

As stated in Chapter 3 – Land Use, of the General Plan Framework Element, "it is the intent of the General Plan Framework Element to preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job

<sup>&</sup>lt;sup>13</sup> City of Los Angeles, Wilshire Community Plan, accessed May 2019.

opportunities for the City's residents. As indicated in the Economic Development Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. Where such lands are to be converted, their appropriate use shall be the subject of future planning studies. Policies provide for the consideration of a broader array of uses within the industrial zones than has traditionally been acceptable to facilitate the clustering of uses, which may include retail, that support the basic industries or the location of industries in the same area where the waste products of one can be recycled as a resource for another ("industrial ecology") or a campus-like cluster of related uses."

As discussed in further detail below, under Discretionary Requests, the Applicant is seeking a General Plan Amendment from Limited Industrial to Commercial Manufacturing land use designation.

#### Vermont/Western Transit Oriented District (TOD) Station Neighborhood Area Plan Specific Plan

As shown in Figure 3.3, the Project Site is located within the Vermont/Western TOD Station Neighborhood Area Plan Specific Plan (SNAP). The SNAP consists of an area that includes all or parts of the Hollywood and Wilshire Communities and is generally bound by Franklin Avenue to the north; Virgil Avenue to the East; West 3<sup>rd</sup> Street to the South; and Canyon Drive to the West. The intent of the SNAP is to implement the goals and policies of the Hollywood Community Plan, Wilshire Community Plan, City General Plan Framework and Transportation Elements. To assist in implementation of goals and policies, the SNAP area is further divided into subareas grouped by land use elements. The Proposed Project is located within Subarea D and is subject to the area's use restrictions including no hotel, motel, apartment hotel, and residential uses.

#### Wilshire Center / Koreatown Redevelopment Project Area

The Project Site is located within the Wilshire Center / Koreatown Redevelopment Project Area. The Wilshire Center/Koreatown Redevelopment Plan, effective December 13, 1995, is valid until December 13, 2025.<sup>14</sup> While AB1X-26 dissolved redevelopment agencies as of October 2011, the land use regulations of the Wilshire Center/Koreatown Redevelopment Plan remain in effect. Pursuant to Ordinance 186,325, the City of Los Angeles will review the Project for compliance with the Wilshire Center/Koreatown Redevelopment Plan.

<sup>&</sup>lt;sup>14</sup> City of Los Angeles Community Redevelopment Agency – Los Angeles, Wilshire Center/Koreatown, website: http://www.crala.org/internet-site/Projects/Wilshire\_Center/workprogram.cfm, accessed May 2019.





Figure 3.3 Vermont/Western Transit Oriented District Station Neighborhood Area Plan Specific Plan Map Within the Wilshire Center/Koreatown Redevelopment Project Area, the Project Site is located within the Limited Industrial area. The Redevelopment Plan's objective for the project area is to, among others, eliminate and prevent the spread of blight and deterioration. Rehabilitation of this area is in part dependent on addressing the economic, social, educational, cultural, and physical well-being of the Wilshire Center / Koreatown population. Provision of low- and moderate-income housing for all income groups and family sizes is an important step towards addressing the goals of the Wilshire Center / Koreatown Redevelopment Project Area. Specialized facilities that address the social needs of the community, such as educational, job training, case management, and counseling programs should be developed in conjunction with new housing. Limitation on type, size, and height of buildings is limited by applicable federal, state, and local statutes, codes, and ordinances.<sup>15</sup>

### **Existing Site Conditions**

Figure 3.4, Aerial Photograph of the Project Site and Surrounding Land Uses, shows an aerial view of the Project Site and identifies the photograph locations for the Project Site and surrounding land use photographs shown in Figure 3.4, Photographs of the Project Site.

The Project Site is currently improved with three one-story commercial buildings with a total of approximately 7,881 square feet of floor area, three single-family dwelling units (1,518 square feet), a 5,663 square-foot two-story office building above a one-level partially subterranean garage, and a surface parking lot, as shown on Figure 3.4 below.

The property at 312-328 Juanita Avenue and 317-345 Madison Avenue is developed with three structures totaling 7,881 square feet that were formerly used for telecommunication purposes by AT&T for administration, vehicle maintenance and storage purposes. This property has been vacant since December 2019. There are three vehicular driveways located along the west side of the Project Site fronting Juanita Avenue and three vehicular driveways located along the east side of the Project Site fronting Madison Avenue.

The property located at 3812-3814 Oakwood Avenue is developed with three single family dwelling units totaling 1,518 square feet. Access to this property is provided via one driveway from Oakwood Avenue.

The property located at 3838 Oakwood Avenue is developed with a 5,663 square-foot two-story office building above a one-level partially subterranean garage. This property is

<sup>&</sup>lt;sup>15</sup> Ibid.

located within the Project Site for purposes of the SCEA analysis but is not within the proposed Vesting Tentative Tract Map.

Vegetation on the Project Site is minimal as the site is primarily improved with residential and commercial structures and ancillary paved surface parking areas. Based on information presented in the Tree Report, dated March 24, 2020, there are no trees within the Project Site that are considered protected under the City of Los Angeles Native Tree Protection Ordinance (Ord. 177,404). There are three (3) non-protected significant trees within the Project Site and four (4) street trees within the public right-of-way adjacent to the Project Site on Oakwood Avenue.<sup>16</sup>

### Surrounding Land Uses

As shown in Figure 3.2, the properties immediately bordering the Project Site to the east and south are zoned M1 with a Limited Manufacturing General Plan land use designation. The properties bordering the property to the west are zoned R4, CM, and C2 with a Neighborhood Commercial General Plan land use designation.<sup>17</sup> The properties bordering the Project Site to the North are zoned PF-1XL with a Public Facilities General Plan land use designation. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 3.5, Photographs of Surrounding Uses, Views 7 through 12. Figure 3.4 shows an aerial photograph of the uses surrounding the Project Site. Below is description of the existing conditions in the surrounding area.

- North: The Project Site is immediately bordered by Oakwood Avenue to the north followed by mostly undeveloped land and the on-ramp to the Hollywood Freeway (US-101). A three-story residential rehabilitation center building and a Denny's restaurant are located directly north of the on-ramp, fronting N. Vermont Avenue. These properties and the freeway right-of-way are zoned PF-1XL and have a General Plan land use designation of Public Facilities.
- East: The Project Site is immediately bordered by Madison Avenue to the east. On the east side of Madison Avenue, there is a 190 unit Permanent Supportive Housing development (PATH Metro Villas) and community serving commercial/industrial properties. Both of these developments are zoned M1-1 with a General Plan land use designation of Limited Industrial. Residential uses in conjunction with a

<sup>&</sup>lt;sup>16</sup> The City of Los Angeles Department of City Planning requires the identification of the location, size type and condition of all existing trees on the Project Site with a diameter breast height (DBH) of 8" or greater. These trees are defined as non-protected significant trees. Smaller trees or shrubs not meeting this criteria were not surveyed.

<sup>&</sup>lt;sup>17</sup> The Wilshire Community Plan identifies these properties with the land use designation of Neighborhood Office. However, ZIMAS identifies these properties with the land use designation of Neighborhood Office Commercial.

homeless shelter use are permitted by conditional use as authorized under Planning Case Nos. CPC-2014-1602-CU-SPE-SPP-DB-SPR, CPC-2014-1602-CU-SPE-SPP-DB-SPR-PA1, and CPC-2014-1602-CU-SPE-SPP-DB-SPR-PA2.

- South: The Project Site is immediately bordered by the Midway Car Rental business and Dewey Pest Control business located directly south of the Project Site. These properties are zoned M1-1 with a Limited Industrial General Plan land use designation. Located further south, on the south side of Beverly Boulevard, are more community serving commercial/industrial lots, also zoned M1-1 with a Limited Industrial General Plan land use designation.
- West: The Project Site is immediately bordered by Juanita Avenue to the west. On the west side of Juanita Avenue, there are several multi-family and commercial properties zoned R4-1, C2-1, and [Q]CM-1. All of these properties have a Neighborhood Commercial General Plan land use designation. The building at 335 Juanita Avenue is the La Kretz Villas, a four-story low income multi-family apartment building managed by PATH Villas Hollywood. This Property is zoned R4-1. South of the La Kretz Villas are two vacant surface parking lots. The lot at 329 Juanita Avenue is zoned C2-1, while the lot at 321 Juanita Avenue is in the R4-1 Zone. The two lots located at 311 Juanita Avenue are vacant surface parking lots and are in the [Q] M1-1 Zone. The property at the northwest corner of Beverly Boulevard and Juanita Avenue (3755 Beverly Boulevard), is a three-story office building with offices and parking on the ground floor and two office levels above the ground floor. This property is in the C2-1 Zone.



Source: Google Earth, Aerial View, 2019.



# Figure 3.4 Aerial Photograph of the Project Site and Surrounding Land Uses



View 1: On the intersection of Juanita Avenue and Oakwood Avenue looking east at the Project Site.



View 3: On the east side of Madison Avenue looking west at the Project Site.



View 2: On the north side of Oakwood Avenue looking southwest at the Project Site.



View 4: On the west side of Juanita Avenue looking southeast at the Project Site.



View 5: On the west side of Juanita Avenue looking northeast at the Project Site.



View 6: On the intersection of Oakwood Avenue and Madison Avenue looking southwest the Project Site.

Source: Parker Environmental Consultants, June 13, 2019.





View 7: On the south side of Beverly Boulevard looking northeast at the properties east of the Development Site.



View 9: On the intersection of Beverly Boulevard and Juanita Avenue looking northwest at the properties west and northwest of the Development Site.



View 8: On the south side of Beverly Boulevard looking northeast at the properties southeast of the Development Site.



View 10: On the west side of Juanita Avenue looking northeast at the properties north of the Development Site.



View 11: On the south side of Beverly Boulevard looking northeast at the properties south of the Development Site.



View 12: On the east side of Juanita Avenue looking northeast at the properties north of the Development Site.

Source: Parker Environmental Consultants, June 13, 2019.



Figure 3.6 Photographs of the Surrounding Land Uses Views 7-12

# 3.3. Description of the Proposed Project

## 3.3.1. Project Overview

The Proposed Project includes the demolition of three existing commercial buildings used for the commercial operation of a telecommunications company (totaling 7,881 square feet), three existing single-family residential buildings (totaling 1,518 square feet), one surface parking lot, and removal of three non-protected trees and one street tree. The Project includes the renovation of an existing 5,663 square-foot two-story officebuilding above a one-level partially subterranean garage, and the construction, operation, and maintenance of five eight-story multi-family buildings with 454 permanent supportive housing dwelling units. The Proposed Project consists of 100 percent affordable housing for the formerly homeless, exclusive of the five manager's units, serving lower-income and target population members. The Proposed Project includes 370 studio units, 71 onebedroom units, and 13 two-bedroom units. The Proposed Project includes 23 vehicular parking spaces within an at-grade parking level in three of the five buildings and 251 bicycle parking spaces within an at-grade parking level in all five buildings. Vehicular access to the Project Site will be provided via one full-access driveway along Madison Avenue, one full-access driveway along Oakwood Avenue, one full-access driveway along Juanita Avenue, and a loading/drop-off area along Madison Avenue. Additionally, the Proposed Project provides 36,580 square feet of interior and exterior open space and 11,772 square feet of resident services space (including 5,700 square feet of case management space and 6,072 square feet of interior open space). The Proposed Project's total floor area consists of 247,812 square feet of residential space, resulting in a Floor Area Ratio of 2.8:1. The maximum building height is 95 feet above grade.

A summary of the Proposed Project is provided in Table 3.2, Proposed Development Program, below. The plan layout of the Proposed Project is depicted in Figure 3.6, Plot Plan. The floor plans are illustrated in Figures 3.7 through 3.11.
Land Uses	Units	Floor Area			
Existing Uses to be Demolished					
321 Madison Avenue (commercial)		7.881 sf			
3812-3814 Oakwood Avenue (residential)	3 DU	1,518 sf			
Subtotal		9,399 sf			
Existing Uses to Remain					
3838 Oakwood Avenue (office)		5,663 sf			
Description (					
Proposed Project Multi Ferrily Decidential					
	404 DU	247 812 of 6			
Common Areas <sup>b</sup>	14,600 sf	247,012 51			
Common Areas	FAR:	<b>2 8 1</b> d			
Notes:					
<sup>a</sup> Supportive services area includes 5.700 square	feet of case r	nanagement services			
and 6,072 square feet of interior open space are	as (communi	ity rooms computer			
rooms, and/or community kitchens).					
<sup>b</sup> Common areas include but not limited to resider	ntial lobbies, i	mailrooms, laundry			
rooms, and or other common decks and interior	rooms.				
<sup>c</sup> Areas designated exclusively for Supportive Services uses or common areas					
accessible to all residents, including those for accessory residential or Supportive					
calculating the total allowable Floor Area. The Floor Area shall be measured to the					
center line of wall partitions between public and non-public areas					
<sup>d</sup> The calculation of the project's total FAR applies to the new buildable lot area of 321					
Madison Avenue (87,466 sf) and excludes the lot area or existing developed floor					
area contained within 3838 Oakwood Avenue. No additional floor area or density is					
proposed for 3838 Oakwood Avenue.					
Source: KFA Associates, December 13, 2019.					

# Table 3.2Proposed Development Program

#### **Residential Uses**

As shown in Table 3.2, above, the Proposed Project consists of 454 residential units in five buildings, including 370 studio units, 71 one-bedroom units and 13 two-bedroom units. All units include at least one bathroom and cooking facilities with, at minimum, a stovetop, a sink, and a refrigerator. The total residential floor area includes approximately 247,812 square feet. Figure 3.7 shows the layout of the five new buildings to be developed as part of the Project.

The Northeast Building, which is the northerly most building on the Project Site and fronts on Oakwood Avenue and Madison Avenue, is eight stories in height and consists of 143 dwelling units, including 111 studio units, 22 one-bedroom units, and 10 two-bedroom units.



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Figure 3.7 Plot Plan





Figure 3.8 First Floor Plan





Figure 3.9 Second Floor Plan





Figure 3.10 Third Floor Plan





Figure 3.11 Fourth Floor Plan





Figure 3.12 Fifth Floor Plan





Figure 3.13 Sixth Floor Plan





Figure 3.14 Seventh Floor Plan





Figure 3.15 Eighth Floor Plan





The Northwest Building, which is south of the Northeast Building and fronts on Juanita Avenue, is a maximum of eight stories in height and consists of a maximum of 84 dwelling units, including 48 studio units, 35 one-bedroom units, and one two-bedroom unit.

The Southeast Building, which fronts on Madison Avenue on the southeasterly boundary of the Project Site, is a maximum of eight stories in height and consists of a maximum of 90 dwelling units, including 76 studio units and 14 one-bedroom units.

The Southwest Building A, which is directly south of the Northwest Building and fronts on N. Juanita Avenue on the southwesterly boundary of the Project Site, is a maximum of eight stories in height and consists of a maximum of 74 dwelling units, including 73 studio units and one two-bedroom unit.

The Southwest Building B, which is directly south of the Northwest Building and directly east of Southwest Building A and does not front any street, is a maximum of eight stories in height and consists of a maximum of 63 dwelling units, including 62 studio units and one two-bedroom unit.

All of the proposed units, exclusive of the five managers units, will be affordable. Five percent of the units will be affordable to Extremely Low Income households; 11 percent will be affordable to Very Low Income households; and 84 percent will be affordable to Low Income households.

All of the proposed units, exclusive of the managers units, will be occupied by the target population, which includes homeless individuals and families, and individuals and families currently living in supportive shelters and interim housing that qualify as homeless when approved for tenancy in the permanent supportive housing project.

#### Support Services Uses

The Proposed Project includes supportive services space, consisting of community rooms, case management offices, computer rooms, and/or community kitchens, and totaling approximately 11,772 square feet of floor area. The support services are located near the building lobbies of each building. This area comprises 4.7 percent of the Proposed Project's floor area.

## 3.3.2. Floor Area and Density

The Project Site<sup>18</sup> includes a gross lot area of 90,974 square feet with 87,466 square feet of buildable area. The Proposed Project would provide approximately 247,812 square feet of residential floor area. Qualified Permanent Supportive Housing Projects shall not exceed a maximum Floor Area Ratio of 3:1. Areas designated exclusively for supportive services uses or public areas accessible to all residents, including those for residential or supportive services uses, shall not be considered floor area of the building for purposes of calculating the total allowable Floor Area. The Floor Area shall be measured to the center line of wall partitions between public and non-public areas.

The Development Site is located within the M1-1 Zone and Subarea D of the SNAP. Residential units are not permitted in the M1 Zone unless an existing industrial building is being converted either by way of a conditional use permit process or under the Adaptive Reuse Ordinance. Subarea D allows uses of the CM Zone, except that Projects with hotel, motel, apartment hotel, and residential uses are prohibited.

In order to provide residential uses on the Development Site, the Applicant is requesting a General Plan Amendment, Zone Change and Specific Plan Amendment to create a zone and Subarea (See Exhibit B for Specific Plan Amendment and Exhibit C Development Standards in the Entitlement Package) that permits unspecified density for a qualified Permanent Supportive Housing Project. The Project proposes the development of 454 dwelling units as part of a Qualified Permanent Supportive Housing Project.

The Proposed Project is a multi-lot development with five individual buildings. The Southwest Building A includes a maximum of 74 units, the Southwest Building B includes 62 units, the Northwest Building includes a maximum of 84 units, the Northeast Building includes a maximum of 143 units and the Southeast Building includes a maximum of 90 units. The Proposed Project consists of 370 studio units, 71 one-bedroom units and 13 two-bedroom units that all offer private baths, kitchens and living spaces critical to promoting resident independence.

<sup>&</sup>lt;sup>18</sup> The proposed Development Site does not include 3838 Oakwood Avenue. Although the property identified as 3838 Oakwood is included within the Project Site area, the existing building on this parcel would be renovated in place and no changes to the existing floor area would occur. 3838 Oakwood is not a part of the proposed subdivision and will remain a separate parcel.

# 3.3.3. Building Height

The Project Site is located in Height District No. 1, which does not set a specific height limit for development in the M1 or the CM zones. The proposed entitlements would not change the Height District.

The proposed eight-story multi-family residential buildings are planned for a maximum height of 95 feet above grade at the top of the parapet. Refer to Figure 3.16 and Figure 3.18 for the elevations of the proposed buildings. Section Plans of the Proposed Project are depicted in Figure 3.19. Illustrations depicting the building sections of the Proposed Project are provided in Figure 3.20 and Figure 3.21.

# 3.3.4. Yards and Setbacks

The Development Site has three separate street frontages and several internal property lines. Based on the Department of City Planning discussion with LADBS, all three street frontages are considered front yards and all internal property lines are considered side yards. There are no rear yards as part of the Development Site.

Based on the proposed SNAP Subarea D.2, yard provisions would be in accordance with the proposed underlying zone. The Applicant is requesting a Zone Change from M1 to CM so the yard provisions of the CM zone would apply. However, the Applicant is also requesting a Developer Incentive pursuant to LAMC Section 11.5.11(e), to utilize the side yard requirements for the RAS3 zone per LAMC 12.10.5 in lieu of the side yard requirements in the underlying CM zone. The CM zone does not require front yard setbacks and the RAS3 zone requires 5-foot side yards. Thus, the Project is not required to provide a minimum front yard setback on and is required to provide side yard setbacks of at least 5 feet.

The Project includes varying setbacks from all property lines ranging from 0 feet to 37' - 6". Along street frontages (which are all front yards), the Northeast Building would have a minimum setback of 0 feet from Oakwood Avenue and a minimum setback of 0 feet from Madison Avenue, the Southeast Building would have a minimum 4' - 1" setback from Madison Avenue, the Northwest Building would have a minimum 17-foot setback from Juanita Avenue and the Southwest Building A would have a minimum 2' - 10" setback from Juanita Avenue. In multiple instances, varying building setbacks along street frontages are determined by the location requirements of the transformer so they are accessible to the public street.

The minimum interior yard setback would be 5' - 1" for a portion of the Southwest Building B between the building and the southwesterly property line. All other interior yard setbacks range from 10' - 2" to 13' - 11".

Aditionally, the Applicant is also requesting a Developer Incentive pursuant to LAMC Section 11.5.11(e), to eliminate the 15-foot step back(s) required by Section VI.6 of the SNAP Development Standards and Design Guidelines along the front property line.

## 3.3.5 Design and Architecture

The Proposed Project is a campus of five mid-rise (eight-story) multi-family residential buildings with modern architectural materials including vinyl clad windows and doors, metal railings, composite siding, fiber cement siding, and standing seam siding. Architectural renderings of the Proposed Project are provided in Figure 3.18.

# 3.3.6 Open Space and Landscaping

The open space requirements and amount of open space proposed for the Proposed Project are summarized in Table 3.3, Summary of Required and Proposed Open Space Areas, below. The Applicant will utilize the incentive established within LAMC Section 11.5.11 which allows for a twenty (20) percent reduction in required open space. As such, the Proposed Project would be required to provide 36,580 square feet of open space. Consistent with this requirement, the Project Site would provide 36,580 square feet of open space on the first floor of each of the five buildings (See Figure 3.7, Figure 3.8, and Figure 3.9). Common open space includes, but is not limited to, ground level courtyards, roof terrace, and community rooms including 5,700 square feet of Case Management service area as well as 6,072 square feet of interior open space. (refer to Figure 3.21, Composite Landscape Plan).

Summary of Required and Proposed Open Space Areas			
LAMC Open Space Requirements	Dwelling Units	Open Space (square feet)	
Less than 3 Habitable Rooms (100 sf/du)	441 du	44,100 sf	
3 Habitable Rooms (125 sf/du)	13 du	1,625 sf	
Sub-Total:	454 du	45,725 sf	
- 20% open space reduction entitlement		-9,145 sf	
Total Required:		36,580 sf	
Dran and Onen Space Area	Proposed Open Space (square feet)		
	(squ	are feet)	
Exterior Open Space	<b>(squ</b> 30	are feet) ,508 sf	
Exterior Open Space	(squ 30 6,	<b>are feet)</b> ,508 sf 072 sf	
Exterior Open Space Interior Open Space Total Open Space Provided:	(squ 30 6, 36	are feet) ,508 sf 072 sf ,580 sf	

Table 3.3Summary of Required and Proposed Open Space Areas









Figure 3.18 North and South Elevations





Figure 3.19 Paseo Elevations



Source: Land Images Landscape Architecture, March 8, 2020.



Figure 3.20 Landscape Concept Plan

## 3.3.7. Access, Circulation, and Parking

The main vehicular access (ingress and egress) will be provided via Madison Avenue. A centralized drop-off and pickup will also be provided on Madison Avenue. Vehicular access will also be provided via driveways on Oakwood Avenue and Juanita Avenue to parking for those components of the Proposed Project. The Proposed Project traffic will therefore use Madison Avenue, Juanita Avenue and Oakwood Avenue to access the Proposed Project.

The Proposed Project also proposes to vacate the northern portion of Madison Avenue between the project turnaround and Oakwood Avenue, as shown in Figure 3.7, Plot Plan. The project turn-a-bout driveway on Madison Avenue is designed to facilitate full size transit buses and para-transit vehicles.

It is anticipated that the vacated portion of Madison Avenue and Oakwood Avenue would not be available for general public use, and would be controlled by a control arm type device. The Proposed Project's residents and employees would pass through the vacated street section with use of key card or similar device to operate the control barrier. A similar option would be provided for the adjacent PATH project on the east side of Madison Avenue to Oakwood Avenue. The public would not however be able to use this section of Madison Avenue connecting to Oakwood Avenue.

#### Vehicle Parking

Pursuant to the incentives established in Subarea D.2, the Proposed Project is not required to provide any vehicular parking for residential units restricted to the target population. Consistent with the incentives established with the Subarea D.2, the Proposed Project will provide one parking space for each 20 units to be used by building managers, guests, supportive services, and case managers. Up to 40 percent of the total required parking spaces may be provided as compact stalls. With 454 dwelling units, the Proposed Project would require 23 guest parking spaces to accommodate the anticipated parking demand of the building managers, guests, supportive services, and case management. Therefore, as summarized in Table 3.4, the Proposed Project would be consistent with the applicable vehicle parking requirements.

Table 3.4Summary of Required and Proposed Vehicle Parking Spaces

Description		Quantity		Parking Required		Parking
				Rate	Spaces	Provided <sup>b</sup>
Required Parking						
Multi-Family Residential <sup>a</sup>	454 c	du 1 sp / 20 du		23	23	
Total Parking Required					23	
Total Parking Required  23 23   Notes: du = dwelling unit, sf = square feet  23 23   a Pursuant to LAMC Section 14.00.A.13.(d)(2)(iii) one parking space for every 20 dwelling units or guest rooms shall be required for the purpose of accommodating guests, supportive services, and case management. b The Proposed Project is seeking a Developer Incentive to provide reduced parking.						

#### **Bicycle Parking**

The Proposed Project provides on-site bicycle parking for resident use. As summarized in Table 3.5, below, the Proposed Project would be consistent with the applicable parking requirements under SNAP Subarea D.2 Development Standards and Design Guidelines. The Proposed Project would provide 251 bicycle parking spaces. In the event the number of residential units is reduced from the current plans, the amount of vehicle and bicycle parking would be revised accordingly to meet the code requirements. For purposes of calculation of bicycle parking, the supportive services provided on-site are considered accessory uses, not independent nonresidential uses because they are associated with services provided directly to residents of the Proposed Project who will not need a separate bicycle space to access these on-site uses.

	Quantity	Bicycle Park	ing Required	Total	Total
Description	Quantity	Short Term	Long Term	Spaces Required	Spaces Provided
Residential <sup>[b]</sup>		sp	/ du		
Studio Units	370 du	0.5 sp/du		184	
1 Bedroom Units	71 du	0.5 sp/du		36	227
2 Bedroom Units	<u>13 du</u>	0.5 sp/du		<u>7</u>	221
Total	454	·		227	
SNAP Development Standards and Design Guidelines <sup>[c]</sup>		1 bike rack (2 sp) / 50 ft			
Lot Frontage	597.75 ft	12 racks		24	24
			TOTAL	251	251

Table 3.5Summary of Required and Proposed Bicycle Parking Spaces

Notes: du = dwelling unit, sf = square feet, sp = space, ft = feet

<sup>[a]</sup> LAMC 12.21 A.16 (a)(2) for office commercial use. A minimum of two parking spaces shall be provided in each building.

<sup>[b]</sup> Residential bicycle parking rates based upon Vermont SNAP Specific Plan for Subarea C (Community Center)

<sup>[c]</sup> Bicycle parking rates are based upon the Vermont SNAP Streetscape Elements. 597.75 sf of street frontage requires 12 racks and 28 bike spaces.

Source: KFA Associates, December 13, 2019

#### **Street Vacations**

As a separate action, the Applicant may seek approval to vacate a portion of Madison Avenue (between the proposed driveway/round-about and Oakwood Avenue), Oakwood Avenue (between Westmoreland Avenue and Juanita Avenue), and a portion of Juanita Avenue (fronting the property at 3838 Oakwood Avenue) to allow for a turnaround at the proposed new terminus of Juanita Avenue and Oakwood Avenue. The Proposed Project, as defined above, is not dependent upon this request. Nevertheless, it is being disclosed herein for informational purposes and potential future clearance under CEQA, if required. The vacation of Madison Avenue and Oakwood Avenue would allow for secured and controlled access to the Project Site and the adjacent PATH project, and would provide an opportunity to facilitate transit access and enhance landscaping and open space features within the area to be vacated. The operation of the Proposed Project is not dependent upon any future street vacations.

## 3.3.8. Lighting and Signage

Exterior lighting features within the Project would consist of low level illuminated pedestrian walkways and lighting within common open space areas and outdoor courtyards. On site signage would include site identity and wayfinding signs in accordance with the LAMC.

# 3.3.9. Site Security

Security for the Proposed Project will be provided via site planning, secured access points of entry, and on-site security personnel who would operate 24 hours a day, seven days a week. The Proposed Project includes an on-site leasing office and on-site manager's units which will provide continuous on-site presence and services for residents to report security concerns. Entry doors to the main building and public areas will be secured with locks and gates to ensure safe and convenient access for residents.

The plans for the Project will incorporate design guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to access control to the building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.

# 3.3.10. Sustainability Features

The Proposed Project will comply with the 2017 L.A. Green Building Code, which sets high standards to conserve energy. As further described in the Energy Use Analysis below, compliance with Title 24 of the California Code of Regulations and the L.A. Green Building Code will reduce the Proposed Project's energy consumption.

The Project will comply with the requirements for renewable energy and solar-ready buildings per LAMC section 99.04.211, which require all buildings to comply with the California Energy Code (CCR), Title 24, Part 6, sections 110.10(b) through 110.10(d). Approximately 5,780 square feet of rooftop space is able to accommodate solar panels.

The 2019 Building Energy Efficiency Standards for solar panels, which went into effect on January 1, 2020, apply to building permit applications submitted on or after that date.

## 3.3.11. Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 24 months, with final buildout occurring in 2023. Construction activities associated with the Project will be undertaken in four stages: (1) demolition/site clearing; (2) grading; (3) building construction; and (4) finishing and architectural coatings and will be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. The Proposed Project will also comply with the restrictions provided in LAMC Section 41.40, including (1) limiting construction hours within the City to 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,(2) limiting hauling activities to 9:00 A.M. to 3:00 P.M. Monday through Friday and 8:00 A.M. to 4:00 P.M. on Saturdays, and (3) prohibiting construction or hauling activities on Sundays.

#### Demolition/Site Clearing Phase

The Proposed Project would entail the demolition of 9,399 square feet of existing uses, including three existing commercial buildings (7,881 square feet), three single-family dwelling units (1,518 square feet), and paved surface parking areas consisting of approximately 845 cubic yards (cy) of asphalt. The site clearing and demolition phases are anticipated to occur over an approximate 1 to 1.5 month period.

#### Grading Phase

After the completion of demolition phase, the grading/excavation phase for the Proposed Project will occur for approximately 2 months and will involve mass grading the Project Site for the cut and fill of land to ensure the proper base and slope for the building foundations. The Proposed Project is estimated to require approximately 3,040 cy of soil to be hauled off-site in order to build the building foundations. The soil will be exported to the United Rock Products Pit No. 2 inert landfill in Irwindale. It is anticipated that the export phase would include approximately 10 trucks a day over a 19 day period, using 18-wheel bottom dump trucks with a soil capacity of 16 cy per truck.

#### **Building Construction Phase**

Construction of the Proposed Project would occur over an approximate 15 month period and would include the development of five separate buildings totaling 247,812 square feet of developed floor area.

Concurrent with the building construction phase, the existing 5,663 square foot, two-story office building above a one-level partially subterranean garage located at 3838 Oakwood would be renovated. No change of use is proposed.

#### Finishing/Architectural Coating Phase

The finishing phase would occur following the completion of each building and is expected to overlap the construction of the five new buildings. The final finishing phase after the construction of the fifth building is expected to occur over a four-month period.

#### Paving

The final phase would involve paving sidewalks, common areas, street curbs and gutters within the vacated portion of Madison Avenue and landscaping improvements. The paving phase is anticipated to occur over a two to three week period during the last month of construction.

## 3.4 Related Projects

In accordance with CEQA Guidelines Section 15064(h), this SCEA includes an evaluation of the Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.

(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the 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. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely 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, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

The related projects identified are included in Table 3.6, Related Projects List, below. A total of 22 related projects were identified within the vicinity of the Project Site. An analysis of the cumulative impacts associated with these related projects and the Proposed Project are provided under each individual environmental impact category in Section 4 of this SCEA. The locations of the related projects are shown in Figure 3.20, Location of Related Projects.

Project	Project Name	Location/Address	Project	Size	Units
Number			Description	0.20	•
1	Mixed-Use	3200 Beverly Boulevard	Apartments	32	du
			Retail	5,866	st
2	AMCAL – Meridian	241 Vermont Avenue	Apartments	100	du of
	Apartment and		Apartments	5,000	SI du
3	Child Care	3330 Beverly Boulevard	Day Care	40	sf
4	Apartments	235 Hoover Street	Apartments	214	du
			Apartments	120	du
5	Mixed- Use	600 Vermont Avenue	Retail	14,600	sf
	District		Office	20	emp
6	District Maintananaa Vard	611 Hoover Street	Office (Fleet Staff)	80	emp
			Other	40	veh
7	Dillion Mixed-Use	609 N. Dillon Street	Apartments	52	du
-			Retail	18,600	sf
8	Charter School Relocation	3400 W. 3 <sup>rd</sup> Street	N/A		
_	Postpartum		Postpartum Care	140	unit
9	Extended Care	257 Mariposa Avenue	Retail	3,490	sf
10	and Retail			05	
10	Apartments	326 N. Reno Street	Apartments	65	du
11	Apartments	617 Dillon Street	Apartments	49	du
12	Apartments	427 Berendo Street	Apartments	2 166	du
	Mixed-Use	510 S. Vermont Avenue	Potail	2,100	SI
13			Anartments	318	du
			Community Center	13 200	sf
14	Apartments	2812 Temple Street	Apartments	42	du
15	Apartments	4100 Melrose Avenue	Apartments	34	du
16	Restaurant	269 Mariposa Avenue	Restaurant	4 656	sf
17	Apartments	146 Berendo Street	Apartments	15	du
	, iparanonia		Apartments	490	du
18	Apartments	200 Vermont Avenue	Retail	35.000	sf
19	Apartments	642 Juanita	Apartments	31	du
20	Affordable Housing (PATH II)	320/330 Madison	Affordable Housing	190	du
e t	Mixed-Use		Apartments	67	du
21		3911 Beverly Boulevard	Retail	8,450	sf
22	Apartments	432 Normandie Avenue	Apartments	14	du
Notes: du = dwelling unit, sf = square feet, emp = employees, veh = vehicles Source: The Mobility Group, Transportation Study, January 2020.					

Table 3.6 Related Projects



Source: The Mobility Group, August 30, 2019.



Figure 3.21 Related Project Map

## 3.5 Requested Permits and Approvals

The SCEA analyzes the impacts associated with the Proposed Project and is intended to provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Proposed Project. Flexible PSH Solutions, Inc. (Applicant) is requesting the following land use entitlement requests as part of the Proposed Project:

- 1. Pursuant to LAMC Section 11.5.6, as authorized by the Los Angeles Charter Section 555, approval of a General Plan Amendment to revise the land use designation in the Wilshire Community Plan from Limited Industrial<sup>19</sup> to Commercial Manufacturing to permit the construction of a new multi-phased Permanent Supportive Housing project which combines Restricted Affordable units with supportive social services for formerly homeless individuals. The proposed Project contains a maximum of 454 residential dwelling units, including 449 Restricted Affordable units and 5 managers' units with approximately 11,772 square feet of residential supportive services.
- 2. Pursuant to LAMC Section 12.32 F, approval of a Zone Change from M1-1 Zone (Limited Industrial) to CM-1 Zone (Commercial Manufacturing) to permit the construction of a new Permanent Supportive Housing project which combines Restricted Affordable units with supportive social services for formerly homeless individuals. The Proposed Project contains a maximum of 454 residential dwelling units, including 449 Restricted Affordable units and 5 managers' units with approximately 11,772 square feet of residential supportive services.
  - a. Pursuant to LAMC Section 11.5.11 (e) and California Government Code Section 65915(k), the following incentives are being requested in connection with a 100 percent affordable project:
    - i. A 20% reduction in overall open space requirement to permit 36,580 square feet of Open Space in lieu of providing 45,725 square feet.
    - The elimination of Section VI.6 of the Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan (SNAP) Development Standards and Design Guidelines along the front property line.

<sup>&</sup>lt;sup>19</sup> The Wilshire Community Plan General Plan Map identifies the site with the land use designation of Limited Industrial. ZIMAS identifies the site with the General Plan land use designation of Limited Manufacturing.

- To utilize the side yard requirements for the RAS3 zone per LAMC 12.10.5 in lieu of the side yard requirements in the underlying CM zone.
- 3. Pursuant to LAMC. Section 11.5.7 G, approval of a Specific Plan Amendment to introduce a new Subarea within the SNAP, Subarea D.2 Commercial Manufacturing/Permanent Supportive Housing, to permit the construction of qualified Permanent Supportive Housing project that includes Restricted Affordable housing units with supportive social services for formerly homeless. As mentioned previously, this project proposes a development containing a maximum of 454 residential dwelling units including 449 Restricted Affordable units and 5 managers' units with approximately 11,772 square feet of residential supportive services.
- 4. Pursuant to LAMC Section 11.5.7 C and Section 12.A.1 of the SNAP, a Project Permit Compliance Review.
- 5. Pursuant to LAMC. Section 16.05, approval of Site Plan Review findings for a project that proposes more than 49 new residential dwelling units.
- 6. Pursuant to California Government Code Sections 66473.1, 66474 (Subdivision Map Act) and LAMC Section 17.01 and 17.15, approval of a Vesting Tentative Tract Map to permit the merger and re-subdivision of the land and the creation of one ground lot containing 5 air space lots. The requested Lots included:
  - i. Lot 1: Master Ground Lot
  - ii. Airspace Lot 2: Northeast
  - iii. Airspace Lot 3: Southeast
  - iv. Airspace Lot 4: Southwest B
  - v. Airspace Lot 5: Southwest A
  - vi. Airspace Lot 6: Northwest
  - a. The Applicant requests a Haul Route approval.

The Proposed Project would also request discretionary and ministerial permits and approvals that may be deemed necessary including, but not limited to, the following: shoring, grading, foundation, removal of existing street trees, and building and tenant improvements. As a separate action, the Applicant may seek approval to vacate a portion of Oakwood Avenue (between Westmoreland Avenue and Juanita Avenue), a portion of Madison Avenue (between the proposed driveway/round about and Oakwood Avenue), and a portion of Juanita Avenue (fronting the property at 3838 Oakwood Avenue). The Proposed Project, as defined above, is not dependent upon this request. Nevertheless, it is being disclosed in this SCEA for disclosure and potential future CEQA clearance, if required.

## 4.1. Senate Bill 375

The State of California adopted SB 375, The Sustainable Communities and Climate Protection Act of 2008, which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California's greenhouse gas reduction mandates. SB 375 requires the State's 18 metropolitan planning organizations to incorporate a "Sustainable Communities Strategy" into the regional transportation plans to achieve their respective region's greenhouse gas emission reduction targets set by California Air Resources Board (CARB). The Southern California Association of Governments (SCAG) is the metropolitan planning organization that has jurisdiction over the Project Site.

On April 7, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS). For the SCAG region, the CARB has set greenhouse gas reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035. The 2016 RTP/SCS outlines strategies to meet or exceed the targets set by CARB.<sup>20</sup>

## 4.2. Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to Transit Priority Projects (TPPs). A TPP is a project that meets the following four criteria (see Public Resources Code, Section §21155 (a) and (b)):

 Is consistent with the use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the ARB has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets established by CARB;

<sup>&</sup>lt;sup>20</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, Introduction, April 7, 2016.

- 2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
- 3. Provides a minimum net density of at least 20 units per acre; and
- 4. Is within one-half mile of a Major Transit Stop or High-Quality Transit Corridor included in a regional transportation plan.

As discussed below, the Proposed Project qualifies as a TPP and meets the qualifying criteria pursuant to Public Resources Code, Section §21155 as outlined above.

#### Consistency with Criterion #1:

# The Project is consistent with the general use designation, density, and building intensity and applicable policies of specified for the project area in either a sustainable communities strategy or an alternative planning strategy.

In April 2016, SCAG's Regional Council adopted the 2016-2040 RTP/SCS: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. 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 June 28, 2016, CARB accepted SCAG's quantification of GHG emission reductions from the 2016–2040 RTP/SCS and determined that the 2016–2040 RTP/SCS would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by CARB.<sup>21</sup>

#### Use Designation, Density, and Building Intensity

Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 Place Types, and then classified sub-regions into one of three land use development categories (LDCs): urban; compact; or standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region. (2016-2040 RTP/SCS, pp. 20-21.) The SCAG 2016-2040 RTP/SCS, Sustainable Communities Strategy Background Documentation, Appendix (April 2016), forecasted LDCs by county and subregion for 2012 and 2040; Exhibit 13: Forecasted Regional Development Types by Land Development Categories (2012) - Los Angeles City Subregion, and Exhibit 14: Forecasted Regional Development Types by Land

<sup>&</sup>lt;sup>21</sup> ARB Executive Order No. 16-066.

Development Categories (2040) - Los Angeles City Subregion are provided in Appendix L of this SCEA. The forecasted land use development patterns by LDCs

The 2016-2040 RTP/SCS utilizes a classification system, known as Land Development Categories (LDC). SCAG notes that the LDCs utilized in the RTP/SCS are not intended to represent detailed land use policies, but are used to describe the general conditions likely to occur within a specific area if recently emerging trends, such as transit-oriented development, were to continue in concert with the implementation of the 2016 RTP/SCS. The forecasted land use development patterns by LDCs shown on the aforementioned exhibits (provided in Appendix L) are based on Transportation Analysis Zone ("TAZ") level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts were not adopted as part of the 2016 RTP/SCS. However, these data may be used at the discretion of local agencies, which maintain their existing authority over local planning and land use decisions and will be solely responsible for determining consistency of any future project with the 2016 RTP/SCS.

The Project Site is located in the Urban LDC, which is the highest density and most intense land development category assessed in the 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS describes the Urban Land Development Category as:

These areas are often found within and directly adjacent to moderate and highdensity urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached singlefamily (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have wellconnected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle. (page 20)

The Proposed Project would be consistent with the Urban LDC. The Proposed Project is located within a highly urbanized area within the City of Los Angeles, in the Wilshire Community Plan area. The Proposed Project is an infill project that would provide affordable multi-family units and community serving ground floor case management and social services uses. As discussed above, due to the Proposed Project's proximity to transit, it is located within a High-Quality Transit Area (HQTA). HQTA's support transit opportunities and promotes a walkable environment. The Project Site is located within 500 feet of the Vermont/Beverly Rail Station, a Major Transit Stop. Additionally, access to the Project Site is served by a well-connected street network, which consists of a grid

pattern as is most of the City of Los Angeles. The predominant housing type in the Project Site area is multi-family residential. As such, the Proposed Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle.

The 2016-2040 RTP/SCS further demonstrates that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Proposed Project is an affordable housing project, which includes a campus of five eight-story residential buildings with 454 residential dwelling units and 11,772 square feet of case management and social services spaces. The Proposed Project promotes pedestrian activity and bicycling activity by providing landscaping along the public right-of-way as well as first floor courtyard spaces. The Proposed Project would provide limited parking for the supportive service and case management uses that is consistent with LAMC standards. Therefore, the Proposed Project is consistent with the expectations of developments within HQTAs.

The RTP/SCS includes various urban footprint place types, including mixed use, residential, commercial, office, research and development, industrial, civic and open space. (SCAG 2016-2040 RTP/SCS Background Documentation, p. 90, 'Place Types Categorized Into Land Development Categories (LDCs); SCAG 2016-2040 RTP/SCS, Urban Footprint Place Types, pp. 1-2).

'Urban Residential' place types "are typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking [is] usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs." The land use mix for this place type is typically approximately 64 percent residential, 4 percent employment, 12 percent mixed use and 21 percent open space/civic. The residential mix is 100 percent multi-family. The average total net FAR is 9.0, floors range from 15-100, and the gross density ranges from 0-50 employees per acre 75-500+ households per acre. (SCAG 2016-2040 RTP/SCS, Urban Footprint Place Types, p. 1.)

The Proposed Project is a residential development up to eight stories tall consisting of residential and support services uses in a highly-urbanized part of Los Angeles, on a site that is currently occupied by three commercial buildings, three single-family residential buildings, one office building, and one surface parking lot. Adjacent land uses include multi-family residential (including permanent supportive housing), office, commercial/retail, industrial uses, and surface parking. The Proposed Project's floor area is approximately 95 percent residential, and approximately 5 percent non-residential with a non-residential FAR of 0.13 to 1. The project area, generally consisting of a one-quarter mile radius, is supported by high levels of regional and local transit. The Proposed Project

would construct approximately 226 dwelling units per acre and will have a total net FAR of 2.8:1.

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 and approximately 1,325,500 residences in 2012. By the year 2040, SCAG forecasts that the City of Los Angeles will increase to 4,609,400 persons (or a 20% increase since the year 2012) and approximately 1,690,300 residences (or a 28% increase since the year 2012). SCAG's population and housing projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2012 and 2040 are further summarized in Table 4.1, below.

Depulation						
Region	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						
Region	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						
Region	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, adopted 2016-2040 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.						

Table 4.1SCAG Population and Housing Projections for theCity of Los Angeles, Los Angeles County, and the SCAG Region

The Proposed Project is an infill development project within the Wilshire Community Plan Area within the City of Los Angeles. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.6 million persons by 2040. As shown in Table 4.1, SCAG population and housing projections from 2012 through 2040 envisions a population growth of 763,900 additional persons (an approximate 20% growth rate) in the City of Los Angeles and 3,816,000 additional persons (an approximate 21% growth rate) in the entire SCAG Region. The number of households within the City is Los Angeles is anticipated to increase by 364,800 households, or approximately 28% between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26% between 2012 and 2040. The number of employment opportunities is anticipated to increase by 472,700 jobs (approximately 28%) in the City of Los Angeles between 2012 and 2040, and the SCAG Region is anticipated to increase by 2,432,000 jobs (approximately 33%) between 2012 and 2040.

As discussed in Section 6.14, Population and Housing, the Proposed Project would result in an increase in approximately 564 net permanent residents in the City of Los Angeles.<sup>22</sup> The proposed increase in housing units and population would be consistent with SCAG's forecast of 364,800 additional households, approximately 763,900 persons, and 472,700 jobs in the City of Los Angeles between 2012 and 2040. As such, the Proposed Project would not cause growth (i.e., new housing) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout or that would result in an adverse physical change in the environment.

#### Applicable Policies Specified for the Project Area

The Proposed Project is consistent with SCAG's growth projections for the City of Los Angeles, which supports the conclusion that the Proposed Project is consistent with SCAG policies. Refer to Section 6.14, Population and Housing, for a discussion on the Proposed Project's consistency with SCAG's population and housing growth. The Proposed Project would be consistent with applicable goals and policies presented within SCAG's 2016-2040 RTP/SCS. Refer to Table 4.2 below for the Proposed Project's consistency analysis.

<sup>&</sup>lt;sup>22</sup> The Proposed Project includes a Permanent Supportive Housing development to serve the target population and has programmed occupancy rates. As such. the citywide average population for multifamily housing of 2.6 persons per household is not applicable. The projected population density is based on 370 one-person occupancy units, 71 two-person occupancy units, and 13 four-person occupancy units.
Coals and Policios	Consistency Assessment
2016-2040 RIP/SCS Goal 1 Align the plan	Not Applicable. This Goal is directed towards SCAG
investments and policies with improving regional	and the City of Los Angeles and not does apply to the
economic development and competitiveness.	Proposed Project. No further discussion is required.
2016-2040 RTP/SCS Goal 2 Maximize mobility and	Consistent. The Project Site is located in a highly
accessibility for all people and goods in the region.	urbanized area within the City of Los Angeles within a
	HQTA. The Proposed Project would develop 454
	dwelling units and 11,772 square feet of supportive
	space within 500 feet of the Vermont / Beverly Station
	and a Rapid Bus Stop, a Major Transit Stop.
	Additionally, the Project Site is located within 1/2 mile
	of numerous bus routes with peak commute service
	intervals of 15 minutes or less. The Proposed Project
	would provide residents, visitors, and target
	population members with convenient access to public
	transit and opportunities for walking and biking. The
	Proposed Project would also provide a a turn-a-bout
	driveway on Madison Avenue to facilitate access for
	busses and para-transit vehicles. The location of the
	Proposed Project encourages a variety of
	transportation options and access and is therefore
	consistent with this Goal.
2016-2040 RTP/SCS Goal 3 Ensure travel safety	Consistent. The Proposed Project would improve the
and reliability for all people and goods in the region.	public sidewalks adjacent to Project Site and would
	include active ground floor landscaping to enhance
	the pedestrian experience and promote walkability. In
	addition, the Proposed Project would provide 251
	bicycle spaces to promote travel by bicycle.
	Furthermore, 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.
2016-2040 RTP/SCS Goal 4 Preserve and ensure a	Not Applicable. This goal is directed towards SCAG
sustainable regional transportation system.	and the City of Los Angeles and does not apply to the
	Proposed Project. No further discussion is required.
2016-2040 RTP/SCS Goal 5 Maximize the	Consistent. The Proposed Project would place 454
productivity of our transportation system.	residential dwelling units and 11,772 square feet of
	supportive service area within 500 feet of a Major
	Transit Stop, the Vermont/Beverly Rail Station. Given
	the Proposed Project's location close to transit, the
	Proposed Project will encourage the utilization of
	transit as a mode of transportation to and from the
	project area. Additionally, the Proposed Project will
	include a turn-a-bout driveway on Madison Avenue to
	facilitate paratransit vehicles. Thus, the Proposed
	Project will contribute to the productivity and use of the
	regional transportation system by providing housing
	and jobs near transit. Moreover, as discussed in the
	Proposed Project's Transportation Study (located in

Table 4.2Consistency Analysis with the2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
	Appendix Lof this SCEA) the Proposed Project would
	not create a significant impact at any of the study
	intersections. Additionally, as discussed in the Traffic
	Study the Proposed Project would not create a
	significant impact at any CMP monitoring location
	Therefore, the Droposed Project is consistent with this
2016 2040 PTP/SCS Goal 6 Protect the environment	Consistent The Proposed Project is designed to
and health of our residents by improving air quality	active transportation. The Proposed Project is designed to
and encouraging active transportation (e.g. bicycling	place dwelling units and ground-floor supportive
and walking)	space within 500 feet of a Major Transit Stop the
	Vermont/Beverly Rail Station The Project Site's
	location near mass transit and proximity to services
	retail stores, and employment opportunities promotes
	public transit over vehicle use, and the streetscape
	improvements and pedestrian scaled landscaping
	create a pedestrian-friendly environment. The location
	and design of the Proposed Project promotes the use
	of a variety of transportation options, which includes
	walking, biking, and the use of public transportation.
	The Proposed Project would improve the public
	sidewalks adjacent to Project Site and would include
	active ground floor uses to enhance the pedestrian
	experience and promote walkability. In addition, the
	Proposed Project will provide 251 bicycle spaces to
	promote travel by bicycle. Thus, the Proposed Project
	is designed to reduce vehicle-miles-traveled and help
	improve air quality. Furthermore, the Proposed Project
	would comply with LAMC Section 99.05.504.5.3 of the
	LANIC, which requires mechanically ventilated
	buildings located within 1,000 feet of a freeway to
	provide air initration media for outside and return air
	(MER)() of 12. The Proposed Project residential and
	(MERV) of 13. The Proposed Project residential and
	of LAMC Section 09.05.504.5.3 As such adherence
	to the LAMC and incorporation of project design
	features would ensure Project consistency with
	Freeway Advisory Notice (ZI-2427) and would serve
	to improve indoor air guality. Therefore, the Proposed
	Project is consistent with this Goal.
2016-2040 RTP/SCS Goal 7 Actively encourage and	Consistent. The Proposed Project would comply with
create incentives for energy efficiency, where	the L.A. Green Building Code, the California Green
possible.	Building Code, and include requirements for a green
	or high albedo roof and that at least five percent of all
	parking spaces on-site shall be capable of supporting
	future electric vehicle (EV) charging stations. It also
	provides approximately 5,780 square feet of solar
	panels installed. Further, the L.A. Green Building
	Code requires the use of numerous conservation

Table 4.2Consistency Analysis with the2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
	measures, beyond those required by Title 24 of the California Code of Regulations. Therefore, the Proposed Project is consistent with this Goal.
2016-2040 RTP/SCS Goal 8 Encourage land use and growth patterns that facilitate transit and active transportation.	<b>Consistent.</b> As stated above, the Project Site is located in a highly urbanized area near downtown Los Angeles within 500 feet of a Major Transit Stop, the Vermont / Beverly Rail Station. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide residents, visitors, and patrons with convenient access to public transit and opportunities for walking and biking. The Proposed Project would develop dwelling units near mass transit and in close proximity to services, retail stores, and employment opportunities. The Proposed Project would improve the public sidewalks adjacent to Project Site and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project will provide 251 bicycle spaces to promote travel by bicycle. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
<b>2016-2040 RTP/SCS Goal 9</b> Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	<b>Not Applicable.</b> This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. No further discussion is required.
<b>2016-2040 RTP/SCS Guiding Policy 1</b> Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	<b>Not Applicable.</b> This policy is directed towards SCAG in allocating transportation investments. This goal does not apply to the individual development projects and no further discussion is required.
<b>2016-2040 RTP/SCS Guiding Policy 2</b> Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.	<b>Not Applicable.</b> This policy is directed towards SCAG in allocating transportation system funding. Nevertheless, the Proposed Project would contribute to a safe, well maintained, and efficient multi-modal transportation system. The Proposed Project would provide landscaping along the public right-of-way and active ground floor uses, which promotes and supports pedestrian activity in the area. As discussed in the Proposed Project's Traffic Study (located in Appendix I of this SCEA), the Proposed Project would not create a significant impact at any of the study intersections. Additionally, the Proposed Project would not create a significant impact at any CMP monitoring location.
<b>2016-2040 RTP/SCS Guiding Policy 3</b> RTP/SCS land use and growth strategies in the RTP/SCS will	<b>Not Applicable.</b> This Goal is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project. The Proposed Project would

Table 4.2Consistency Analysis with the2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
Coars and Ponces         respect local input and advance smart growth initiatives.         2016-2040       RTP/SCS         Guiding       Policy         4         Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	<ul> <li>develop 454 dwelling units and 11,772 square feet of resident service area within 500 feet of a Major Transit Stop. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. 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. Therefore, the Proposed Project would advance smart growth by increasing residential uses in transit-rich areas near services, retail, and employment opportunities.</li> <li>Not Applicable. This policy is directed towards transportation investment by SCAG. However, the Proposed Project would support active transportation. Nonetheless, the Proposed Project will promote active transportation. The Project Site is located within 500 feet of a Major Transit Stop, the Vermont/Beverly Rail Station. Additionally, the Project Site is located within 1½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide residents, visitors, and patrons with convenient access to public transit and opportunities for walking and biking. The Proposed Project would develop dwelling units near mass transit and in close proximity to services, retail stores, and employment opportunities. The Proposed Project would improve the public sidewalks adjacent to Project Site and would include active ground floor</li> </ul>
2016-2040 RTP/SCS Guiding Policy 5 HOV gap	promote walkability. In addition, the Proposed Project will provide 251 bicycle spaces to promote travel by bicycle.
closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	transportation investment by SCAG to support HOV, transit and rideshare. No further discussion is required.
<b>2016-2040 RTP/SCS Guiding Policy 6</b> The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.	<b>Not Applicable.</b> This policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. Nevertheless, the Proposed Project is located within 500 feet of a Major Transit Stop, the Vermont/Beverly Rail Station, and provides only 23 parking spaces. As such, the Proposed Project would support public transportation and other alternative methods of transportation (e.g., walking and biking).
RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more	and governmental agencies to encourage and support transportation investments. No further discussion is required.

Table 4.2Consistency Analysis with the2016-2040 Regional Transportation Plan / Sustainable Community Strategy

2016-2040 Regional Transportation P	ian / Sustainable Community Strategy
Goals and Policies	Consistency Assessment
efficient transportation system and sustainable	
outcomes in the long run.	
2016-2040 RTP/SCS Guiding Policy 8 Monitoring	Not Applicable. This policy is directed towards SCAG
progress on all aspects of the Plan, including the	and the City of Los Angeles and not does apply to the
timely implementation of projects, programs, and	Proposed Project. No further discussion is required.
strategies, will be an important and integral	
component of the Plan.	
2016-2040 RIP/SCS Land Use Policy 1 Identify	Not Applicable. This policy is directed towards SCAG
regional strategic areas for infill and investment.	to identify regional strategic areas. No further
2046 2040 DTD/2000 Land Has Dalian & Otwasters	discussion is required.
2016-2040 RTP/SCS Land Use Policy 2 Structure	Not Applicable. This Land Use Policy is directed
the plan on a three-tiered system of centers	towards SCAG and not does apply to the Proposed
2016 2040 BTP/SCS Land Liza Policy 2 Develop	Consistent SCAC describes the development of
"Complete Communities "	"complete communities" to provide gross that
Complete Communities.	complete communities to provide areas that
	of mobility options to complete short trips. 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.24
	As stated above, the Proposed Project would place
	dwelling units in a transit-rich area. The Project Site's
	location near mass transit and in proximity to services,
	retail stores, and employment opportunities promotes
	the use of a variety of transportation options, which
	includes walking, biking, and the use of public
	transportation. The Proposed Project would also
	improve the public sidewalks adjacent to Project Site
	and would include active ground floor uses to enhance
	the pedestrian experience and promote walkability. In
	addition, the Proposed Project will provide 251 bicycle
	spaces to promote travel by bicycle. Therefore, the
	Proposed Project would be consistent with the
	SCAG's goals of increasing residential uses in transit-
	rich areas near services, retail, and employment

Table 4.2Consistency Analysis with the2016-2040 Regional Transportation Plan / Sustainable Community Strategy

<sup>&</sup>lt;sup>23</sup> 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.

<sup>&</sup>lt;sup>24</sup> SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).

Goals and Policies	Consistency Assessment	
	opportunities to reduce vehicles-miles-traveled. Therefore, the Proposed Project is consistent with this policy.	
2016-2040 RTP/SCS Land Use Policy 4 Develop nodes on a corridor.	<b>Not Applicable.</b> 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. No further discussion is required.	
<b>2016-2040 RTP/SCS Land Use Policy 5</b> Plan for additional housing and jobs near transit.	<b>Consistent.</b> As stated above, the Proposed Project would place 454 dwelling units within 500 feet of a Major Transit Stop, the Vermont/Beverly Rail Station. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site's location would promote the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Therefore, the Proposed Project is consistent with this policy	
<b>2016-2040 RTP/SCS Land Use Policy 6</b> Plan for changing demand in types of housing.	<b>Consistent.</b> The Proposed Project would increase the housing stock in Los Angeles by providing safe, attractive, and centrally located studios, one-bedroom, and two-bedroom residential dwelling units. The proposed residential units would be available to Extremely Low Income to Low Income households. Thus, the Proposed Project is contributing to the range of housing choices in both size and affordability available in the Wilshire community and is therefore consistent with this goal.	
<b>2016-2040 RTP/SCS Land Use Policy 7</b> Continue to protect stable, existing single-family areas.	<b>Consistent.</b> The Proposed Project would not demolish any existing single-family homes. Three multi-family residential units would be displaced by the Proposed project; however, these units are entirely surrounded by limited manufacturing and office uses and are not within an established single-family area. Additionally, the Project would provide a total of 454 permanent supportive housing units resulting in a net increase of housing. Therefore, the Proposed Project is consistent with this policy.	
2016-2040 RTP/SCS Land Use Policy 8 Ensure adequate access to open space and preservation of habitat.	<b>Consistent.</b> 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 three commercial buildings, three single-family residential buildings, and one surface parking lot. The Proposed Project would provide 36,580 square feet of open space that equals the required amount pursuant to the LAMC, utilizing a 20 percent reduction per the SNAP. Therefore, the Proposed Project is consistent with this policy.	

Table 4.2Consistency Analysis with the2016-2040 Regional Transportation Plan / Sustainable Community Strategy

2010-2040 Regional transportation Fian / Sustainable Community Strategy		
Goals and Policies	Consistency Assessment	
2016-2040 RTP/SCS Land Use Policy 9 Incorporate	Not Applicable. This Land Use Policy is directed	
local input and feedback on future growth.	towards SCAG and not does apply to the Proposed	
	Project. No further discussion is required.	
2016-2040 RTP/SCS Benefit 1: The RTP/SCS will	<b>Consistent.</b> The Proposed Project will provide multi-	
promote the development of better places to live and	family housing to an existing, transit-accessible area.	
work through measures that encourage more	The Proposed Project would provide a variety of	
compact development in certain areas of the region,	dwelling unit sizes including studio, one-bedroom, and	
varied housing options, bicycle and pedestrian	two-bedroom units that accommodate a range of	
improvements, and efficient transportation	households. In addition, the Proposed Project will	
infrastructure.	provide bicycle parking and various pedestrian-	
	oriented improvements, including improved	
	sidewalks. Therefore, the Proposed Project is	
	consistent with this policy.	
2016 RTP/SCS Benefit 2: The RTP/SCS will	Not Applicable. This benefit is directed towards	
encourage strategic transportation investments that	SCAG and does not apply to the Proposed Project. No	
add appropriate capacity and improve critical road	further discussion is required.	
conditions in the region, increase transit capacity and		
expand mobility options. Meanwhile, the Plan		
outlines strategies for developing land in coming		
decades that will place destinations closer together,		
thereby decreasing the time and cost of traveling		
between them.	Consistent The Drenesed Dreiset includes	
to result in less energy and water consumption	consistent. The Proposed Project includes	
across the region as well as lower transportation	ENERGY STAR-rated appliances. It would comply	
costs for households	with the City of Los Angeles Green Building Code, the	
	California Green Building Code and includes	
	requirements for a green or high albedo roof and that	
	at least five percent of all parking spaces on-site be	
	capable of future electric vehicle (EV) charging	
	stations and approximately 5,780 square feet of solar	
	panels. The Proposed Project's incorporation of	
	bicycle-and pedestrian-friendly elements and location	
	near various bus lines will provide future residents with	
	various affordable transportation options. Therefore,	
	the Proposed Project is consistent with this benefit.	
2016 RTP/SCS Benefit 4: Improved placemaking	Consistent. The Proposed Project will encourage	
and strategic transportation investments will help	improved access and mobility by providing residential	
improve air quality; improve health as people have	uses with access to various transit options, which will	
more opportunities to bicycle, walk and pursue other	encourage the use of existing and proposed mass	
active alternatives to driving; and better protect	transit. The Proposed Project also includes 36,580	
natural lands as new growth is concentrated in	square feet of open space including ground level	
existing urban and suburban areas.	courtyards as well as community rooms. Recreational	
	amenities would include building lobbies, computer	
	rooms, fitness rooms, and community rooms. These	
	areas provide the opportunity for Project residents and	
	visitors to gather.	
Source: Southern California Association of Governme	nts, 2016-2040 RTP/SCS, April 2016.	

# Table 4.2Consistency Analysis with the2016-2040 Regional Transportation Plan / Sustainable Community Strategy

#### Consistency with Criterion #2

#### Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.

The Proposed Project includes the construction, operation, and maintenance of a total floor area of 247,812 square feet of floor area with 454 dwelling units. The Proposed Project includes resident supportive service space (which encompasses approximately 11,772 square feet of social services and case management uses) representing 4.7 percent of the total proposed floor area. As such, approximately 95 percent of the Proposed Project's floor area is dedicated to residential. Therefore, the Project would be consistent with this Criterion.

#### Consistency with Criterion #3

#### Provides a minimum net density of at least 20 units per acre.

The Project Site has a buildable area of approximately 2.01 acres. The Proposed Project includes 454 dwelling units and therefore provides approximately 226 dwelling units per acre. As such, the Proposed Project would be consistent with this Criterion.

#### **Consistency with Criterion #4**

## Is within one-half mile of a Major Transit Stop or High-Quality Transit Corridor included in a regional transportation plan.

Public Resources Code (PRC) Section 21155 (b) defines a "High-Quality Transit Corridor" as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

PRC Section 21064.3 defines a "Major Transit Stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21155 (b) states that a "Major Transit Stop" is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes Major Transit Stops that are included in the applicable regional transportation plan.

Project Site is located approximately 500 feet of the intersection of Vermont and Beverly, which provides access to Vermont/Beverly Rail Station, a major transit stop that provides transfer opportunities to other Metro rail services, Amtrak, Metrolink, as well as numerous

buses routes. The bus lines within approximately one-quarter mile of the Project include Metropolitan Transit Authority (Metro) Rapid 780 and Metro Local Lines , 10, 14, 201, 204, 754. The LADOT DASH line (DASH Wilshire Center/Koreatown) runs along Vermont Avenue, with the nearest bus stop located at W. 1<sup>st</sup> Street. The Project Site is also located within one-half mile of numerous bus routes with peak commute service intervals of 15 minutes or less along Vermont Avenue, Beverly Boulevard, Melrose Avenue, and W. First Street. Because the Vermont/Beverly Rail Station and numerous bus stops qualify as Major Transit Stop and High Quality Transit Corridor that are within one-half mile of the Project Site, the Proposed Project is consistent with this Criterion.

## 4.3 SB 375 Streamlining Benefits

Pursuant to PRC Section §21155.2(a), if the Proposed Project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to PRC Section 21081, shall be eligible for either the provisions of subdivision (b) (sustainable communities' environmental assessment) or (c) (limited analysis EIR). The Proposed Project would follow subdivision (b), and the Proposed Project would be reviewed through a sustainable communities' environmental assessment (SCEA), which provides streamlining benefits.

PRC Section §21155.2(b) states that an initial study shall be prepared to identify all significant or potentially significant impacts of the Transit Priority Project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The initial study shall identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports. Where the lead agency determines that a cumulative effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable.

PRC Section 21159.28 states that a residential project that is consistent with the use designation, density, building intensity, and applicable policies specified for the project area pursuant to the regional RTP/SCS shall not be required to reference, describe, or discuss (1) growth inducing impacts; or (2) any project specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network.

As such, the streamlining benefits for the Proposed Project include:

- 1. Cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports shall not be treated as cumulatively considerable for the Proposed Project (PRC Section §21155.2(b)(1));
- 2. Growth-inducing impacts are not required to be referenced, described, or discussed (PRC Section §21159.28(a)); and
- 3. Project-specific or cumulative impacts from cars and light-duty truck trips generated by the Proposed Project on global warming or the regional transportation network are not required to be referenced, described, or discussed (PRC Section §21159.28(a);

The City of Los Angeles, Department of City Planning will incorporate all applicable streamlining benefits in the environmental review of the Proposed Project.

## 4.4 Scope of Analysis

Pursuant to PRC Section §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the Transit Priority Project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA is also required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. As such, this SCEA analyzes the following topics:

- Aesthetics
- Agriculture
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources

- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

### 5.1 Incorporation of Applicable Mitigation Measures from Prior EIRs

Public Resources Code Section 21151.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs, including the 2016-2040 RTP/SCS Draft Program Environmental Impact Report (RTP/SCS PEIR).

The Mitigation Monitoring and Reporting Program for the RTP/SCS PEIR (MMRP) does not include project level mitigation measures that are required of the Proposed Project. The MMRP does provide a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. The City has complied with PRC Section 21151.2 by reviewing all of the suggested mitigation measures in the MMRP and reviewed them for imposition on the Proposed Project. No mitigation measures were imposed if the Proposed Project was found to be in substantial compliance with the mitigation measure as proposed or if the MMRP mitigation measure was found not to be relevant. If the Proposed Project was not found to be in substantial compliance or the mitigation measure or an equally effective City mitigation measure. The City's analysis is found in Table 5.1 below.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
Aesthetics	Project-Level Mitigation Measure	
Scenic Vista	MM-AES-1(b): Consistent with the provisions of	This Mitigation Measure is not
	Section 15091 of the State CEQA Guidelines,	applicable to the Proposed Project
	SCAG has identified mitigation measures capable	as Public Resources Code Section
	of avoiding or reducing the significant effects of	21099, enacted by Senate Bill 743,
	visual intrusions on scenic vistas, or National	provides that "aesthetic and parking
	Scenic Byways that are in the jurisdiction and	impacts of a residential, mixed-use
	responsibility of Caltrans, other public agencies,	residential, or employment center
	and/or Lead Agencies. Where the Lead Agency	project on an infill site within a Transit
	has identified that a project has the potential for	Priority Area shall not be considered
	significant effects, the Lead Agency can and	significant impacts on the environment."

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.</li> <li>Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.</li> <li>Use alternating facades to "break up" large facades and provide visual interest.</li> <li>Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.</li> <li>Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.</li> <li>Retain or replace trees bordering highways, so that clear-cutting is not evident.</li> <li>Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.</li> <li>Implement design guidelines, local policies, and prostiles appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.</li> <li>Implement design guidelines, local policies, and prostiles appropriate transition to existing natural forms and evelopments. Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially d</li></ul>	The Proposed Project is a residential infill development project with 454 dwelling units and 11,772 square feet of resident services uses. The Project Site is located within 500 feet of Vermont/Beverly Rail Station, a Major Transit Stop, as well as within approximately one-quarter mile of several bus line stops, including Metro Rapid 780, Metro Local Lines 10, 14, 201, 204, 754, and LADOT DASH line (DASH Wilshire Center/Koreatown), with peak commute service intervals of 15 minutes or less along Vermont Avenue, Beverly Boulevard, Melrose Avenue, and W. First Street, making it a High Quality Transit stop as well. Therefore, the Proposed Project is located in a Transit Priority Area. The Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.
Visual Character/	<b>MM-AES-3(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines.	This Mitigation Measure is not applicable to the Proposed Project.
Quality	SCAG has identified mitigation measures capable	As Public Resources Code Section

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.</li> <li>Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.</li> <li>Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.</li> <li>Design projects consistent with design guidelines of applicable general plans.</li> <li>Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable.</li> <li>Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abateme</li></ul>	21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment." As described above, the Proposed Project is located in a Transit Priority Area, and therefore, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099, and therefore no aesthetic Mitigation Measures will be required.

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
Impact	(Implemented by Lead Agency)	Applicability to the Project
	vegetation and landscape.	
Aesthetics	Project-Level Mitigation Measure	
Light/Glare/S hade	<ul> <li>MM-AES-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or minimizing the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.</li> <li>Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations.</li> <li>Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.</li> <li>Use unidirectonal lighting to avoid light trespass onto adjacent properties.</li> <li>Provide structural and/or vegetative screening from light-sensitive uses.</li> <li>Provide structural and/or vegetative screening from light-sensitive uses.</li> <li>Shield and direct all new street and pedestrian lighting surfaces and have low reflectivity to microw and glass used on building surfaces.</li> </ul>	This Mitigation Measure is not applicable to the Proposed Project. As Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment." As described above, the Proposed Project is located in a Transit Priority Area, and therefore, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099, and therefore no aesthetic Mitigation Measures will be required.
	<ul> <li>Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.</li> </ul>	

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
Agriculturo	Project Lovel Mitigation Measure	
<u>Agriculture</u> <u>and Forestry</u> Conversion of Farmland to Non- Agricultural Use, Conversion of Forest Land	Project-Level Mitigation Measure <b>MM-AF-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses that are within the jurisdiction and responsibility of the Natural Resources Conservation Service, the California Resources Agency, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Farmland Protection Act and implementing regulations, and the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the Farmland Mapping and Monitoring Program of the California Resources Agency. Such measures may include the following, or other comparable measures identified by the Lead Agency taking into account project and site-specific considerations as applicable and	This Mitigation Measure is not applicable to the Proposed Project as no farmland or agricultural activity exists on or in the vicinity of the Project Site. The Project Site as it currently exists is fully developed with three commercial buildings, three single- family residential buildings, and a surface parking lot.
	<ul> <li>feasible:</li> <li>For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act).</li> <li>Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.</li> <li>Maintain and expand agricultural land protections such as urban growth boundaries.</li> <li>Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks. Local governments would be responsible for encouraging the development of agriculture conservation easements or farmland mitigation banks, purchasing conservation agreements or farmland for mitigation, and ensuring that the terms of the conservation easement agreements are upheld. The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website</li> </ul>	

Table 5.1		
Applicability of Project-Level Mitigation Measures from the		
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy		

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	(please see https://www.wildlife.ca.gov/Conservation/Planning/ Banking)	
	"A conservation or mitigation bank is privately or publicly owned land managed for its natural resource values. In exchange for permanently protecting, managing, and monitoring the land, the bank sponsor is allowed to sell or transfer habitat credits to permitees who need to satisfy legal requirements and compensate for the environmental impacts of developmental projects.	
	A privately owned conservation or mitigation bank is a free-market enterprise that:	
	<ul> <li>Offers landowners economic incentives to protect natural resources;</li> <li>Saves permitees time and money by providing them with the certainty of pre-approved compensation lands;</li> <li>Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values;</li> <li>Provides for long-term protection and management of habitat.</li> </ul>	
	A publicly owned conservation or mitigation bank:	
	<ul> <li>Offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance."</li> </ul>	
	In 2013, the University of California published an article entitled "Reforms could boost conservation banking by landowners" that speaks specifically to the use of agricultural lands for in conjunction with conservation banking programs.	
	<ul> <li>Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.</li> </ul>	
	<ul> <li>Include underpasses and overpasses at reasonable intervals to maintain property access.</li> <li>Use berms, buffer zones, setbacks, and</li> </ul>	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.</li> <li>Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible.</li> <li>Contact the California Department of Conservation and each county's Agricultural Commissioner's office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts.</li> </ul>	
<u>Agriculture</u> <u>and Forestry</u> <i>Zoning for Ag</i> <i>Use,</i> <i>Williamson</i> <i>Act Contract</i>	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-AF-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from conflict with existing zoning for agricultural use or a Williamson Act contract that are within the jurisdiction and responsibility of the California Department of Conservation, other public agencies, and Lead Agencies. Where the Lead Agency has identified that a project has potential for significant effects, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of agriculture and forestry resources to ensure compliance with the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the California Land Conservation Act of 1965, the Farmland Security Zone Act, and county and city zoning codes, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:</li> <li>Project relocation or corridor realignment to avoid lands in Williamson Act contracts.</li> </ul>	This Mitigation Measure is not applicable to the Proposed Project as the Project Site is not zoned for agricultural production, there is no farmland on the Project Site, and there are no Williamson Act Contracts in effect for the Project Site as it currently exists is fully developed with three commercial buildings, three single- family residential buildings, and a surface parking lot.

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	(Implemented by Lead Agency)	
	<ul> <li>with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.</li> <li>Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable.</li> </ul>	
<u>Air Quality</u> Potential to Violate AQ Standard	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-AIR-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible.</li> <li>CARB, South Coast AQMD, Antelope Valley AQMD, Imperial County APCD, Mojave Desert AQMD, Ventura County APCD, and Caltrans have identified project-level feasible measures to reduce construction emissions:</li> <li>Minimize land disturbance.</li> <li>Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas.</li> <li>Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.</li> <li>Cover trucks when hauling dirt.</li> <li>Stabilize the surface of dirt piles if not removed immediately</li> </ul>	The Proposed Project would substantially conform to this Mitigation Measure. As discussed below in Section 6.3 (Air Quality), the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance with implementation of the below-listed regulatory compliance measures which have been identified by CARB and air district(s) and other agencies, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible. Although no mitigation is required, compliance with the below-listed regulatory compliance measures substantially conform to this Mitigation Measure.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>Minimize unnecessary vehicular and machinery activities.</li> <li>Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.</li> <li>On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.</li> <li>Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.</li> <li>Ensure that all construction equipment is properly tuned and maintained.</li> <li>Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.</li> <li>Project sponsors should ensure to the extent possible that construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through- traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.</li> <li>As appropriate, require that portable engines and portable engine-driven equipment tunits used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the</li> </ul>	<ul> <li>All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.</li> <li>The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.</li> <li>All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.</li> <li>All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.</li> <li>All dirt/soil of dust.</li> <li>All dirt/soil of dust.</li> <li>All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.</li> <li>Trucks having no current hauling activity shall not idle but be turned off.</li> <li>The Proposed Project shall comply with South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or</li> </ul>

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
Impact	<ul> <li>Project - Level Mitigation Measures (Implemented by Lead Agency)</li> <li>District to determine registration and permitting requirements prior to equipment operation at the site.</li> <li>Implement EPA's National Clean Diesel Program.</li> <li>Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible.</li> <li>On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity.</li> <li>If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines.</li> <li>Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines</li> <li>Convert part of the construction truck fleet to natural gas.</li> <li>Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts</li> <li>Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road)</li> <li>Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas</li> <li>Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner offroad heavy-duty diesel engines and comply with State off-road regulation</li> <li>Use on-road, heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for</li> </ul>	<ul> <li>Applicability to the Project</li> <li>transfer operations, accidental spillage, or other deposition.</li> <li>The Proposed Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).</li> <li>In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.</li> <li>In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.</li> <li>The Proposed Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.</li> <li>The Proposed Project shall comply with South Coast Air Quality Management District Rule 1108 limiting the volatile organic</li> </ul>
	<ul> <li>Use on-road, heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation</li> <li>Use idle reduction technology, defined as a device that is installed on the vehicle that enterprise indication.</li> </ul>	<ul> <li>Management District Rule 1108 limiting the volatile organic compound content from cutback asphalt.</li> <li>The Proposed Project shall install odor-reducing equipment in accordance with South Coast Air</li> </ul>
	is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is	<ul> <li>Quality Management District Rule 1138.</li> <li>New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control</li> </ul>

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
mpaor	(Implemented by Lead Agency)	
Impact	<ul> <li>Project - Level Mitigation Measures (Implemented by Lead Agency)</li> <li>stationary</li> <li>Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3 minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit.</li> <li>Prohibit diesel idling within 1,000 feet of sensitive receptors.</li> <li>Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.</li> <li>The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.</li> <li>The engine size of construction equipment shall be the minimum practical size.</li> <li>Catalytic converters shall be installed on gasoline-powered equipment.</li> <li>Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit.</li> <li>Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite.</li> <li>Use new or rebuilt equipment.</li> <li>Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be check by an ASE-certified mechanic and determined to be running in proper condition before it is operated.</li> <li>Use low rolling resistance tires on long haul class 8 tractor-trailers.</li> <li>Suspend all construction activities that generate air pollutant emissions during air alerts.</li> </ul>	Applicability to the Project measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.
	<ul> <li>Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.</li> </ul>	
Air Quality	Project-Level Mitigation Measure	
Expose	MM-AIR-4(b): Consistent with the provisions of	This Mitigation Measure is not
Sensitive	Section 15091 of the State CEQA Guidelines,	applicable to the Project, as the
Receptors to	song has identified mitigation measures that are within the jurisdiction and authority of the air quality	Proposed Project does not involve a 2016-2040 RTP/SCS transportation
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Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>Equipment</li> <li>Cleaner In-Use Off-Road Equipment</li> <li>Agricultural Equipment Fleet Modernization</li> <li>New Emission Standards for Recreational Boats</li> <li>Off-Road Recreational Vehicle Expanded Emission Standards</li> </ul>	
Biological Resources Adverse Effect on Candidate, Sensitive, or Special Status Species, Adverse Effect on Riparian Habitat or Other Sensitive Natural Community, Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting	Project-Level Mitigation Measure <b>MM-BIO-1(b)</b> : Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on threatened and endangered species and other special status species that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Sections 7, 9, and 10(a) of the federal Endangered Species Act; the California Endangered Species Act; the Native Plant Protection Act; the State Fish and Wildlife Code; and the Desert Native Plant Act; and related applicable implementing regulations, as applicable and feasible. Additional compliance should adhere to applicable implementing regulations from the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and/or the California Department of Fish and Wildlife. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Require project design to avoid occupied habitat, netantially, auitable habitat, and designated	This Mitigation Measure is not applicable to the Proposed Project as the Project Site does not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. The Project Site is located in an urbanized area of the City. The Project Site is improved with three commercial buildings, three single-family residential buildings, a commercial office building and a paved surface parking lot. The Project would result in the removal and replacement of three on-site non-protected trees and one street tree within the right-of-way. With regard to avoiding potentially significant effects related to any nesting native birds that may occur within any trees proposed for removal, the City will require the following regulatory compliance measure:
Protecting Biological Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other	<ul> <li>potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.</li> <li>Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act to support issuance of an Incidental take permit. A wide variety of conservation strategies have been successfully used in the SCAG region to</li> </ul>	<ul> <li>Habitat Modification (Nesting Native Birds)</li> <li>Under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13) and Sections 3503, 3503.5 and 3513 of the California Fish and Wildlife Code, Proposed Project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding</li> </ul>

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

	Project – Level Mitigation Measures	
Impact	(Implemented by Lead Agency)	Applicability to the Project
Conservation Plan	<ul> <li>protect the survival and recovery in the wild of federally and state-listed endangered species including the bald eagle: <ul> <li>Avoidance strategies</li> <li>Contribution of in-lieu fees</li> <li>Use of mitigation bank credits</li> <li>Funding of research and recovery efforts</li> <li>Habitat restoration</li> <li>Conservation easements</li> <li>Permanent dedication of habitat</li> <li>Other comparable measures</li> </ul> </li> <li>Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.</li> <li>Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regard to avoiding and minimizing impacts on sensitive biological resources.</li> <li>Appoint an Environmental Inspector to monitor implementation of mitigation measures.</li> <li>Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.</li> <li>Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance.</li> <li>Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.</li> </ul>	<ul> <li>bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill or attempt to hunt, pursue, catch, capture of kill (Fish and Wildlife Code Section 86).</li> <li>If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:</li> <li>Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.</li> <li>If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.</li> <li>Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no</li> </ul>

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Impact	Project – Level Mitigation Measures	Applicability to the Project
	(Implemented by Lead Agency)	avidance of a second attempt at
		<ul> <li>evidence of a second altempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.</li> <li>The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.</li> </ul>
		Although, no mitigation is required due to the lack of protected habitat and species on the fully developed Project Site, compliance with the above-listed regulatory compliance measures substantially conforms to this Mitigation Measure.
Biological Resources Adverse Effect on Riparian Habitat or Other Sensitive Natural Community, Adverse Effect on Wetlands, Interfere with	Project-Level Mitigation Measure <b>MM-BIO-2(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on state-designated sensitive habitats, including riparian habitats, that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 1600 of the State Fish and	This Mitigation Measure is not applicable to the Proposed Project as the Project Site does not contain any critical habitat, including riparian, or any wetlands, nor does it support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. The Project Site is located in an urbanized area of the City. The Project Site is improved with three
Movement of Species, Conflict with Local	Wildlife Code, USFS Land Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino, implementing regulations for the U.S.	commercial buildings, three single- family residential buildings, and a paved surface parking lot. The Project Site and its vicinity are not part of any
Policies or Ordinances Protecting Biological	Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other related federal, state, and local regulations, as applicable and feasible.	draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.

Impact	Project – Level Mitigation Measures	Applicability to the Project
Impact Resources, Conflict with Habitat Conservation Plan, Natural Conservation Plan, or Other Conservation Plan	<ul> <li>Project - Level Mitigation Measures (Implemented by Lead Agency)</li> <li>Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act.</li> <li>Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act.</li> <li>Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.</li> <li>Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the State Fish and Wildlife Code.</li> <li>Consult with the CDFW pursuant to the state Fish and Wildlife Code.</li> <li>Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season.</li> <li>Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the formation and the state-designated sensitive or riparian habitats where fur-bearing mammal</li></ul>	Applicability to the Project Therefore, no impact would occur with implementation of the Proposed Project, and no mitigation is required.
	<ul> <li>sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Wildlife Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.</li> <li>Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and</li> </ul>	

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Impact	Project – Level Mitigation Measures	Applicability to the Project
	<ul> <li>invasive plants including, but not limited to, the <i>Manual of California Vegetation</i>, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate.</li> <li>Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.</li> <li>Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats.</li> <li>Install fencing and/or mark sensitive habitat to be avoided during construction activities.</li> <li>Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of temporary disturbance within the project area.</li> <li>Revegetate with appropriate native vegetation following the completion of construction activities.</li> <li>Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).</li> <li>Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.</li> </ul>	
Biological Resources Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or	Project-Level Mitigation Measure <b>MM-BIO-3(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 404 of the Clean Water Act	This Mitigation Measure is not applicable to the Proposed Project as the Project Site is not located on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies.

_	Project – Level Mitigation Measures	
Impact	(Implemented by Lead Agency)	Applicability to the Project
Impact Ordinances Protecting Biological Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan	<ul> <li>Project – Level Mitigation Measures (Implemented by Lead Agency)</li> <li>and regulations of the U.S. Army Corps of Engineers (USACOE), and other applicable federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible.</li> <li>Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB). Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible,</li> </ul>	Applicability to the Project
	standards for the three sources of compensatory	

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>mitigation: <ul> <li>Permitee-responsible mitigation</li> <li>Contribution of in-lieu fees</li> <li>Use of mitigation bank credits</li> </ul> </li> <li>Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether wetlands will be affected and, if necessary, perform a formal wetland delineation.</li> </ul>	
Biological Resources Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Biological Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-BIO-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations, goals and polices of counties and cities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur.</li> <li>Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six- County area: Angeles, Cleveland, Los Padres, and San Bernardino.</li> <li>Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement.</li> </ul>	This Mitigation Measure is not applicable to the Proposed Project as the Project Site is not located within or adjacent to migratory fish, wildlife species, or established native resident and/or migratory wildlife corridors, and native wildlife nursery sites. The Project Site is improved with three commercial buildings, three single-family residential buildings, and a paved surface parking lot and located in an urbanized area of the City. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project, and no mitigation is required.

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luura e et	Project – Level Mitigation Measures	Angliashilita ta tha Duais at
Impact	(Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded</li> </ul>	
	protection pursuant to Title 14 § 460 of the	
	California Code of Regulations protecting fur-	
	bearing mammals, during the breeding season.	
	Prohibit clearing of vegetation and construction	
	within the peak avian breeding season (February 1 <sup>st</sup> through September 1 <sup>st</sup> ), where feasible.	
	Conduct weekly surveys to identify active raptor	
	and other migratory nongame bird nests by a	
	qualified biologist with experience in conducting	
	breeding bird surveys within three days prior to	
	the work in the area from February 1 through August 31.	
	Prohibit construction activities with 300 feet (500	
	feet for raptors) of occupied nests of birds	
	afforded protection pursuant to the Migratory	
	Bird Treaty Act, during the breeding season.	
	Delineate the non-disturbance buffer by	
	until construction is complete, or the pest is no	
	longer active. No construction shall occur within	
	the fenced nest zone until the young have	
	fledged, are no longer being fed by the parents,	
	have left the nest, and will no longer be	
	impacted by the project. Reductions or	
	appropriate depending on the avian species	
	involved ambient levels of human activity	
	screening vegetation, or possibly other factors.	
	• Ensure that suitable nesting sites for migratory	
	nongame native bird species protected under	
	the Migratory Bird Treaty Act and/or trees with	
	unoccupied raptor nests should only be removed	
	season.	
	Conduct site-specific analyses of opportunities	
	to preserve or improve habitat linkages with	
	areas on- and off-site. Analyze habitat	
	linkages/wildlife movement corridors on a	
	broader and cumulative impact analysis scale to	
	have potential for impacts on a broader scale or	
	critical narrow choke points that could reduce	
	function of recognized movement corridors on a	
	larger scale. Require review of construction	
	drawings and habitat connectivity mapping	
	provided by the CDFW or CNDDB by a qualified biologist to determine the risk of babitat	

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Impact	Project – Level Mitigation Measures	Applicability to the Project
	(Implemented by Lead Agency)	
	<ul> <li>Durcue mitigation banking to preserve babitat</li> </ul>	
	<ul> <li>Fursue miligation banking to preserve habitat linkages and corridors (opportunities to</li> </ul>	
	nurchase maintain and/or restore offsite	
	habitat)	
	<ul> <li>Demonstrate that proposed projects would not</li> </ul>	
	adversely affect movement of any native	
	resident or migratory fish or wildlife species.	
	wildlife movement corridors, or wildlife nurserv	
	sites through the incorporation of avoidance	
	strategies into project design, wherever	
	practicable and feasible.	
	<ul> <li>Evaluate the potential for overpasses,</li> </ul>	
	underpasses, and culverts in cases where a	
	roadway or other transportation project may	
	interrupt the flow of species through their	
	habitat. Provide wildlife crossings in	
	accordance with proven standards, such as	
	Mitigation Guidelines and in consultation with	
	wildlife corridor authorities with sufficient	
	knowledge of both regional and local wildlife	
	corridors, and at locations useful and	
	appropriate for the species of concern.	
	<ul> <li>Install wildlife fencing where appropriate to</li> </ul>	
	minimize the probability of wildlife injury due to	
	direct interaction between wildlife and roads or	
	construction.	
	• Establish native vegetation and facilitate the	
	enhancement and maintenance of biological	
	diversity within existing habitat pockets in urban	
	environments that provide connectivity to large-	
	• Where avoidance is determined to be	
	<ul> <li>where avoidance is determined to be infeasible design sufficient conservation</li> </ul>	
	measures through coordination with local	
	agencies and the regulatory agency (i.e.,	
	USFWS or CDFW) and in accordance with the	
	respective counties and cities general plans to	
	establish plans to mitigate for the loss of fish	
	and wildlife movement corridors and/or wildlife	
	nursery sites. The consideration of conservation	
	measures may include the following measures,	
	1(b) where applicable:	
	ען), where applicable. ∩ Wildlife movement huffer zones	
	<ul> <li>Corridor realignment</li> </ul>	
	<ul> <li>Appropriately spaced breaks in center</li> </ul>	
	barriers	

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>Stream rerouting</li> <li>Culverts</li> <li>Creation of artificial movement corridors such as freeway under- or overpasses</li> <li>Other comparable measures</li> <li>Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.</li> <li>Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species.</li> <li>Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas.</li> </ul>	
Biological Resources Conflict with Local Policies or Ordinances Protecting Biological Resources, Conflict with Habitat Conservation Plan, Natural Conservation Plan, or	Project-Level Mitigation Measure <b>MM-BIO-5(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as	This Mitigation Measure is not applicable to the Proposed Project as the Project Site is completely paved and developed, and no significant vegetation exists, including protected trees. No protected biological resources or tree species, such as oak trees, currently exist on the Project Site. As such, none of the mitigation measures that pertain to local policies or ordinances protecting biological resources, such as the City of Los Angeles Protected Tree Ordinance, are applicable. The Project Site and its vicinity are not part of any draft or

Impact	Project – Level Mitigation Measures	Applicability to the Project
impact	(Implemented by Lead Agency)	
Other Conservation Plan	<ul> <li>(Inperience by Lead Agency)</li> <li>applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.</li> <li>Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist.</li> <li>If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species.</li> <li>Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree.</li> <li>Where proposed development or other site work could encroach upon the protected perimeter of any protected tree and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter of any protected tree.</li> <li>Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no burning on the protected perimeter of any protected trees, or any other location on the site from which such substances that may be harmful to trees occur from the base of any protecte</li></ul>	adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project, and no mitigation is required.
	materials be operated or stored within a	

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Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.</li> <li>Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration.</li> <li>If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed.</li> <li>Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations.</li> <li>Design projects to avoid conflicts with local policies and ordinances protecting biological resources.</li> <li>Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:         <ul> <li>Avoidance strategies</li> <li>Contribution of in-lieu fees</li> <li>Planting of replacement trees at a minimum ratio of 2:1</li> <li>Re-landscaping areas with native vegetation post-construction</li> <li>Other comparable measures</li> </ul> </li> </ul>	
<u>Biological</u> <u>Resources</u>	Project-Level Mitigation Measure MM-BIO-6(b): Consistent with the provisions of	This Mitigation Measure is not applicable to the Proposed Project as
Conflict with	Section 15091 of the State CEQA Guidelines,	no locally designated natural
Habitat	SCAG has identified mitigation measures capable	communities are known to occur on or
Conservation	of avoiding or reducing the significant impacts on	adjacent to the Project Site. The Project
Plan, Natural	HCP and NCCPs that are in the jurisdiction and	Site and its vicinity are not part of any
Community	responsibility of public agencies and/or Lead	dratt or adopted Habitat Conservation

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
impaot	(Implemented by Lead Agency)	
Conservation Plan, or Other Conservation Plan	<ul> <li>Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act; and implementing regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs.</li> <li>Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program.</li> <li>Where avoidance is determined to be infeasible, sufficient conservation program.</li> <li>Where all initiate to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in MM-BIO-1(b), where applicable.</li> </ul>	Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project, and no mitigation is required.
<u>Cultural</u> <u>Resources</u> Potential to Destroy Unique Paleontologic al Resources or Unique Geological Features	Project-Level Mitigation Measure <b>MM-CUL-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent	The Proposed Project would substantially conform to this Mitigation Measure. It is not anticipated that the Project Site contains unique paleontological resources or sites and unique geologic features. However, if unexpected discovery should occur compliance with the following regulatory compliance measure, which is capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features, are

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
Impact	<ul> <li>(Implemented by Lead Agency)</li> <li>with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature.</li> <li>Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources.</li> <li>Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible:         <ul> <li>All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.</li> <li>Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologis to oversee the implementation of the PRMP.</li> <li>Monitor blasting and earth-moving activities in parent material, with a moderate to high potentied to yield unique paleontological resources are encounter</li></ul></li></ul>	<ul> <li>Applicability to the Project</li> <li>equal to or more effective than this mitigation measure:</li> <li>Under California Public Resources Code Sections 5097.5 and 30244, if any paleontological materials are encountered during the course of project development, all further development activities shall halt and:</li> <li>The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Long Beach, or the Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.</li> <li>The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.</li> <li>The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.</li> <li>Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.</li> </ul>
Table 5.1		
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Applicability of Project-Level Mitigation Measures from the		
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy		

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.</li> <li>Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross- trained in paleontology) to be present during earth-moving activities or blasting in these areas.</li> <li>Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance.</li> <li>Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.</li> </ul>	
<u>Cultural</u> <u>Resources</u> Substantial Adverse Change in Significance of a Historical Resource, Substantial Adverse Change in the Significance of an Archaeologic al Resource	<ul> <li><u>Project-Level Mitigation Measure</u></li> <li><u>MM-CUL-2(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on historical resources, to ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the</li> </ul>	The Proposed Project would substantially conform to this Mitigation Measure. The Project does not involve and will not affect any historic resources. Further, it is not anticipated that the Project Site contains significant archaeological resources. However, if an unexpected discovery should occur compliance with the following regulatory compliance measure, which is consistent with the SCAG RTP/SCS Program EIR MM- CUL-2(b)CUL in avoiding potential impacts to inadvertent finds of historic or archeological cultural resources: • Cultural Resources (Archaeological Resources): In the event that archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the Proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's

Table 5.1		
Applicability of Project-Level Mitigation Measures from the		
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy		

<ul> <li>Project area has been previously surveyed and whether historic resources were identified.</li> <li>Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project.</li> <li>Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their adention Officer in evaluate the impact historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preservition, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preservition, Restoring, Rehabilitating, Restoring, and</li> </ul>
<ul> <li>Professional Qualification</li> <li>Professional Qualification</li> <li>Professional Qualification</li> <li>Standards, can evaluate the</li> <li>significance of the find and</li> <li>determine whether additional study</li> <li>is warranted by the Information Center. In the</li> <li>event the records indicate that no previous</li> <li>survey has been conducted, the Information</li> <li>Center will make a recommendation on whether</li> <li>a survey is warranted based on the sensitivity of</li> <li>the project area for historical resources within</li> <li>1,000 feet of the project.</li> <li>Comply with Section 106 of the National Historic</li> <li>Preservation Act including, but not limited to,</li> <li>projects for which federal funding or approval is</li> <li>requires federal agencies to evaluate the impacts and developing mitigation. These</li> <li>mitigation measures may include, but are not</li> <li>limited to the following:</li> <li>Employ design measures to avoid</li> <li>historical resources are to be preserved,</li> <li>as feasible. If resources are to be preserved,</li> <li>as feasible, carry out the maintenance,</li> <li>repair, stabilization, rehabilitation,</li> <li>restoration, preservation of reconstruction in a manner consistent with</li> <li>the Secretary of the Interior's Guidelines for</li> <li>Preserving, Rehabilitating, Restoring, and</li> </ul>
Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. • Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	<ul> <li>sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site.</li> <li>Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified.</li> <li>Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property.</li> <li>Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resources are found until a qualified archaeologist can determine the importance of a resource.</li> </ul>	
<u>Cultural</u> <u>Resources</u> Disturb Human Remains	MM-CUL-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to	The Proposed Project would substantially conform to this Mitigation Measure. It is not anticipated that the Project Site will

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	human remains that are within the jurisdiction and responsibility of the Native American Heritage	disturb human remains. However, if an unexpected discovery should occur
	Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified	compliance with the following regulatory compliance measure, which
	that a project has the potential for significant effects, the Lead Agency should consider mitigation	is capable of avoiding or reducing significant impacts on historical
	measures capable of avoiding or reducing	resources within the jurisdiction and
	compliance with the California Health and Safety	Preservation, Native American Heritage
	Native American Heritage Commission, as	and/or Local Agencies:
	include the following, or other comparable measures	Cultural Resources (Human
	identified by the Lead Agency:	Remains): If human remains are encountered unexpectedly during
	<ul> <li>In the event of discovery or recognition of any human remains during construction or</li> </ul>	construction demolition and/or grading activities, State Health and
	excavation activities associated with the project, in any location other than a dedicated cemetery.	Safety Code Section 7050.5 requires that no further disturbance
	cease further excavation or disturbance of the site or any nearby area reasonably suspected to	shall occur until the County Coroner has made the necessary findings as
	overlie adjacent human remains until the	to origin and disposition pursuant to
	discovered has been informed and has determined that no investigation of the cause of	(PRC) Section 5097.98. In the
	death is required.	discovered during excavation
	If any discovered remains are of Native American origin:	shall be observed:
	<ul> <li>Contact the County Coroner to contact the Native American Heritage Commission to</li> </ul>	• Stop Immediately and contact the County Coroner:
	ascertain the proper descendants from the deceased individual. The coroner should	1104 N. Mission Road Los Angeles, CA 90033
	make a recommendation to the landowner or the person responsible for the excavation	323-343-0512 (8 a.m. to 5 p.m. Monday
	work, for means of treating or disposing of, with appropriate dignity, the human remains	through Friday) or 323-343-0714
	and any associated grave goods. This may include obtaining a gualified archaeologist or	(After Hours, Saturday, Sunday, and Holidays)
	team of archaeologists to properly excavate	<ul> <li>If the remains are determined to be of Native American descent.</li> </ul>
	<ul> <li>If the Native American Heritage</li> <li>Commission is unable to identify a</li> </ul>	the Coroner has 24 hours to notify the Native American
	descendant, or the descendant failed to	Heritage Commission (NAHC).
	after being notified by the commission,	notify the person it believes to
	obtain a Native American monitor, and an	be the most likely descendent
	archaeologist, if recommended by the Native	ot the deceased Native American.
	American human remains and any	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur:</li> <li>The Native American Heritage Commission is unable to identify a descendent;</li> <li>The descendant identified fails to make a recommendation; or</li> <li>The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to the landowner.</li> </ul>	<ul> <li>The most likely descendent 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.</li> <li>If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.</li> <li>Compliance with the above-listed regulatory compliance measures substantially conforms to this Mitigation Measure, and would reduce any potentially significant impacts.</li> </ul>
<u>Energy</u> Increase Residential Energy Use, Increase Building Energy Use	<ul> <li><u>Project-Level Mitigation Measure</u></li> <li><u>MM-EN-2(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with CALGreen, local building codes, and other applicable laws and regulations governing residential building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including:         <ul> <li>Use energy efficient materials in building design, construction, rehabilitation, and retrofit.</li> <li>Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.</li> <li>Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs,</li> </ul> </li> </ul>	The Proposed Project would substantially conform to this Mitigation Measure. With compliance with regulatory compliance measures, the Proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Proposed Project construction or operation or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The following regulatory compliance measure(s), which is capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies, substantially complies with this Mitigation Measure: • Energy (Green Building Code): In accordance with the City of Los Angeles Green Building Code), the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Building

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>trees for shade, and sunlight.</li> <li>Incorporate passive environmental control systems that account for the characteristics of the natural environment.</li> <li>Use high-efficiency lighting and cooking devices.</li> <li>Incorporate passive solar design.</li> <li>Use high-reflectivity building materials and multiple glazing.</li> <li>Prohibit gas-powered landscape maintenance equipment.</li> <li>Install electric vehicle charging stations.</li> <li>Reduce wood burning stoves or fireplaces.</li> <li>Provide bike lanes accessibility and parking at residential developments.</li> </ul>	Code and as it may be subsequently amended or modified.
<u>Geology and</u> <u>Soils</u> Adverse Effects due to Earthquake or Other Seismic Activity, Unstable Geologic Unit or Soil, Expansive Soil	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-GEO-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the</li> </ul>	<ul> <li>The Proposed Project would substantially conform to this Mitigation Measure. As described in Section 6.7 (Geology and Soils) below, the Proposed Project will not result in significant impacts with implementation of the following regulatory compliance measure(s), which is capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related groundfailure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies:</li> <li>Geology (Seismic): The design and construction of the project shall conform to the California Building and Safety.</li> <li>Geology (Geotechnical Investigation): The Proposed Project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed</li> </ul>

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
•	(Implemented by Lead Agency)	national and the many he
	<ul> <li>fault.</li> <li>Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC.</li> </ul>	project, and as it may be subsequently amended or modified. Although no mitigation is required, compliance with the above-listed regulatory compliance measures substantially conforms to this Mitigation Measure.
	• Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas.	
	<ul> <li>Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards.</li> </ul>	
	<ul> <li>Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site- specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical</li> </ul>	

Impact	(Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>measures to eliminate any problems.</li> <li>Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides.</li> <li>Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.</li> </ul>	
<u>Geology and</u> <u>Soils</u> Soil Erosion or Loss of Topsoil	Project-Level Mitigation Measure <b>MM-GEO-2(b)</b> : Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing	The Proposed Project would substantially conform to this Mitigation Measure. As described in Section 6.7 (Geology and Soils) below, the Proposed Project will not result in significant impacts with implementation of the following regulatory compliance measure(s), which are capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies:
	<ul> <li>building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site- specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These</li> </ul>	<ul> <li>Site grading is regulated under Chapter IX, Division 70 of the Los Angeles Municipal Code.</li> <li>Geology (Erosion/Grading/Short- Term Construction Impacts): The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the</li> </ul>

 Table 5.1

 Applicability of Project-Level Mitigation Measures from the

 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

 Project - Level Mitigation Measures

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potential failure and recommend remedial

geotechnical measures to eliminate any

Consistent with the requirements of the State

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
Impact	(Implemented by Lead Agency)	Applicability to the Troject
	<ul> <li>(Implemented by Lead Agency)</li> <li>Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following:         <ul> <li>File a Notice of Intent (NOI) with the SWRCB.</li> <li>Prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.</li> <li>Submit to the RWQCB a copy of the SWPPP and evidence of submittal of the NOI to the SWRCB. Implementation of the SWPPP should start with the commencement of construction and continue through the completion of the project.</li> <li>After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB.</li> </ul> </li> <li>Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.</li> <li>Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.</li> </ul>	<ul> <li>permits from the Department of Building and Safety. The Applicant shall implement Best Management Practices ("BMPs") during grading and excavation to reduce erosion, including, but not limited to the following:         <ul> <li>Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.</li> <li>Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio- degradable soil stabilizer.</li> </ul> </li> <li>Hydrology (National Pollutant Discharge Elimination System General Permit): Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Proposed Project. The Applicant shall 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 shall be prepared and implemented for the Proposed</li> </ul>

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Imnact	Project – Level Mitigation Measures	Applicability to the Project
inpact	(Implemented by Lead Agency)	
		<ul> <li>Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices 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.</li> <li>Although no mitigation is required, compliance with the above-listed regulatory compliance measures substantially conforms to this Mitigation Measure.</li> </ul>
<u>Greenhouse</u> <u>Gases</u> <i>Cumulative</i> <i>Impacts, Forest</i> <i>Land</i> <i>Conversion</i>	<ul> <li><u>Project-Level Mitigation Measure</u></li> <li><b>MM-GHG-3(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting greenhouse gas mitigation measures that have been used for projects in the SCAG region as set forth below, or through comparable measures identified by Lead Agency:</li> </ul>	The Proposed Project would substantially conform to this Mitigation Measure. The Proposed Project is located on an infill development site that is currently improved with three commercial buildings, three single-family residential buildings, an office building, and a surface parking lot. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development. Further, the Proposed Project is substantially consistent with the applicable policies and/or regulations outlined in the Scoping Plan, SB 375, SCAG's 2016 RTP/SCS, and the L.A. Green Building Code, and thus no mitigation is required. The Proposed Project's project design features and compliance with regulatory compliance measures that are capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of oreenhouse cases that are within the

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
Impact	<ul> <li>Project – Level Mitigation Measures (Implemented by Lead Agency)</li> <li>required as part of the Lead Agency's decision.</li> <li>Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.</li> <li>Off-site measures to mitigate a project's emissions.</li> <li>Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:         <ul> <li>Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction;</li> <li>Use alternative (non-petroleum based) fuels;</li> <li>Deployment of zero- and/or near zero emission technologies as defined by CARB;</li> <li>Use lighting systems that are energy efficient, such as LED technology;</li> <li>Use the minimum feasible amount of GHG- emitting construction materials that is feasible;</li> <li>Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production;</li> <li>Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse;</li> <li>Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy;</li> </ul> </li> </ul>	<ul> <li>Applicability to the Project</li> <li>jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies, substantially conforms to this Mitigation Measure:</li> <li>The following is a list of project design features and regulatory compliance measures that substantially conform to this Mitigation Measure:</li> <li>The Project must meet Title 24 2016 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the multi-family dwelling units.</li> <li>The Project is subject to construction waste reduction of at least 50 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.</li> <li>As mandated by the LA Green Building Code, the Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that</li> </ul>
	<ul> <li>measures to reduce energy consumption and increase production and use of renewable energy;</li> <li>Incorporate design measures like WaterSense fixtures and water capture to reduce water consumption;</li> <li>Use lighter-colored pavement where feasible;</li> <li>Recycle construction debris to maximum extent feasible;</li> <li>Protect and plant shade trees in or near construction projects where feasible; and</li> <li>Solicit bids that include concents listed</li> </ul>	<ul> <li>within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.</li> <li>The Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use</li> </ul>
	above.	of renewable energy

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles.</li> <li>Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network.</li> <li>Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations.</li> <li>Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles.</li> <li>Land use siting and design measures that reduce GHG emissions, including: <ul> <li>Developing on infill and brownfields sites;</li> <li>Building high density and mixed-use developments near transit;</li> <li>Retaining on-site mature trees and vegetation, and planting new canopy trees;</li> <li>Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or neighborhood electric vehicle charging stations or neighborhood electric vehicle intworks, or charging for electric bicycles; and</li> <li>Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.</li> </ul></li></ul>	<ul> <li>The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use.</li> <li>The Project would include a minimum of five percent of the total number of parking spaces to include Electric Vehicle (EV) Charging Stations.</li> <li>The 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:         <ul> <li>Compact growth in areas accessible to transit;</li> <li>More multi-family housing;</li> <li>Jobs and housing closer to transit;</li> <li>New housing and job growth focused in High Quality Transit Areas (HQTA); and</li> <li>Biking and walking infrastructure to improve active transportation options, transit access.</li> </ul> </li> <li>Greenhouse Gas Emissions (Green Building Code): In accordance with the City of Los Angeles Green Building Code) the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified.</li> </ul>
<u>Hazards and</u> <u>Hazardous</u> <u>Materials</u> Significant Hazard due to	Project-Level Mitigation Measure <b>MM-HAZ-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to	This Mitigation Measure is not applicable to the Proposed Project. As discussed in Section 6.8 (hazards and Hazardous Materials) no

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
impact	(Implemented by Lead Agency)	Applicability to the Project
ImpactInteger Project Project Program (Implemented by Lead (Implemented by LeadRoutineRoutineRoutinethe routine transport, use or dis materials that are in the responsibility of public agend Agencies. Where the Lead Ag that a project has the potential fo the Lead Agency can and should measures to ensure compliance of the Hazardous Waste Contr Hazardous Emissions or Materials Near SchoolImpactImplemented by Lead (Implemented by Lead materials that are in the responsibility of public agend Agencies. Where the Lead Ag that a project has the potential fo the Lead Agency can and should measures to ensure compliance of the Hazardous Waste Contr Hazardous Waste Source Reduction and M Act of 1989, the California Vehic applicable laws and regulations, feasible. Such measures may in or other comparable measures id Agency:• Where the construction or o involves the transport of such mate or the transport of such mate• Where the construction or o involves the transport of ha aveid transport of such mate	<ul> <li>(Implemented by Lead Agency)</li> <li>the routine transport, use or disposal of hazardous materials that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Hazardous Waste Control Act, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, the Hazardous Waste Source Reduction and Management Review Act of 1989, the California Vehicle Code, and other applicable laws and regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.</li> <li>Where the construction or operation of projects involves the transport of hazardous material, avoid transport of such materials within one-</li> </ul>	Applicability to the Project hazardous materials other than modest amounts of typical cleaning supplies and solvents used for janitorial purposes would routinely be transported to the Project Site. The acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements. As such, no impacts would occur.
	<ul> <li>quarter mile of schools, when school is in session, wherever feasible.</li> <li>Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials.</li> </ul>	
	<ul> <li>Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project.</li> </ul>	
	<ul> <li>Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan</li> </ul>	

Table 5.1	
Applicability of Project-Level Mitigation Measures from the	
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy	

Impact	Project – Level Mitigation Measures	Applicability to the Project
impuot	(Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>should include the following: <ul> <li>The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.</li> <li>The location of such hazardous materials.</li> <li>An emergency response plan including employee training information.</li> <li>A plan that describes the manner in which these materials are handled, transported and disposed.</li> </ul> </li> <li>Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects.</li> <li>Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.</li> <li>Avoid overtopping construction equipment fuel gas tanks.</li> <li>During routine maintenance of construction equipment, properly contain and remove grease and oils.</li> <li>Properly dispose of discarded containers of fuels and other chemicals.</li> </ul>	
<u>Hazards and</u> <u>Hazardous</u> <u>Materials</u> Located on a Hazardous Materials Site Section 65962.5	Project-Level Mitigation Measure MM-HAZ-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and Clean-up Act, and the Uniform Building Code, and County and City building standards, and all applicable federal, state, and local	This Mitigation Measure is no longer applicable to the Proposed Project. As discussed in Section 6.8 (hazards and Hazardous Materials), the Project Site consisting of 614 Juanita Avenue was evaluated in a Phase I Environmental Site Assessment and a Phase II ESA (See Appendices F.1 and F.2 to this SCEA). The property at 3812-3838 Oakwood Avenue was evaluated in a separate Phase I ESA (see Appendix F3 to this SCEA). As noted in the Phase I and II ESAs for 316 Juanita Avenue, the Project Site was identified on the Cortese database as a duplicate listing to the LUST database. The historic UST and LUST cases have all been resolved.

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	laws and regulations governing hazardous waste sites, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:	The Phase I ESA for 614 Juanita Avenue concluded no evidence of recognized environmental conditions (RECs) in connection with the Subject Property were identified with the
	<ul> <li>Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.</li> <li>Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.</li> <li>Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.</li> <li>Submit a copy of all applicable documentation required by local, state, and federal environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans.</li> <li>Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.</li> <li>Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or</li> </ul>	exception of prior automotive service activities that include petroleum hydrocarbons and generate regulated wastes (used oil and other automotive fluids such as automatic transmission fluid and antifreeze) and automotive lifts. The former AT&T operations also included the operation of an in-ground oil/water separator and three aboveground hydraulic lifts. The Phase II ESA concluded that significant subsurface impacts related to the historical uses of the OWS, former wash rack, and hydraulic lifts were not identified. The soil and groundwater results show that the contaminant concentrations (e.g., TPH-DRO, TPH- ORO, and MTBE) detected in the samples collected during EBI's 2018 Phase II ESA investigation are comparable to those collected by others during previous sampling events, which was issued a no further action (NFA) determination by the RWQCB in 2009. Due to the age of structures on the Project Site, the presence of asbestos containing materials (ACM) and lead based paint (LBP) is also suspected. However, the removal and disposal of such materials would be handled in accordance with State, federal, and local regulatory compliance measures during site clearing, grading, and construction, and potential impacts associated with the release of a hazardous material would be less than significant. As such, significant impacts would not occur and no further mitigation for 614 Juanita Avenue is warranted. The Phase I ESA for 3812-3838 Oakwood Avenue concluded there is no

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.</li> <li>Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.</li> <li>Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.</li> <li>Use best management practices (BMPs) regarding potential soil and groundwater hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.</li> <li>Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.</li> <li>Prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including</li></ul>	evidence of RECs in connection with the subject property. Other environmental conditions noted in the Phase I ESA included a storm drain and three-chambered clarifier system on the central portion of 3812-3814 1/2 Oakwood Avenue, adjacent to the Galindo Commissary food truck parking area. The clarifier was installed in 1995, and is used for occasional food truck rinsing. No evidence of wash detergents or chemicals was observed onsite. Reportedly, engine and undercarriage washing are not performed onsite. While some diluted concentrations of the petroleum products and hazardous materials used on site may be present in the waste streams discharged to the drain, they drain system is not expected to represent a significant environmental concern at this time. Due to the age of structures on the Project Site, the presence of asbestos containing materials (ACM) and lead based paint (LBP) is also suspected in some of the building materials. Accordingly a thorough asbestos survey to identify asbestos-containing building materials is required in accordance with the EPA NESHAP 40 CFR Part 61 prior to demolition or renovation activities that may disturb suspect ACMs. Additionally, the requirements of OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62 would be followed prior to any demolition activities. As such, no significant impacts would occur and no further mitigation for 3812-3838 Oakwood Avenue is warranted.

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

	Project – Level Mitigation Measures	
Impact	(Implemented by Lead Agency)	Applicability to the Project
	Regional Water Quality Control Board (RWQCB),	
	have granted all required clearances and	
	confirmed that the all applicable standards,	
	regulations, and conditions have been met for	
	previous contamination at the site.	
	• Develop, train, and implement appropriate	
	worker awareness and protective measures to	
	assure that worker and public exposure is	
	minimized to an acceptable level and to prevent	
	any luther environmental contamination as a	
	If appartance antaining materials (ACM) are	
	• Il aspesios-containing materials (ACM) are	
	removed submit specifications signed by a	
	certified ashestos consultant for the removal	
	encapsulation or enclosure of the identified	
	ACM in accordance with all applicable laws and	
	regulations, including but not necessarily limited	
	to: California Code of Regulations, Title 8;	
	Business and Professions Code; Division 3;	
	California Health and Safety Code Section	
	25915- 25919.7; and other local regulations.	
	Where projects include the demolitions or	
	modification of buildings constructed prior to	
	1968, complete an assessment for the potential	
	presence or lack thereof of ACM, lead-based	
	paint (LBP), and any other building materials or	
	stored materials classified as nazardous waste by	
	• Where the remediation of lead-based paint has	
	been determined to be required provide	
	specifications to the appropriate agency, signed	
	by a certified Lead Supervisor. Project Monitor, or	
	Project Designer for the stabilization and/or	
	removal of the identified lead paint in accordance	
	with all applicable laws and regulations, including	
	but not necessarily limited to: California	
	Occupational Safety and Health Administration's	
	(Cal USHA's) Construction Lead Standard, Title	
	8 California Code of Regulations (CCR) Section	
	(DHS) Regulation 17 CCR Sections 35001	
	36100 as may be amended. If other materials	
	classified as hazardous waste by state or federal	
	law are present, the project sponsor should	
	submit written confirmation to the appropriate	
	local agency that all state and federal laws and	
	regulations should be followed when profiling,	
	handling, treating, transporting, and/or disposing	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>of such materials.</li> <li>Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.</li> </ul>	
<u>Hazards and</u> <u>Hazardous</u> <u>Materials</u> <i>Wildland Fire</i> <i>Risk</i>	Project-Level Mitigation Measure <b>MM-HAZ-8(b)</b> : Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the potential exposure of 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; that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with local general plans, specific plans, and regulations provided by County and City fire departments, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:	This Mitigation Measure is not applicable to the Proposed Project as the Project Site is located in a fully urbanized area and there are no wildlands in the vicinity. Furthermore, the Proposed Project is subject to adherence to fire code requirements.
	<ul> <li>Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures would be applied to eaves, vents, windows, and doors to avoid any gaps that would allow intrusion by flame or embers.</li> <li>Adhere to the Multi-Jurisdictional Hazards Mitigation Plan, as well as local general plans, including policies and programs aimed at reducing the risk of wildland fires through land</li> </ul>	
	<ul> <li>use compatibility, training, sustainable development, brush management, and public outreach.</li> <li>Encourage the use of fire-resistant vegetation native to Southern California and/or to the local microclimate (e.g., vegetation that has high moisture content low growth habits ignition-</li> </ul>	

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>resistant foliage, or evergreen growth), eliminate brush and chaparral, and discourage the use of fire-promoting species especially non-native, invasive species (e.g., pampas grass, fennel, mustard, or the giant reed) in the immediate vicinity of development in areas with high fire threat.</li> <li>Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of non-native, invasive species to promote healthy, natural ecosystem regrowth. Native vegetation is more likely to have deep root systems that prevent slope failure and erosion of burned areas than shallow-rooted non-natives.</li> <li>Submit a fire safety plan (including phasing) to the Lead Agency and local fire agency for their review and approval. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase.</li> <li>Utilize Fire-wise Land Management by encouraging the use of fire-resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat.</li> <li>Promote Fire Management Planning that would help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts.</li> <li>Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat.</li> </ul>	
Hydrology and Water Quality Violate Water Quality Standards or Waste Discharge Requirements, Alteration of Site Drainage Pattern, Runoff	Project-Level Mitigation Measure MM-HYD-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should	The Proposed Project would substantially conform to this Mitigation Measure. As discussed below in Section 6.10 (Hydrology and Water Quality), the Proposed Project would not result in significant impacts with implementation of the below-listed regulatory compliance measure(s), which are capable of avoiding or reducing the potential impacts on water

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project	
Exceeding Stormwater Drainage System Capacity, Otherwise Degrade Water Quality	consider mitigation measures to ensure compliance with all applicable laws, regulations, and health and safety standards set forth by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements in a manner that conforms with applicable water quality standards and/or waste discharge requirements, as applicable and feasible. Such measures may include the following, or other comparable measures identified by	quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Although no mitigation is required, compliance with the below-listed regulatory compliance measures	
	<ul> <li>the Lead Agency:</li> <li>Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.</li> <li>Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.</li> <li>Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.</li> <li>Complete, and have approved, a Standard Urban Stormwater Management Plan (SWMP), prior to occupancy of residential or commercial structures.</li> <li>Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.</li> <li>Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: <ul> <li>U.S. Army Corps of Engineers (Corps): Section 404. Permit approval from the Corps should be obtained for the placement of dredge or fill material in Waters of the U.S., if any, within the interior of the project site, pursuant to Section 404 of the federal Clean Water Act.</li> <li>Regional Walter Quality Control Board (RWQCB): Section 401 Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above.</li> <li>California Department of Fish and Wildlife (CDFW): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires</li> </ul></li></ul>	<ul> <li>substantially conforms to this Mitigation Measure:</li> <li>Hydrology (National Pollutant Discharge Elimination System General Permit): Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Proposed Project. The Applicant shall 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 shall be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices 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.</li> </ul>	

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>conditions that degrade the physical integrity or ecological function of any downstream receiving waters.</li> <li>Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel.</li> <li>Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.</li> <li>Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.</li> <li>If a proposed project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out.</li> </ul>	
Hydrology and Water Quality Deplete Groundwater Supply or Interfere with Groundwater Recharge	Project-Level Mitigation Measure <b>MM-HYD-2(b):</b> Consistent with the provisions of the Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with applicable laws, regulations, and health and safety standards set forth by federal, state, regional, and local authorities that regulate groundwater management, consistent with the provisions of the Groundwater Management Act and implementing regulations, including recharge in a manner that conforms with federal, state, regional, and local standards for sustainable management of	The Proposed Project would substantially conform to this Mitigation Measure. As discussed below in Section 6.10 (Hydrology and Water Quality), the Proposed Project would not result in significant impacts with implementation of the below-listed regulatory compliance measure(s), which are capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. Although no mitigation is required, compliance with the below-listed regulatory compliance

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	<ul> <li>groundwater basins, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.</li> <li>Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation.</li> <li>Avoid construction and siting on groundwater recharge areas to impervious surface.</li> <li>Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.</li> </ul>	<ul> <li>measures substantially conforms to this Mitigation Measure:</li> <li>Hydrology (Low Impact Development Plan): Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Practices Handbook.</li> <li>Hydrology (Best Management Practices): The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event, whichever is greater, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.</li> </ul>
Hydrology and Water Quality Structures within a 100- Year Floodplain Hazard Area, Risk due to Levee or Dam Failure, Risks due to Seiche,	Project-Level Mitigation Measure MM-HYD-8(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows in a 100-year flood hazard area that are within the jurisdiction and authority of the Flood Control District, County Public Works Departments, local agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the	This Mitigation Measure is not applicable to the Proposed Project as the Project Site is not, according to the Federal Emergency Management Agency (FEMA) flood insurance rate map, located within a designated flood zone.

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
Tsunami or	(Implemented by Lead Agency)	
Mudflow	and should consider mitigation measures to ensure compliance with all federal, state, and local floodplain regulations, consistent with the provisions of the National Flood Insurance Program, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:	
	<ul> <li>Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program.</li> <li>Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.</li> </ul>	
Land Use and Planning Conflict with Applicable Land Use Plan, Policy, or Regulation	Project-Level Mitigation Measure <b>MM-LU-1(b)</b> : Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with zoning and ordinance codes, general plans, land use plan, policy, or regulation of an agency with jurisdiction over the project, as applicable and feasible. Such measures may include the following, and/or other comparable measures identified by the Lead Agency:	The Proposed Project would substantially conform to this Mitigation Measure. Considering the social and economic benefits of allowing affordable housing at the Project Site, the Proposed Project seeks the appropriate General Amendment, Specific Plan Amendment and Zone Change. With the zone change and the requested entitlements, the Proposed Project conforms to the zoning and land use designations that have jurisdiction over the Project Site, and the Proposed Project would result no significant impacts. Therefore, no mitigation is required.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	• Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan.	
Land Use and Planning Physically Divide a Community	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-LU-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid the creation of barriers that physically divide such communities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Consider alignments within or adjacent to existing public rights-of-way.</li> <li>Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.</li> <li>Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).</li> <li>Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods.</li> <li>Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:</li> </ul>	This Mitigation Measure is not applicable as the Proposed Project does not physically divide an established community. The Proposed Project would replace three existing commercial buildings, three single- family residential buildings, and a surface parking lot, and will provide all required street dedications and improvements. Although the Proposed Project will replace an existing underutilized telecommunications utility yard, and would permit residential land uses within a M1 zone, the proposed permanent supportive housing uses are compatible with the surrounding multi- family residential land uses located on Juanita Avenue and Madison Avenue immediately adjacent to the Project Site. Moreover, residential land uses already exist on the Project Site. Thus the Proposed Project would not introduce a land use that does not already exist on site.

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>Reduction of the proposed right-of-way take to minimize the overall area of impact.</li> <li>Provisions for bicycle, pedestrian, and vehicle access across improved roadways.</li> <li>Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project.</li> <li>Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities.</li> </ul>	
<u>Mineral</u> <u>Resources</u> Loss of Availability of a Known Mineral Resource	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-MIN-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan that are within the jurisdiction and responsibility of the California Department of Conservation, and/or Lead Agencies.</li> <li>Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with SMARA, California Department of Conservation regulations, local general plans, specific plans, and other laws and regulation governing mineral or aggregate resources, as applicable and feasible. Such measures may include the following, other comparable measures identified by the Lead Agency:</li> <li>Provide for the efficient use of known aggregate and mineral resources or locally important mineral resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.</li> </ul>	This Mitigation Measure is not applicable to the Proposed Project. The Project Site is not located within a Mineral Resources Zone 2 (MRZ-2). The Project Site is not located within the boundaries of the State-Designated LA City Oil Field, and there is no evidence to suggest that the Project Site has been historically used for the extraction of oil. The Project Site is currently developed with three commercial buildings, three single-family residential buildings, and a paved surface parking lot. Development of the Project Site would not block or hinder access or availability of mineral resources. Therefore, the development of the Proposed Project would not result in the loss of availability of a known mineral resource.

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

	Project – Level Mitigation Measures	
Impact	(Implemented by Lead Agency)	Applicability to the Project
	have been identified in county and city general	
	plans, or other comparable measures:	
	• Recycle and reuse building materials	
	resulting from demolition. particularly	
	aggregate resources, to the maximum extent	
	practicable.	
	$\circ$ Identify and use building materials,	
	particularly aggregate materials, resulting	
	from demolition at other construction sites in	
	the SCAG region, or within a reasonable	
	hauling distance of the project site.	
	<ul> <li>Design transportation network improvements</li> </ul>	
	in a manner (such as buffer zones or the use	
	of screening) that does not preclude adjacent	
	or hearby extraction of known mineral and	
	aggregate resources following completion of	
	anorations	
	$\sim \Delta v_{oid}$ or reduce impacts on known	
	aggregate and mineral resources and	
	mineral resource recovery sites through the	
	evaluation and selection of project sites and	
	design features (e.g., buffers) that minimize	
	impacts on land suitable for aggregate and	
	mineral resource extraction by maintaining	
	portions of MRZ-2 areas in open space or	
	other general plan land use categories and	
	zoning that allow for mining of mineral	
	resources.	
Noiso	Project Lovel Mitigation Measure	
Exposure of	<b>MM-NOISE-1(b)</b> : Consistent with the provisions of	The Proposed Project would
Persons to	Section 15091 of the State CEOA Guidelines SCAG	substantially conform to this
Noise in	has identified mitigation measures capable of	Mitigation Measure As discussed in
Excess of Local	avoiding or reducing the significant effects of noise	Section 6.13 (Noise), the Proposed
Standards,	impacts that are in the jurisdiction and responsibility	Project could result in potentially
Excessive	of public agencies and/or Lead Agencies. Where the	significant noise impacts related to
Groundborne	Lead Agency has identified that a project has the	construction. The Proposed Project is
Vibration or	potential for significant effects, the Lead Agency can	subject to the following regulatory
Noise Levels,	and should consider mitigation measures to ensure	compliance measures that avoid or
Substantial	consistency with the Federal Noise Control Act,	reduce the significant effects of noise
Permanent	California Government Code Section 65302, the	impacts that are in the jurisdiction and
Increase in	Governor's Office of Planning and Research (OPR)	responsibility of public agencies and/or
Noise Level,	Noise Element Guidelines, and the noise ordinances	Lead Agencies:
Substantial	and general plan noise elements for the counties or	The Design take the second of the fi
l emporary	Lines where projects are undertaken, Federal	Ine Project shall comply with the
Noise Lovale	documents and other health and cafety standards act	Ordinance No. 144.221 and
INDISE LEVEIS	forth by federal, state, and local authorities that	161,574, and any subsequent

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)		Applicability to the Project
	<ul> <li>fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.</li> <li>Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic</li> </ul>	N-3	to avoid operating several pieces of equipment simultaneously, which cause high noise levels. Construction equipment shall not idle when not in use. The contractor shall place noise construction equipment as far from the Project Site edges as practicable.
	tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures	N-3	power construction equipment with noise shielding and muffling devices. The noise mufflers shall be consistent with manufacturers' standards and be equipped with all construction equipment, fixed or mobile.
	<ul> <li>are available and consistent with construction procedures.</li> <li>Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors.</li> <li>Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors.</li> <li>Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive</li> </ul>	N-4	The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site fronting residential land uses. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier shall include <sup>3</sup> / <sub>4</sub> inch plywood or other sound absorbing material capable of achieving a 14 dBA reduction in
	<ul> <li>receptors to the maximum extent feasible.</li> <li>Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-ofway.</li> <li>Use noise barriers to protect sensitive receptors from excessive noise levels during construction.</li> <li>Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls.</li> <li>Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptors.</li> <li>Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound</li> </ul>	N-5	sound level. An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>barriers do not provide sufficient noise reduction.</li> <li>Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.</li> </ul>	
Noise Exposure of Persons to Excessive Groundborne Vibration or Noise Levels	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-NOISE-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of vibration impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Federal Transportation Authority and Caltrans guidance documents, county or city transportation commission, noise and vibration ordinances and general plan noise elements for the counties and cities where projects are undertaken and other health and safety regulations set forth by federal state, and local authorities that regulate vibration levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</li> <li>For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.</li> <li>For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.</li> <li>For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required</li> </ul>	This Mitigation Measure is not applicable to the Proposed Project because no significant impacts related to groundborne vibration will occur. Therefore, no mitigation is required.

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	<ul> <li>to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.</li> <li>For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the use of more than one pile driver to shorten the total pile driving duration.</li> </ul>	
Population and Housing Displacement of Housing, Replacement Housing Elsewhere	<ul> <li>Project-Level Implementation Measures</li> <li>MM-PHE-2(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to displacement that are within the jurisdiction and responsibility of Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to minimize the displacement of existing housing and people and to ensure compliance with local jurisdiction's housing elements of their general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.</li> <li>Prioritize the use existing ROWs, wherever feasible.</li> <li>Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.</li> </ul>	This Mitigation Measure is not applicable to the Proposed Project. The Proposed Project would consist of the development of new housing on a site that is currently occupied by three commercial buildings, three single- family residential buildings, and a paved surface parking lot. The tenants within the three existing residences have been notified of the Proposed Project and have been offered relocation assistance in accordance with City of Los Angeles Policies. The Proposed Project would provide 454 permanent supportive housing units and is consistent with the City's Housing Element of the General Plan to provide much needed housing and support services for the homeless population. As such, no further mitigation is warranted.
Public Services Adverse Impacts Associated with New or Physically Altered Governmental	Project-Level Mitigation Measure MM-PS-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response	This Mitigation Measure is not applicable to the Proposed Project. As discussed in Section 6.15 (Public Services), existing facilities are capable of providing acceptable response times for fire protection and emergency response services. Specifically, the

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

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Impact	Project – Level Mitigation Measures	Applicability to the Project
Facilities for Public Protective Fire and Emergency Services	<ul> <li>(Implemented by Lead Agency)</li> <li>services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the performance objectives established in the adopted county and city general plans and the performance objectives established in the adopted county and city general plans, to provide sufficient structures and buildings to accommodate fire and emergency response, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:</li> <li>Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements.</li> <li>During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-GEO-1(b), MM-BIO-3(b), MM-HID-1(b), MM-GEO-1(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-UL-2(b), MM-CUL-3(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or e</li></ul>	<ul> <li>Los Angeles Fire Department considers fire protection services for a project adequate if a project is within the maximum response distance (1.5 miles in this instance). The Project Site is served by LAFD Station No. 6, approximately 800 feet (0.2 mile) east of the Project Site. Therefore, fire protection response with existing facilities is therefore considered adequate, and Projects impacts would not be significant.</li> <li>Additionally, the City has determined that the following regulatory compliance measures are equal to or more effective than this Mitigation Measure with respect to avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions:</li> <li>Public Services (LAFD): The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:         <ul> <li>Fire lanes, where required, shall be a minimum of 20 feet in width;</li> <li>All structures must be within 300 feet of an approved fire hydrant; and</li> <li>Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge</li> </ul> </li> </ul>

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
		<ul> <li>of the roadway of an improved street or approved fire lane.</li> <li>Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.</li> </ul>
Public Services Adverse Impacts Associated with New or Physically Altered Governmental Facilities for Public Protective Security Services	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-PS-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the standards established in the safety elements of county and city general plans to maintain police response performance objectives, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible, including:</li> <li>Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description.</li> <li>Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel.</li> </ul>	The Proposed Project would substantially conform to this Mitigation Measure. As discussed in Section 6.15 (Public Services), existing facilities are capable of providing acceptable response times for police protection. The Project Site is currently served by the City of Los Angeles Police Department's (LAPD) Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas. The Rampart Community Police Station, located at 1401 W. 6 <sup>th</sup> Street, approximately 2.4 miles southeast (driving distance) from the Project Site. Additionally, the City has determined that the following design features substantially conform with this Mitigation Measure as they avoid or reduce the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions: • (Police–Demolition/Construction Sites): Fences shall be constructed around the site to minimize

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES- 3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-CUL-3(b), MM-CUL-1(b), MM-GEO-1(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	<ul> <li>trespassing, vandalism, short-cut attractions and attractive nuisances.</li> <li>Public Services (Police): The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1<sup>st</sup> Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.</li> <li>Public Services (Police): The Applicant will provide an onsite security personnel to operate 24 hours a day, seven days a week.</li> </ul>
Adverse Impacts Associated with New or Physically Altered Governmental Facilities for School Services	<b>MM-PS-3(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the 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 that are within the jurisdiction and responsibility of school districts and local jurisdictions. Where the Lead Agency has	The Proposed Project would substantially conform to this Mitigation Measure. As discussed in Section 6.15 (Public Services), the Proposed Project will comply with the following regulatory compliance measures that substantially conform to this Mitigation Measure and avoid or reduce the significant effects from the need for new or physically altered governmental facilities the construction

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Community Facilities Act of 1982, the California Education Code, and the goals and policies established within the applicable adopted county and city general plans to ensure that the appropriate school district fees are paid in accordance with state law, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible:</li> <li>Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.</li> <li>During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AE-1(b), MM-GEO-1(b), MM-GEO-1(b), MM-GEO-1(b), MM-GEO-1(b), MM-GEO-1(b), MM-GEO-1(b), MM-GEO-1(b), MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.</li> </ul>	<ul> <li>of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives that are within the jurisdiction and responsibility of school districts and local jurisdictions:</li> <li>Public Services (Schools): The Applicant shall pay all applicable school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.</li> <li>With implementation of this regulatory compliance measure, the Proposed Project would have no significant impacts and no mitigation is required.</li> </ul>
Recreation Increased Use or Physical Deterioration of Recreational Facilities	Project-Level Mitigation Measure <b>MM-REC-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures capable of	The Proposed Project would substantially conform to this Mitigation Measure. The Proposed Project would not result in significant impacts with implementation of the below-listed regulatory compliance measures and project design features that avoid or reduce the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
Impact	<ul> <li>Project – Level Mitigation Measures (Implemented by Lead Agency)</li> <li>avoiding or reducing significant impacts on the use of existing neighborhood and regional parks or other recreational facilities to ensure compliance with county and city general plans and the Quimby Act, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</li> <li>Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.</li> <li>Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:         <ul> <li>Increasing the accessibility to natural areas for outdoor recreation.</li> <li>Promoting infill development and redevelopment to revitalize existing communities.</li> <li>Utilizing "green" development techniques.</li> <li>Promoting water-efficient land use and development.</li> </ul> </li> </ul>	<ul> <li>Applicability to the Project</li> <li>are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. Although no mitigation is required, compliance with the below-listed regulatory compliance measure substantially conforms to this Mitigation Measure:</li> <li>Recreation (Increased Demand for Parks or Recreational Facilities): Pursuant to Sections 12.33 and/or 17.12 of the Los Angeles Municipal Code, the Project Applicant shall pay the applicable Quimby fees for construction of dwelling units.</li> <li>In addition, the Proposed Project incorporates the following project design feature:</li> <li>The Proposed Project would include 36,580 square feet of open space. Recreational amenities would include ground level courtyards and community rooms. These areas provide the opportunity for Project residents and visitors space to gather.</li> </ul>
	<ul> <li>Promoting water-efficient land use and development.</li> <li>Encouraging multiple uses.</li> <li>Including trail systems and trail segments in General Plan recreation standards.</li> <li>Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the HQTA.</li> <li>Where construction or expansion of recreational facilities is included in the project or required to meet public park service ratios, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-BIO-1(b), MM-BIO-</li> </ul>	
Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	
Transportation/ Traffic Conflict with Measures of Effectiveness For Performance of the Circulation System	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-TRA-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</li> <li>Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.</li> <li>Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides.</li> <li>Provide a vanpool for employees.</li> <li>Fund capital improvement projects to</li> </ul>	<ul> <li>The Proposed Project would substantially conform to this Mitigation Measure. The Proposed Project incorporates the following design elements and regulatory compliance measures that substantially conform to this Mitigation Measure and avoid or reduce the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies:</li> <li>As an infill residential development in an urban area, the Proposed Project is expected to have a higher percentage of internal and pass-by trips. Furthermore, because of its proximity to public transit, employment, and entertainment destinations, a number of Project trips would be expected to be walk or transit trips rather than auto vehicle trips.</li> <li>The Proposed Project would include 251 on-site bicycle parking spaces, which is pursuant to the standards and requirements of the Vermont/Western Transit Oriented District Station Neighborhood Area Plan Specific Plan.</li> </ul>

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
•	(Implemented by Lead Agency)	
	<ul> <li>Provide a Transportation Demand Management (TDM) plan containing strategies to reduce onsite parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including:         <ul> <li>Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement</li> <li>Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document)</li> <li>Signage and striping onsite to encourage bike safety</li> <li>Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials</li> <li>Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan.</li> <li>Direct transit sales or subsidized transit passes</li> <li>Guaranteed ride home program</li> <li>Pre-tax commuter benefits (checks)</li> <li>On-site car-sharing program (such as City Car Share, Zip Car, etc.)</li> <li>On-site carpooling program</li> <li>Distribution of information concerning</li> </ul> </li> </ul>	<ul> <li>The Proposed Project includes the following features to improve pedestrian facilities and to provide a safe and walkable pedestrian environment, to increase the number of walking trips, and provide for on-site facilities to reduce the need to make vehicle trips off-site.         <ul> <li>Improve sidewalks adjacent to and within the Project.</li> <li>Add pedestrian amenities such as: landscaping and setbacks, shade, benches, pedestrian-scale lighting, etc, throughout the ground level courtyard</li> </ul> </li> <li>Additionally, through the City's Site Plan Review authority, the city may impose conditions of approval or mitigation measures as necessary to avoid or reduce the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies.</li> </ul>
	<ul> <li>alternative transportation options</li> <li>Parking spaces sold/leased separately</li> <li>Parking management strategies; including attendant/valet parking and shared parking spaces.</li> <li>Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas.</li> <li>Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible.</li> <li>Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives</li> </ul>	As discussed in Section 6.17 (Transportation/Traffic) and the Enlightenment Plaza Project VMT Analysis (contained in Appendix I-2 to this SCEA), the Proposed Project would not result in any significant VMT or traffic related impacts. Furthermore, through the conditions of approval associated with VTT 82798, the Proposed Project has been conditioned to implement specific construction traffic control measures to minimize and /or avoid traffic impacts during condtruction. Such measures include, but are not limited to, identifying permissible hours of hauling activities to avoid the peak commute hours, instituting a prohibition on staging any haul trucks on Madison Aveue or

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
impact	(Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>(Implemented by Lead Agency)         <ul> <li>and providing public education and publicity about public transportation services.</li> </ul> </li> <li>Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work.</li> <li>Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs.</li> <li>Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles.</li> <li>Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions.</li> <li>Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles.</li> <li>Purchase, or create incentives for purchasing, low or zero-emission vehicles.</li> <li>Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.</li> <li>Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.</li> <li>Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives.</li> </ul>	Applicability to the Project Juanita Avenue, providing a flag person to assist with ingress/egress truck traffic, and prohibiting any use of Juanita Abvenue for hauling activities. These conditions would be enforced through the permit approval process and require the Applicant to record and execute a Covenant and Agreement binding the subdivider to follow the haul route conditions as specified in the approval letter. Therefore, no mitigation is required.
	<ul> <li>or zero-emission vehicles.</li> <li>Create local "light vehicle" networks, such as neighborhood electric vehicle systems.</li> <li>Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.</li> <li>Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.</li> <li>Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit eventor.</li> </ul>	
	<ul> <li>improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives.</li> <li>Project Selection:         <ul> <li>Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining</li> </ul> </li> </ul>	

Impact	Project – Level Mitigation Measures	Applicability to the Project
	economic vitality and sustainability	
	<ul> <li>Separate sidewalks whenever possible on</li> </ul>	
	both sides of all new street improvement	
	projects except where there are severe	
	topographic or natural resource constraints	
	Public Involvement:	
	<ul> <li>Carry out a comprehensive public</li> </ul>	
	involvement and input process that	
	provides information about transportation	
	issues, projects, and processes to	
	community members and other stakeholders,	
	especially to those traditionally underserved	
	by transportation services.	
	<ul> <li>Transit and Multimodal Impact Fees:</li> </ul>	
	<ul> <li>Assess transit and multimodal impact fees</li> </ul>	
	for new developments to fund public	
	transportation infrastructure, bicycle	
	infrastructure, pedestrian infrastructure and	
	other multimodal accommodations.	
	<ul> <li>Implement traffic and roadway management</li> <li>strategies to improve mobility and efficiency</li> </ul>	
	strategies to improve mobility and eniciency,	
	System Monitoring:	
	<ul> <li>Monitor traffic and congestion to determine</li> </ul>	
	when and where new transportation facilities	
	are needed in order to increase access and	
	efficiency.	
	Arterial Traffic Management:	
	$\circ$ Modify arterial roadways to allow more	
	efficient bus operation, including bus lanes	
	and signal priority/preemption where	
	necessary.	
	Signal Synchronization:	
	<ul> <li>Expand signal timing programs where emissions reduction benefits can be</li> </ul>	
	demonstrated including maintenance of the	
	synchronization system and will coordinate	
	with adjoining jurisdictions as needed to	
	optimize transit operation while maintaining a	
	free flow of traffic.	
	HOV Lanes:	
	<ul> <li>Encourage the construction of high-</li> </ul>	
	occupancy vehicle (HOV) lanes or similar	
	mechanisms whenever necessary to relieve	
	congestion and reduce emissions.	
	Delivery Schedules:	
	<ul> <li>Establish ordinances or land use permit</li> </ul>	
	conditions influing the hours when deliveries	

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	(Implemented by Lead Agency)	, , , , , , , , , , , , , , , , , , ,
	<ul> <li>areas.</li> <li>Implement and supporting trip reduction programs.</li> </ul>	
	transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives.	
	<ul> <li>Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities.</li> </ul>	
	<ul> <li>Bicycle and Pedestrian Trails:         <ul> <li>Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations.</li> </ul> </li> </ul>	
	<ul> <li>Bicycle Safety Program:         <ul> <li>Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers.</li> </ul> </li> </ul>	
	<ul> <li>Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects.</li> </ul>	
	<ul> <li>Bicycle Parking:         <ul> <li>Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists).</li> </ul> </li> </ul>	
	<ul> <li>Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following:         <ul> <li>Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation;</li> <li>Eliminate or reduce minimum parking</li> </ul> </li> </ul>	
	<ul> <li>"Unbundle" parking (require that parking is paid for separately and is not included in the</li> </ul>	

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	(Implemented by Lead Agency)	
	base rent for residential and commercial	
	space);	
	<ul> <li>Use parking pricing to discourage private</li> </ul>	
	vehicle use, especially at peak times;	
	<ul> <li>Create parking benefit districts, which invest</li> </ul>	
	meter revenues in pedestrian infrastructure	
	and other public amenities;	
	<ul> <li>Establish performance pricing of street</li> </ul>	
	parking, so that it is expensive enough to	
	promote frequent turnover and keep 15	
	percent of spaces empty at all times;	
	<ul> <li>Encourage shared parking programs in</li> </ul>	
	mixed-use and transit-oriented development	
	areas.	
	Establish policies and programs to reduce onsite	
	parking demand and promote ride-sharing and	
	public transit at large events, including:	
	• Promote the use of peripheral parking by	
	increasing on-site parking rates and offering	
	reduced rates for peripheral parking;	
	<ul> <li>Encourage special event center operators to</li> </ul>	
	advertise and offer discounted transit passes	
	with event tickets;	
	<ul> <li>Encourage special event center operators to</li> </ul>	
	advertise and offer discount parking	
	incentives to carpooling patrons, with four or	
	more persons per vehicle for on-site parking	
	<ul> <li>Promote the use of bicycles by providing</li> </ul>	
	space for the operation of valet bicycle	
	parking service.	
	<ul> <li>Parking "Cash-out" Program:</li> </ul>	
	<ul> <li>Require new office developments with more</li> </ul>	
	than 50 employees to offer a Parking "Cash-	
	out" Program to discourage private vehicle	
	use.	
	<ul> <li>Pedestrian and Bicycle Promotion:</li> </ul>	
	$\circ$ Work with local community groups and	
	downtown business associations to	
	organize and publicize walking tours and	
	bicycle events, and to encourage pedestrian	
	and bicycle modes of transportation.	
	Fleet Replacement:	
	<ul> <li>Establish a replacement policy and schedule</li> </ul>	
	to replace fleet vehicles and equipment with	
	the most fuel efficient vehicles practical,	
	including gasoline hybrid and alternative fuel	
	or electric models.	

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
<b>T</b> ( (* /	(Implemented by Lead Agency)	
Impact <u>Transportation/</u> <u>Traffic</u> Conflict with Applicable Congestion Management Program	<ul> <li>Project – Level Mitigation Measures (Implemented by Lead Agency)</li> <li>Project-Level Mitigation Measure</li> <li>MM-TRA-2(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions:</li> <li>Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation:</li> <li>Advocate for a regional, market-based system to price or charge for auto trips during peak hours.</li> <li>Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.</li> <li>Coordinate controlled intersections so that traffic passes more efficiently through</li> </ul>	Applicability to the Project           Applicability to the Project           Work           Substantially           conform to this           Mitigation           Measure.           The Proposed           Project           incorporates           the following           design elements           that substantially           conform to this Mitigation Measure and           avoid or reduce           avoid or reduce           the potential for           conflicts with an applicable congestion           management program that are within           the jurisdictions of the lead agencies,           including, but not limited to, VMT, VHD           and travel demand measures, or other           standards established by the county           congestion management agency for           designated roads or highways:           •           As a residential development in           an urban area, the Proposed           Project is expected to have a           higher percentage of internal           and pass-by trips. Furthermore,           because of its proximity to           public transit, employment and           entertainment destinations, a
	<ul> <li>the project design that promote the use of alternative modes of transportation.</li> <li>Coordinate controlled intersections so that traffic passes more efficiently through</li> </ul>	<ul> <li>Specific Plan.</li> <li>The Proposed Project includes the following features to improve pedestrian facilities and to provide a</li> </ul>
	<ul> <li>congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology.</li> <li>Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share</li> </ul>	safe and walkable pedestrian environment, to increase the number of walking trips, and provide for on-site facilities to reduce the need to make vehicle trips off-site. o Improve sidewalks adjacent to
	vehicles at convenient locations accessible	and within the Project.

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>by public transportation.</li> <li>Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation investments targeted to reduce heavy-duty truck delay.</li> <li>Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency:</li> <li>A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes.</li> <li>Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur.</li> <li>Location of construction staging areas for materials, equipment, and vehicles at an approved location.</li> <li>A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit.</li> <li>Provision for accommodation of pedestrian flow.</li> <li>As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces.</li> </ul>	<ul> <li>Add pedestrian amenities such as: landscaping and setbacks, shade, benches, pedestrian- scale lighting, etc., throughout ground floor courtyards.</li> <li>Additionally, as summarized in Section 6.17 (Transportation/Traffic), the VMT Analysis for the Proposed Project concluded that the Project would result in less than significant traffic impacts with respect to regional VMT as the Project would generate less than 6.0 VMT per capita for households and 0.0 VMT per employees for work-related VMTs. Further, as discussed in Appendix I-1 Transportation Study, the Proposed Project would result in less than significant impacts with respect to City policies, plans and programs related to pedestrian safety, bicycle programs, and transit services. As such, no mitigation is warranted.</li> </ul>

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Impact	Project – Level Mitigation Measures	Applicability to the Project
•	(Implemented by Lead Agency)	
	• Any damage to the street caused by heavy	
	equipment, or as a result of this	
	construction, shall be repaired, at the project	
	sponsor's expense., within one week of the	
	occurrence of the damage (or excessive	
	wear), unless further damage/excessive	
	wear may continue; in such case, r Repair	
	shall occur prior to issuance of a final	
	inspection of the building permit. All damage	
	that is a threat to public health or safety shall	
	be repaired immediately. The street shall be	
	restored to its condition prior to the new	
	construction as established by the Lead	
	Agency (or other appropriate government	
	agency) and/or photo documentation, at the	
	sponsor's expense, before the issuance of a	
	Certificate of Occupancy.	
	$\circ$ Any heavy equipment brought to the	
	construction site shall be transported by	
	truck, where feasible.	
	<ul> <li>No materials or equipment shall be stored on</li> </ul>	
	the traveled roadway at any time.	
	• Prior to construction, a portable toilet facility	
	and a debris box shall be installed on the site,	
	and properly maintained through project	
	completion.	
	<ul> <li>All equipment shall be equipped with mufflers</li> </ul>	
	$\circ$ Prior to the end of each work-day during	
	construction the contractor or contractors	
	shall pick up and properly dispose of all litter	
	resulting from or related to the project	
	whether located on the property within the	
	nublic rights-of-way, or properties of adjacent	
	or nearby neighbors	
	<ul> <li>Promote "least polluting" ways to connect</li> </ul>	
	people and goods to their destinations.	
	Create an interconnected transportation system	
	that allows a shift in travel from private	
	passenger vehicles to alternative modes.	
	including public transit, ride sharing, car sharing,	
	bicycling and walking, by incorporating the	
	following, if determined feasible and applicable by	
	the Lead Agency:	
	<ul> <li>Ensure transportation centers are multi-</li> </ul>	
	modal to allow transportation modes to	
	intersect.	
	<ul> <li>Provide adequate and affordable public</li> </ul>	
	transportation choices, including expanded	

Impact	Project – Level Mitigation Measures	Applicability to the Project
	(Implemented by Lead Agency)	P
	bus routes and service, as well as other transit choices such as shuttles, light rail, and rail.	
	<ul> <li>To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such</li> </ul>	
	<ul> <li>as colleges.</li> <li>Focus transit resources on high-volume corridors and high-boarding destinations such as colleges employment centers and</li> </ul>	
	<ul> <li>regional destinations.</li> <li>Coordinate schedules and routes across service lines with neighboring transit</li> </ul>	
	<ul> <li>authorities.</li> <li>Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles)</li> </ul>	
	<ul> <li>Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including</li> </ul>	
	<ul> <li>options such as removing service from less dense, underutilized areas to do so.</li> <li>o Employ transit-preferential measures, such</li> </ul>	
	as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit proforantial measures or improve	
	access to transit. The use of access management shall be considered where needed to reduce conflicts between transit	
	<ul> <li>Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets</li> </ul>	
	<ul> <li>Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible.</li> </ul>	
	<ul> <li>Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including:</li> </ul>	
	<ul> <li>Ensure transit stops and bus lanes are safe, convenient, clean and efficient.</li> <li>Ensure transit stops have clearly marked</li> </ul>	
	<ul> <li>street-level designation, and are accessible.</li> <li>Ensure transit stops are safe, sheltered, benches are clean and lighting is adequate</li> </ul>	

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	<ul> <li>Place transit stations along transit corridors</li> </ul>	
	within mixed-use or transit-oriented	
	development areas at intervals of three to	
	four blocks, or no less than one-half mile.	
	<ul> <li>Enhance customer service and system ease-of-</li> </ul>	
	use, if determined feasible and applicable by the	
	Lead Agency, including:	
	<ul> <li>Develop a Regional Pass system to reduce</li> </ul>	
	the number of different passes and tickets	
	required of system users.	
	<ul> <li>Implement "Smart Bus" technology, using</li> </ul>	
	GPS and electronic displays at transit stops	
	to provide customers with "real-time" arrival	
	and departure time information (and to allow	
	the system operator to respond more quickly	
	and effectively to disruptions in service).	
	<ul> <li>Investigate the feasibility of an on-line trip-</li> </ul>	
	planning program.	
	<ul> <li>Prioritize transportation funding to support a shift from private passanger vahiales to transit and</li> </ul>	
	other modes of transportation if determined	
	feasible and applicable by the Lead Agency	
	including:	
	<ul> <li>Give funding preference to improvements in</li> </ul>	
	public transit over other new infrastructure for	
	private automobile traffic.	
	• Before funding transportation improvements	
	that increase roadway capacity and VMT,	
	evaluate the feasibility and effectiveness of	
	funding projects that support alternative	
	modes of transportation and reduce VMT,	
	including transit, and bicycle and pedestrian	
	access.	
	• Promote ride sharing programs, if determined	
	feasible and applicable by the Lead Agency,	
	Including:	
	o Designate a certain percentage of parking	
	<ul> <li>Designate adequate passenger loading</li> </ul>	
	unloading and waiting areas for ride-sharing	
	vehicles	
	<ul> <li>Provide a web site or message board for</li> </ul>	
	coordinating shared rides.	
	<ul> <li>Encourage private, for-profit community car-</li> </ul>	
	sharing, including parking spaces for car	
	share vehicles at convenient locations	
	accessible by public transit.	
	• Hire or designate a rideshare coordinator to	
	develop and implement ridesharing	

Table 5.1		
Applicability of Project-Level Mitigation Measures from the		
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy		

Impact	Project – Level Mitigation Measures	Applicability to the Project
impact	(Implemented by Lead Agency)	Applicability to the Project
	programs.	
	• Support voluntary, employer-based trip reduction	
	programs, if determined feasible and applicable	
	by the Lead Agency, including:	
	<ul> <li>Provide assistance to regional and local</li> </ul>	
	ndesharing organizations.	
	expand incentives for employer ridesbaring	
	programs	
	<ul> <li>Require the development of Transportation</li> </ul>	
	Management Associations for large	
	employers and commercial/ industrial	
	complexes.	
	• Provide public recognition of effective	
	programs through awards, top ten lists, and other mechanisms.	
	• Implement a "guaranteed ride home" program	
	for those who commute by public transit, ride-	
	sharing, or other modes of transportation, and	
	the program	
	<ul> <li>Encourage and utilize shuttles to serve</li> </ul>	
	neighborhoods employment centers and major	
	destinations.	
	• Create a free or low-cost local area shuttle	
	system that includes a fixed route to popular	
	tourist destinations or shopping and business	
	centers.	
	<ul> <li>Work with existing shuttle service providers to coordinate their services.</li> </ul>	
	Facilitate employment opportunities that minimize	
	the need for private vehicle trips, including:	
	<ul> <li>Amend zoning ordinances and the Development Code to include live work sites</li> </ul>	
	and satellite work centers in appropriate	
	locations.	
	• Encourage telecommuting options with new	
	and existing employers, through project	
	review and incentives, as appropriate.	
	• Enforce state idling laws for commercial vehicles,	
	including delivery and construction vehicles.	
	Organize events and workshops to promote	
	Implement a Parking Management Program to	
	discourage private vehicle use including.	
	• Encouraging carpools and vanpools with	
	preferential parking and a reduced parking	
	fee.	
	<ul> <li>Institute a parking cash-out program.</li> </ul>	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul> <li>Renegotiate employee contracts, where possible, to eliminate parking subsidies.</li> <li>Install on-street parking meters with fee structures designed to discourage private vehicle use.</li> <li>Establish a parking fee for all single-occupant vehicles.</li> <li>Work with school districts to improve pedestrian and bicycle to schools and restore school bus service</li> <li>Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities.</li> <li>Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency.</li> <li>Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers.</li> <li>Synchronize traffic signals to reduce congestion and air quality.</li> <li>Work with community groups and business associations to organize and publicize walking tours and bicycle evens.</li> <li>Support legislative efforts to increase funding for local street repair.</li> </ul>	
Transportation/ Traffic Inadequate Emergency Access <u>Hazards and</u> <u>Hazardous</u> <u>Materials</u> Impair or Interfere with Emergency Response or Evacuation Plan	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-TRA-5(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider improving emergency access and ensuring compliance with the provisions of the county and city general plan, Emergency Evacuation Plan, and other regional and local plans establishing access during emergencies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</li> <li>Prior to construction, project implementation</li> </ul>	The Proposed Project would substantially conform to this Mitigation Measure As discussed in Section 6.17, (Transportation/Traffic), the Proposed Project Transportation Analysis included an assessment of the Project's potential impacts to emergency access and emergency evacuation plans. As concluded in the Transportation Impact Study (see Appendix I-1), the Proposed Project would not interfere with any emergency access plans and no further analysis or mitigation is warranted.

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
	(Implemented by Lead Agency)	· · · · · · · · · · · · · · · · · · ·
	agencies can and should ensure that all	
	necessary local and state road and railroad	
	encroachment permits are obtained. The project	
	implementation agency can and should also	
	comply with all applicable conditions of	
	approval. As deemed necessary by the	
	governing jurisdiction, the road encroachment	
	permits may require the contractor to prepare a	
	traffic control plan in accordance with	
	professional engineering standards prior to	
	construction. Traffic control plans can and should	
	include the following requirements:	
	<ul> <li>Identification of all roadway locations where</li> </ul>	
	special construction techniques (e.g.,	
	directional drilling or night construction)	
	would be used to minimize impacts to traffic	
	flow.	
	<ul> <li>Development of circulation and detour plans</li> </ul>	
	to minimize impacts to local street	
	circulation. This may include the use of	
	signing and flagging to guide vehicles	
	through and/or around the construction zone.	
	<ul> <li>Scheduling of truck trips outside of peak</li> </ul>	
	morning and evening commute hours.	
	<ul> <li>Limiting of lane closures during peak hours to</li> </ul>	
	the extent possible.	
	<ul> <li>Usage of haul routes minimizing truck traffic</li> </ul>	
	on local roadways to the extent possible.	
	<ul> <li>Inclusion of detours for bicycles and</li> </ul>	
	pedestrians in all areas potentially affected by	
	project construction.	
	<ul> <li>Installation of traffic control devices as</li> </ul>	
	specified in the California Department of	
	Construction and Maintenance Work Zones.	
	<ul> <li>Development and implementation of access</li> </ul>	
	plans for highly sensitive land uses such as	
	police and life stations, transit stations,	
	nospitals, and schools. The access plans	
	would be developed with the lacinty owner	
	emergency vehicle access offected	
	iurisdictions can and should be asked to	
	identify detours for emergency vehicles	
	which will then be posted by the contractor	
	Notify in advance the facility owner or	
	operator of the timing location and duration	
	of construction activities and the locations of	
	detours and lane closures.	

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures	Applicability to the Project
Impact	<ul> <li>Project – Level Mitigation Measures (Implemented by Lead Agency)</li> <li>Storage of construction materials only in designated areas.</li> <li>Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.</li> <li>Enhance emergency preparedness awareness</li> </ul>	Applicability to the Project
	<ul> <li>among public agencies and with the public at large.</li> <li>Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: <ul> <li>Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities.</li> <li>Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format.</li> <li>Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function.</li> </ul> </li> </ul>	
<u>Utilities and</u> <u>Service</u> <u>Systems</u> Require New Water or Wastewater Treatment Facilities	Project-Level Mitigation Measure MM-USS-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on utilities and service systems, particularly for construction of storm water drainage facilities including new transportation and land use projects that are within the responsibility of local jurisdictions including the Riverside, San Bernardino, Los Angeles, Ventura, and Orange Counties Flood Control District, and County of Imperial. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures, as applicable and feasible. These mitigation measures are within the responsibility of the Lead Agencies and Regional Water Quality Control Boards of (Regions 4, 6, 8,	<ul> <li>The Proposed Project would substantially conform to this Mitigation Measure. The Proposed Project is subject to the following regulatory compliance measures that substantially conform to this Mitigation Measure and avoid or reduce the significant effects on utilities and service systems:</li> <li>Utilities (Low Impact Development Plan): Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for</li> </ul>

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

	Project – Level Mitigation Measures	
Impact	(Implemented by Lead Agency)	Applicability to the Project
Impact	(Implemented by Lead Agency) and 9) pursuant to the provisions of the National Flood Insurance Act, stormwater permitting requirements for stormwater discharges for new constructions, the flood control act, and Urban Waste Management Plan. Such mitigation measures, or other comparable measures, capable of avoiding or reducing significant impacts on the use of existing storm water drainage facilities and can and should be adopted where Lead Agencies identify significant impacts on new storm water drainage facilities.	<ul> <li>Applicability to the Project</li> <li>review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.</li> <li>Utilities (Water): As part of the normal construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase.</li> <li>Utilities (Water): The project shall 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).</li> <li>Utilities (Water): The Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development in order to exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code in accordance with the California Building Energy Efficiency Standards by 20%. It must also provide irrigation design and controllers that are weather- or soil moisture-based and</li> </ul>
		automatically adjust in response to

Table 5.1
Applicability of Project-Level Mitigation Measures from the
2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
		weather conditions and plants' needs.
Utilities and Service Systems Require New or Expanded Entitlements for Water Supply	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-USS-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with EO B-29-15, provisions of the Porter –Cologne Water Quality Control Act, California Domestic Water Supply Permit requirements, and applicable County, City or other Local provisions. Such measures may include the following or other comparable measures identified by the Lead Agency:</li> <li>Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.</li> <li>Promote the availability of drought-resistant landscaping and hillside landscaping can and should be implemented where feasible.</li> <li>Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.</li> <li>Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of</li> </ul>	<ul> <li>needs.</li> <li>The Proposed Project would substantially conform to this Mitigation Measure. The Proposed Project is subject to the following regulatory compliance measures that substantially conform to this Mitigation Measure and avoid or reduce the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies:</li> <li>As part of the normal construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase.</li> <li>The project shall 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).</li> <li>The Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable</li> </ul>
	codes and standard practices including the	development in order to exceed

Impact	Project – Level Mitigation Measures	Applicability to the Project		
impaor	(Implemented by Lead Agency)			
	<ul> <li>Uniform Building Code.</li> <li>Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.</li> <li>Avoid designs that require continual dewatering where feasible. Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.</li> </ul>	the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code in accordance with the California Building Energy Efficiency Standards by 20%. It must also provide irrigation design and controllers that are weather- or soil moisture- based and automatically adjust in response to weather conditions and plants' needs.		
Utilities and Service Systems Landfill with Sufficient Capacity	<ul> <li>Project-Level Mitigation Measure</li> <li>MM-USS-6(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project that has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance pursuant to the provisions of the Solid Waste Diversion Goals and Integrated Waste Management Plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</li> <li>Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following:         <ul> <li>Reuse and minimization of construction and demolition (C&amp;D) debris and diversion of C&amp;D waste from landfills to recycling facilities.</li> <li>Inclusion of a waste management plan that promotes maximum C&amp;D diversion.</li> <li>Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning. (3) increased recycled content. (4)</li> </ul> </li> </ul>	<ul> <li>The Proposed Project would substantially conform to this Mitigation Measure. The Proposed Project is subject to the following regulatory compliance measure that substantially conforms to this Mitigation Measure and avoids or reduces the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies:</li> <li>Utilities (Solid Waste Recycling)         <ul> <li>(Operational) All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.</li> <li>(Operational) Recycling bins shall be provided at appropriate locations to promote recycling of propertional part of the state of the taken to an appropriate landfill.</li> </ul> </li></ul>		

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

	Droject Level Mitigation Massures					
Impact	(Implemented by Load Agency)	Applicability to the Project				
-	(Implemented by Lead Agency)	neger metal sizes and athen				
	use of reclaimed materials, and (5) use of	paper, metal, glass, and other				
	structural materials in a dual fole as infisit	aball be emptied and recycladed				
	material (e.g., stained concrete liooning,	shall be emplied and recycled				
	Unimistred cellings, etc.).	accordingly as a part of the				
	• Reuse of existing structure and shell in	Project s regular solid waste				
	Prenovation projects.	disposal program.				
	• Design for deconstruction without	<ul> <li>(Construction/Demolition) Prior to</li> <li>the issuence of any demolition or</li> </ul>				
	compromising salety.	the issuance of any demolition of				
	Design for nextbally infough the use of	construction permit, the Applicant				
	furniture meyophic took lighting and other	shall provide a copy of the receipt				
	rougeble building components	or contract from a waste disposal				
	Peusable building components.	company providing services to the				
	<ul> <li>Development of indoor recycling program and oppop</li> </ul>	project, specifying recycled waste				
	Space.	Service(S), to the Satisfaction of the				
	<ul> <li>Discourage the siting of new landing unless</li> <li>all other waste reduction and prevention</li> </ul>	The demolition and construction				
	all other waste reduction and prevention	contractor(s) shall only contract for				
	actions have been fully explored. If failulin	wests disposal convises with a				
	with an adoquate landfill owned	company that recyclos domolition				
	undoveloped land buffer to minimize the	and/or construction related waster				
	notential adverse impacts of the landfill in	<ul> <li>Construction/Demolition)</li> </ul>				
	potential adverse impacts of the landing in	facilitate on-site separation and				
	<ul> <li>Locally generated waste should be disposed.</li> </ul>	recycling of demolition and				
	of regionally considering distance to disposed	construct55ion-related wastes the				
	site Encourage disposal near where the	contractor(s) shall provide				
	waste originates as much as possible	temporary waste separation hins				
	Promote green technologies for long-distance	on-site during demolition and				
	transport of waste (e.g. clean engines and	construction These bins shall be				
	clean locomotives or electric rail for waste-by-	emptied and the contents recycled				
	rail disposal systems) and consistency with	accordingly as a part of the				
	SCAOMD and 2016 RTP/SCS policies can	project's regular solid waste				
	and should be required	disposal program				
	$\circ$ Encourage waste reduction goals and	alopotal program.				
	practices and look for opportunities for					
	voluntary actions to exceed the 50 percent					
	waste diversion target					
	<ul> <li>Encourage the development of local markets</li> </ul>					
	for waste prevention, reduction, and					
	recycling practices by supporting recycled					
	content and green procurement policies, as					
	well as other waste prevention, reduction and					
	recycling practices.					
	• Develop ordinances that promote waste					
	prevention and recycling activities such as:					
	requiring waste prevention and recvcling					
	efforts at all large events and venues:					
	implementing recycled content procurement					
	programs; and developing opportunities to					
	divert food waste away from landfills and					

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

	Drainat Laval Mitigation Managera	
Impact	Project – Level Miligation Measures	Applicability to the Project
-	(implemented by Lead Agency)	
	toward food banks and composting facilities.	
	<ul> <li>Develop alternative waste management</li> </ul>	
	strategies such as composting, recycling, and	
	conversion technologies.	
	<ul> <li>Develop and site composting, recycling, and</li> </ul>	
	conversion technology facilities that have	
	minimum environmental and health impacts.	
	<ul> <li>Require the reuse and recycle construction</li> </ul>	
	and demolition waste (including, but not	
	limited to, soil, vegetation, concrete, lumber,	
	metal, and cardboard).	
	<ul> <li>Integrate reuse and recycling into residential</li> </ul>	
	industrial, institutional and commercial	
	projects.	
	• Provide recycling opportunities for residents,	
	the public, and tenant businesses.	
	<ul> <li>Provide education and publicity about</li> </ul>	
	reducing waste and available recycling	
	services.	
	<ul> <li>Continue to adopt programs to comply with</li> </ul>	
	state solid waste diversion rate mandates	
	and, where possible, encourage further	
	recycling to exceed these rates.	
	<ul> <li>Implement or expand city or county-wide</li> </ul>	
	recycling and composting programs for	

Table 5.1Applicability of Project-Level Mitigation Measures from the2016-2040 Regional Transportation Plan / Sustainable Communities Strategy

publicity about recycling services.Source: Southern California Association of Governments, Final 2016 2016-2040 RTP/SCS ProgramEnvironmental Impact Report, Mitigation Monitoring and Reporting Program, April 2016.

residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and

## Section 6. Sustainable Communities Environmental Analysis

This section of the SCEA contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387).

Pursuant to PRC Section §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the Transit Priority Project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. The following analysis discusses the following topics:

- Aesthetics
- Agriculture
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning

- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal and Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings 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 SCEA, 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.

Additionally, 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 SCEA.

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 Section of this SCEA is based on the current Appendix G CEQA Thresholds and appropriately incorporates the VMT analysis for the proposed Project.

## 1. Aesthetics

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Excep 21099	t as provided in Public Resources Code Section would the project:				
a.	Have a substantial adverse effect on a scenic vista?				$\square$
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
C.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				$\boxtimes$

#### Senate Bill 743 - Environmental Quality: Transit Oriented Infill Projects

In 2013, the State of California enacted Senate Bill 743 (SB 743),<sup>25</sup> which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "Transit Priority Area" as an area within one-half mile of a Major Transit Stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "Major Transit Stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the

<sup>&</sup>lt;sup>25</sup> SB 743 is codified as Public Resources Code Section 21099.

morning and afternoon peak commute periods." Public Resources Code Section 21061.3 defines an "Infill Site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds of significance that were previously adopted in the *L.A. CEQA Thresholds Guide* (2006).

The Project Site meets the definition of Infill Site as it is currently developed with several buildings and a surface parking lot. The Project Site is located in a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.<sup>26</sup> Pursuant to the guidance in ZI-2452, visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA. The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express. The Project Site's proximity to the Vermont/Beverly Rail Station (less than 500 feet) provides transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. The bus lines within a "reasonable walking distance" (approximately onequarter mile) of the Project include (Metro Local Lines 14/37, 201, 204, Rapid Line 754, and the Metro Rail Red Line). The LADOT DASH line (DASH Wilshire Center/Koreatown) runs along Vermont Avenue, with the nearest bus stop located at W. 1<sup>st</sup> Street.

Accordingly, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers. Therefore, an assessment of the Project's potential aesthetics impacts is not required.

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

#### This discussion is for informational purposes only.

**No Impact.** No scenic views or vistas characterize the Project Site or immediately surrounding project area. The Project Site is located in the Wilshire Community Plan Area.

<sup>&</sup>lt;sup>26</sup> City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: http://zimas.lacity.org/, accessed May 2019.

The surrounding properties are developed with residential (including permanent supportive housing), commercial and light industrial/manufacturing uses. For this reason, even if the Proposed Project were subject to analysis of aesthetic impacts, the Proposed Project would not have the potential to have a substantial adverse effect on a scenic vista.

## b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

This discussion is for informational purposes only.

Less Than Significant Impact. The Project Site is developed with three commercial buildings, three single-family residential buildings, an office building and a surface parking lot. There are no rock outcroppings or unique geologic features on the Project Site. As discussed in Section 6.5, Cultural Resources, there are no historic resources on the Project Site. The Project Site is not bordered by or within the viewshed of any designated state scenic highways identified in the Mobility Element of the City of Los Angeles General Plan. Neither Oakwood Avenue, Madison Avenue, Juanita Avenue, nor Beverly Boulevard are designated as a state scenic highway. The Project Site does not contain any locally protected tree species.<sup>27</sup> There are three non-protected significant trees<sup>28</sup> on the Project Site and four street trees within the public right-of-way on Oakwood Avenue. The three on-site Queen Palm trees will be removed and replaced in accordance with Department of City Planning policies. As shown on the Landscape Plan, the Proposed Project will provide approximately 7,627 square feet of landscaped open space with 114 trees. Of the four street trees, three are proposed to remain in place and one is proposed for removal. The Red Cedar tree and two Canary Palms would remain in place, while the Weeping fig tree is proposed to be removed. As noted in the Tree Report, the Weeping Fig appears to have been intentionally planted by someone, but is recommended to be removed to allow for proper growing distance and preservation of the actual street trees. Tree removals within the public right-of-way are subject to the review and approval of the Department of Urban Forestry and replacement trees would be provided in accordance with the Urban Forestry's permit conditions. For these reasons, even if the Proposed Project were subject to analysis of aesthetic impacts, the impacts to scenic resources would be less than significant.

<sup>&</sup>lt;sup>27</sup> See Tree Report in Appendix K to this SCEA.

<sup>&</sup>lt;sup>28</sup> Significant trees are defined as having a diameter at breast height of 8" or more.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

This discussion is for informational purposes only.

**Less Than Significant Impact.** As discussed above, the Project Site is located in an urbanized area and is developed with a two-story office building above a one-level partially subterranean garage, three commercial buildings, three single-family residential buildings, and one surface parking lot. The Project Site is currently zoned M1-1 and has a land use designation of Limited Manufacturing. There is no height limit for development on the Project Site. The Proposed Project includes the demolition of the existing three commercial buildings and surface parking lot; the renovation of the existing two-story 5,663 square foot office building above a one-level partially subterranean garage, and the construction, operation, and maintenance of five eight-story multi-family buildings with support services.

As part of the construction process, the Applicant will 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 will 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 14.4.17, the Applicant is also required to maintain the construction barrier to be free and clear of any unauthorized signs and graffiti within 24 hours of occurrence. Compliance with these regulatory requirements will ensure the scenic quality of the Project Site during construction.

With respect to building design, the buildings have a single elevation, reaching a maximum building height of 95 feet. Exterior building materials/features include metal railings, composite siding, fiber cement siding, standing seam siding, vinyl clad windows and doors. As discussed in further detail in Section 6.11, Land Use, with approval of discretionary requests identified in Section 3, Project Description, the Proposed Project is in conformance with the Residential Citywide Design Guidelines, the Los Angeles Municipal Code (LAMC), and the applicable provisions of the General Plan governing scenic quality. For these reasons, even if the Proposed Project were subject to analysis of aesthetic impacts, the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality.

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

#### This discussion is for informational purposes only.

**No Impact**. The determination of whether a proposed project results in a significant nighttime illumination impact is generally made considering the following factors: (a) the change in ambient illumination levels as a result of the project sources; and (b) the extent to which the project lighting would spill off the project site and affect adjacent light-sensitive areas. Exterior lighting features within the Proposed Project consist of low-level illuminated pedestrian walkways and lighting within common open space areas and outdoor courtyards. On-site signage includes site identity and wayfinding signs in accordance with the LAMC. For these reasons, even if the Proposed Project were subject to analysis of aesthetic impacts, As such, no impacts would occur with respect to the Proposed Project's lighting impacts and impacts related to light trespass or glare.

#### Cumulative Impacts

#### This discussion is for informational purposes only.

**Less Than Significant**. As mentioned above, PRC Section 21099 provides that the aesthetic impacts of a residential project, such as the Proposed Project, upon an Infill Site within a Transit Priority Area shall not be considered significant impacts on the environment. For these reasons, even if the Proposed Project were subject to analysis of aesthetic impacts, cumulative aesthetic impacts would be less than significant.

## 6.2 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would	the project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				$\boxtimes$
C.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				$\boxtimes$
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				

#### a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

**No Impact.** A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The Project Site is currently occupied by three commercial buildings, three one-story single-family residential buildings, a two-story office building, and one surface parking lot. The Project Site is also located in an urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the "Los Angeles County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are

not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.<sup>29</sup> Therefore, no impact to agricultural lands would occur.

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

**No Impact.** The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC). The Project Site is zoned M1-1 with a General Plan land use designation of Limited Manufacturing. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.<sup>30</sup> Therefore, no impact would occur.

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

**No Impact.** The Project Site is zoned M1-1 and has a land use designation of Limited Manufacturing in the Wilshire Community Plan Area. The Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

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

**No Impact.** The Project Site is occupied by three commercial buildings, three singlefamily residential buildings, one two-story office building above a one-level partially subterranean garage, and one surface parking lot. The Project Site is also located in a highly urbanized area of the City of Los Angeles. No forested lands or natural vegetation exist on or in the vicinity of the Project Site. Therefore, no impact would occur.

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

**No Impact.** Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any "Farmland" category designated by the State of California. According to the "Los Angeles

<sup>&</sup>lt;sup>29</sup> State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, accessed May 2019.

<sup>&</sup>lt;sup>30</sup> Williamson Act Program, California Division of Land Resource Protection, website ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA\_15\_16\_WA.pdf, accessed May 2019.

County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site is not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impact would occur.

#### Cumulative Impacts

**No Impact.** Development of the Proposed Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2016 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.<sup>31</sup> The Project Site is located in a highly urbanized area in the Wilshire Community within the City of Los Angeles and does not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

## 6.3 Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would	the project:				
a.	Conflict with or obstruct implementation of the applicable air quality plan?			$\boxtimes$	
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				
C.	Expose sensitive receptors to substantial pollutant concentrations?			$\boxtimes$	
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				

<sup>&</sup>lt;sup>31</sup> Ibid.

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

**Less Than Significant Impact.** A significant air quality impact may occur if the Proposed Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Basin), the applicable AQMP is prepared by the South Coast Air Quality Management District (SCAQMD), which is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of AQMPs. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District (SCAQMD) on March 3, 2017 ("2016 AQMP"). 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 gasses 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.

In addition, SCAG approved their 2016 RTP/SCS that include transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (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 the State Implementation Plan (SIP) for the Air Basin, are based on SCAG's 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP.

As discussed in Section 6.14, the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2016 RTP/SCS to increase housing density within close proximity to High-Quality Transit Areas (HQTA). An HQTA is defined as an area within one half-mile of a Major Transit Stop High Quality Transit Corridor. The Proposed Project would concentrate new development and jobs within walking distance of the Vermont/Beverly Rail Station and several Metro bus lines that connect to all regions of the Los Angeles area. Thus, the Project Site's location provides opportunities for employees, guests, and visitors to use public transit to reduce vehicle trips. The Project Site is also located in a Transit Priority Area which is defined as an area within one-half mile of a Major Transit Stop. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency (EPA) and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption.<sup>32</sup> The Proposed Project's close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. Thus, because the Proposed Project would be consistent with the growth projections and regional land use planning policies of the 2016 RTP/SCS, the Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP, and Project impacts would be less than significant.

#### b) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

**Less Than Significant Impact**. A significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in State non-attainment for ozone  $(O_3)$ , PM<sub>10</sub> (respirable particulate matter) and PM<sub>2.5</sub> (fine particulate matter), related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of a project's contribution of emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific

<sup>&</sup>lt;sup>32</sup> See State of California Office of Planning and Research, <u>Changes to CEQA for Transit Oriented</u> <u>Development – FAQ</u>, accessed April 1, 2020.

impacts.<sup>33</sup> Thus, a project may result in a significant impact in cases where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As discussed below, the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. Therefore, the Proposed Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in non-attainment, and impacts would be less than significant.

#### **Construction Emissions**

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 24 months, with a final buildout year in 2023. This construction schedule is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing; (2) grading/excavation; (3) building construction; (4) architectural coating/finishing. The building construction phase includes the construction of the proposed building, connection of utilities to the building, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate  $PM_{2.5}$  and  $PM_{10}$  emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate  $NO_x$  emissions. The application of architectural coatings would primarily result in the release of Reactive Organic Gases (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

The Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*) as recommended by the SCAQMD. Table 6.1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project construction. These calculations assume that appropriate dust control

<sup>&</sup>lt;sup>33</sup> SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, South Coast Air Quality Management District, August 2003.

Emissions in Pounds per Day						
Emission Source	ROG	NOx	СО	SO <sub>2</sub>	<b>PM</b> <sub>10</sub>	PM <sub>2.5</sub>
Demolition/						
On-Site Fugitive Dust					0.21	0.03
On-Site Off-Road Diesel Equipment	2.00	19.70	14.49	0.02	1.04	0.97
Off-Site Hauling/Vendor/Worker	0.07	0.39	0.59	<0.01	0.16	0.04
Total Emissions	2.07	20.09	15.08	0.02	1.41	1.04
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Site Clearing			-			
On-Site Fugitive Dust					0.22	0.02
On-Site Off-Road Diesel Equipment	1.55	18.29	10.75	0.02	0.70	0.65
Off-Site Hauling/Vendor/Worker	0.16	3.83	1.25	0.01	0.36	0.11
Total Emissions	1.71	22.12	12.00	0.03	1.28	0.78
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Grading/Excavation			T			
On-Site Fugitive Dust					2.75	1.49
On-Site Off-Road Diesel Equipment	1.83	20.21	9.76	0.02	0.92	0.84
Off-Site Hauling/Vendor/Worker	0.14	3.17	1.15	0.01	0.34	0.10
Total Emissions	1.97	23.38	10.91	0.03	4.01	1.33
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Building Construction		10.00				
On-Site Off-Road Diesel Equipment	2.05	16.03	14.56	0.03	0.82	0.78
Off-Site Hauling/Vendor/Worker	1.72	5.81	14.41	0.05	4.01	1.10
Total Emissions	3.77	21.84	28.97	0.08	4.83	1.88
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Paving	0.04	0.00	44.70	0.00	0.40	0.45
On-Site Off-Road Diesel Equipment	0.94	9.33	11.70	0.02	0.49	0.45
Off-Site Hauling/Vendor/Worker	0.06	0.04	0.56	<0.01	0.17	0.05
I otal Emissions	1.00	9.37	12.26	0.02	0.66	0.50
SCAQIND Inresholds	/5 No	100	550	150 No	150 No	55 No
Significant Impact?	NO	NO	NO	NO	NO	NO
On Site Architectural Coating	16.22	[	<b>I</b>	T	0.00	0.00
On-Site Architectural Coaling	1 10	 8 00			0.00	0.00
Off-Site Hauling//endor/Morker	0.20	0.90	2 /2	<0.02	0.40	0.40
	17 71	0.19	2.4Z	0.01	0.73 1 10	0.20
I Uldi Elilissions	75	9.09 100	14.09	150	1.19	55
Significant Impact?	<u>15</u> No	No	No	No	No	No
Note: Calculations assume compliance with SCAOMD Rule 403 – Eugitive Dust and Rule 1113 – Architectural Coatings						
Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this SCEA.						

Table 6.1Estimated Peak Daily Construction Emissions

measures and compliance with the following SCAQMD Rules and regulations would be implemented as part of the Proposed Project during each phase of construction: .

- Site Clearing, Grading and Construction Activities: Compliance with provisions of the SCAQMD District Rule 403. The Proposed Project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
  - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
  - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
  - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
  - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
  - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
  - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
  - Trucks having no current hauling activity shall not idle but be turned off.
- The Proposed Project shall comply with South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound (VOC) Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.
- The Proposed Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).
- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet

specified fuel and fuel additive requirements and emission standards.

- The Proposed Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.
- The Proposed Project shall comply with South Coast Air Quality Management District Rule 1108 limiting the volatile organic compound content from cutback asphalt.
- The Proposed Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.
- New on-site facility nitrogen oxide emissions shall 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 South Coast Air Quality Management District Regulation XIII, New Source Review.

As shown in Table 6.1, construction-related daily emissions associated with the Proposed Project would be below the peak daily regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, construction impacts are considered to be less than significant.

#### **Operational Emissions**

#### Existing Emissions

The Project Site is currently developed with three one-story commercial buildings used for the commercial operation of a telecommunications company, three one-story single-family residential buildings, and one surface parking lot, which serves as the existing conditions baseline. Additionally, the Project Site includes a 5,663 square-foot two-story office building above a one-level partially subterranean garage at 3838 Oakwood Avenue.<sup>34</sup> The existing uses generate air pollutant emissions from stationary sources, such as space and water heating, architectural coatings (paint), and mobile vehicle traffic traveling to and from the Project Site. The peak daily emissions generated by the existing uses at the Project Site were estimated utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*). As shown in Table 6.2, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site.

<sup>&</sup>lt;sup>34</sup> The existing office building at 3838 Oakwood Avenue was not included within the Existing Operations emissions in Table 6.2 as it is not a part of the development site and no changes are proposed to the current land use or occupied floor area.
Emissions Source	Emissions in Pounds per Day					
Emissions Source	ROG	NOx	со	SOx	<b>PM</b> 10	PM <sub>2.5</sub>
Summertime (Smog Season) Emissions						
Area Sources	0.21	<0.01	0.25	<0.01	<0.01	<0.01
Energy Sources	<0.01	0.06	0.04	<0.01	<0.01	<0.01
Mobile Sources	0.43	2.10	6.51	0.02	1.56	0.43
Total Emissions	0.64	2.16	6.80	0.02	1.56	0.43
Winter	time (Non	-Smog Sea	ison) Emis	sions		
Area Sources	0.21	<0.01	0.25	<0.01	<0.01	<0.01
Energy Sources	<0.01	0.06	0.04	<0.01	<0.01	<0.01
Mobile Sources	0.42	2.18	6.14	0.02	1.56	0.43
Total Emissions	0.63	2.24	6.43	0.02	1.56	0.43
Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this SCEA.						

Table 6.2Existing Daily Operational Emissions from Project Site

#### Proposed Project Emissions

The Proposed Project includes the demolition of three existing commercial buildings used for the commercial operation of a telecommunications company, three existing single-family residential buildings, and one surface parking lot; the renovation of an existing 5,663 square-foot two-story office building above a one-level partially subterranean garage; and the construction, operation, and maintenance of five eight-story multi-family buildings with 454 dwelling units, and 11,772 square feet of ground floor supportive services. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod (*Version 2016.3.2*). The results of these calculations are presented in Table 6.3, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the daily regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

	Emissions in Pounda per Dov						
Emissions Source		Emis	ssions in P	ounas per	Day		
	ROG	NOx	СО	SOx	<b>PM</b> <sub>10</sub>	<b>PM</b> <sub>2.5</sub>	
Sumr	nertime (S	mog Seaso	on) Emissi	ons			
Area Sources	6.46	0.43	37.46	<0.01	0.21	0.21	
Energy Sources	0.12	1.01	0.43	<0.01	0.08	0.08	
Mobile Sources	0.95	3.94	13.14	0.05	4.23	1.16	
Stationary Sources	3.28	14.68	8.37	0.02	0.48	0.48	
Total Project Emissions	10.81	20.06	59.40	0.07	5.00	1.93	
Less Existing On-Site Emissions	(0.64)	(2.16)	(6.80)	(0.02)	(1.56)	(0.43)	
NET Project Emissions	10.17	17.90	52.60	0.05	3.44	1.50	
SCAQMD Thresholds	55	55	550	150	150	55	
Potentially Significant Impact?	No	No	No	No	No	No	
Winter	Wintertime (Non-Smog Season) Emissions						
		Smog Sea	5011) E111153	510115			
Area Sources	6.46	0.43	37.46	<0.01	0.21	0.21	
Area Sources Energy Sources	6.46 0.12	0.43 1.01	37.46 0.43	<0.01 <0.01	0.21 0.08	0.21 0.08	
Area Sources Energy Sources Mobile Sources	6.46 0.12 0.92	0.43 1.01 4.04	37.46 0.43 12.42	<0.01 <0.01 0.05	0.21 0.08 4.23	0.21 0.08 1.16	
Area Sources Energy Sources Mobile Sources Stationary Sources	6.46 0.12 0.92 3.28	0.43 1.01 4.04 14.68	37.46 0.43 12.42 8.37	<0.01 <0.01 0.05 0.02	0.21 0.08 4.23 0.48	0.21 0.08 1.16 0.48	
Area Sources Energy Sources Mobile Sources Stationary Sources Total Project Emissions	6.46 0.12 0.92 3.28 <b>10.78</b>	0.43 1.01 4.04 14.68 <b>20.16</b>	37.46 0.43 12.42 8.37 <b>58.68</b>	<0.01 <0.01 0.05 0.02 0.07	0.21 0.08 4.23 0.48 <b>5.00</b>	0.21 0.08 1.16 0.48 <b>1.93</b>	
Area Sources Energy Sources Mobile Sources Stationary Sources <b>Total Project Emissions</b> Less Existing On-Site Emissions	6.46 0.12 0.92 3.28 <b>10.78</b> (0.63)	0.43 1.01 4.04 14.68 <b>20.16</b> (2.24)	37.46 0.43 12.42 8.37 <b>58.68</b> (6.43)	<0.01 <0.01 0.05 0.02 0.07 (0.02)	0.21 0.08 4.23 0.48 <b>5.00</b> (1.56)	0.21 0.08 1.16 0.48 <b>1.93</b> (0.43)	
Area Sources Energy Sources Mobile Sources Stationary Sources <b>Total Project Emissions</b> Less Existing On-Site Emissions <b>NET Project Emissions</b>	6.46 0.12 0.92 3.28 <b>10.78</b> (0.63) <b>10.15</b>	Smog Sea           0.43           1.01           4.04           14.68           20.16           (2.24)           17.92	37.46 0.43 12.42 8.37 58.68 (6.43) 52.25	<0.01 <0.01 0.05 0.02 0.07 (0.02) 0.05	0.21 0.08 4.23 0.48 <b>5.00</b> (1.56) <b>3.44</b>	0.21 0.08 1.16 0.48 <b>1.93</b> (0.43) <b>1.50</b>	
Area Sources Energy Sources Mobile Sources Stationary Sources <b>Total Project Emissions</b> Less Existing On-Site Emissions <b>NET Project Emissions</b> <b>SCAQMD Thresholds</b>	6.46 0.12 0.92 3.28 <b>10.78</b> (0.63) <b>10.15</b> <b>55</b>	0.43         1.01           4.04         14.68           20.16         (2.24)           17.92         55	37.46 0.43 12.42 8.37 58.68 (6.43) 52.25 550	<0.01 <0.01 0.05 0.02 0.07 (0.02) 0.05 150	0.21 0.08 4.23 0.48 <b>5.00</b> (1.56) <b>3.44</b> 150	0.21 0.08 1.16 0.48 <b>1.93</b> (0.43) <b>1.50</b> <b>55</b>	
Area Sources Energy Sources Mobile Sources Stationary Sources <i>Total Project Emissions</i> <i>Less Existing On-Site Emissions</i> NET Project Emissions SCAQMD Thresholds Potentially Significant Impact?	6.46 0.12 0.92 3.28 <b>10.78</b> (0.63) <b>10.15</b> <b>55</b> No	Smog Seas           0.43           1.01           4.04           14.68           20.16           (2.24)           17.92           55           No	37.46 0.43 12.42 8.37 58.68 (6.43) 52.25 550 No	<0.01 <0.01 0.05 0.02 0.07 (0.02) 0.05 150 No	0.21 0.08 4.23 0.48 <b>5.00</b> (1.56) <b>3.44</b> <b>150</b> No	0.21 0.08 1.16 0.48 <b>1.93</b> (0.43) <b>1.50</b> <b>55</b> No	

Table 6.3Proposed Project Estimated Daily Operational Emissions

#### c) Expose sensitive receptors to substantial pollutant concentrations?

**Less Than Significant Impact.** A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.<sup>35</sup>

#### Localized Significance Thresholds

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the number of pounds of emissions per day that can be generated by a project that would

<sup>&</sup>lt;sup>35</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.

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,<sup>36</sup> apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. 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 source receptor area (SRA). For PM<sub>10</sub>, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For PM<sub>2.5</sub>, the LSTs were derived based on a general ratio of PM<sub>2.5</sub> to PM<sub>10</sub> for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles County area. The mass rate look-up tables provide LSTs for one-acre, two-acre, and five-acre sites. Since the portion of the Project Site to be graded is approximately two acres, the two-acre LSTs were conservatively applied for the Proposed Project. There are 10 sensitive receptors located within 500 feet of the Project Site that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project. These sensitive receptors are identified in Figure 6.1, Air Quality Sensitive Receptors. Given the proximity of these sensitive receptors to the Project Site, the LSTs for a two-acre site with receptors located within 25 meters was used to address the potential localized air quality impacts associated with the construction-related NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions for each construction phase.<sup>37</sup>

#### Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose nearby sensitive receptors to harmful pollutant concentrations. However, as shown in Table 6.4, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate two-acre site in SRA 1. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during construction, as required by

<sup>&</sup>lt;sup>36</sup> South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.

<sup>&</sup>lt;sup>37</sup> This threshold addresses all sensitive receptors within a 25 meter radius of the Project Site.



Source: Google Earth, Aerial View, 2019.



Figure 6.1 Air Quality Sensitive Receptors

Construction Phase <sup>a</sup>	Total On-site Emissions (Pounds per Day)					
Construction Phase	NO <sub>x</sub> <sup>b</sup>	CO	<b>PM</b> 10	PM <sub>2.5</sub>		
Demolition	19.70	14.49	1.25	1.00		
Site Clearing	18.29	10.75	0.92	0.67		
Grading/Excavation	20.21	9.76	3.67	2.33		
Building Construction	16.03	14.56	0.82	0.78		
Paving	9.33	11.70	0.49	0.45		
Architectural Coatings	8.90	12.26	0.46	0.45		
SCAQMD Localized Thresholds <sup>c</sup>	108	1,048	8	5		
Potentially Significant Impact?	No	No	No	No		

 Table 6.4

 Localized On-Site Peak Daily Construction Emissions

<sup>a</sup> The localized thresholds for all phases are based on a receptor within a distance of 25 meters in SCAQMD's SRA 1 for a Project Site of two acres.

<sup>b</sup> The localized thresholds listed for NO<sub>x</sub> takes into consideration the gradual conversion of NO<sub>x</sub> to NO<sub>2</sub>, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO<sub>x</sub> emissions is focused on NO<sub>2</sub> levels as they are associated with adverse health effects. Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this SCEA.

Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this SCEA.

SCAQMD Rule 403 - Fugitive Dust. Specific 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. Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

#### Localized Operational Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The Air Basin is currently designated as a CO attainment area for both the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS). The Basin has been in attainment for CO since 2007, and CO levels in SRA 1 remain substantially below the federal and state standards. The maximum CO levels in the Basin during 2016 were recorded at 1.9 ppm (parts per million) (one-hour average) and 1.4 ppm (eight-hour average), compared to the thresholds of 20 ppm (one-hour

average) and 9.0 ppm (eight-hour average).<sup>38</sup> In its 2003 AQMP, the SCAQMD conducted CO hot-spot analyses at the four worst-case intersections in the Air Basin. 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 approximately 100,000 vehicles per day. The data provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at all four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing [2003] background CO concentrations, the worst-case CO levels in the Basin was estimated to be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average), respectively, which is below the CO thresholds of significance for both the CAAQS and NAAQS. The AQMP therefore concluded that because the Basin is in attainment for CO, and the studied congested intersections do not exceed state thresholds, CO hotspots are less than significant under extreme conditions. As discussed above, recent ambient CO levels in 2016 are substantially lower than they were in 2003. The volume of traffic at the closest study intersections, Intersection #4, Vermont Avenue and Oakwood Avenue; Intersection #5, Vermont Avenue and Beverly Boulevard; and Intersection #9, Beverly Boulevard and Temple Street and Westmoreland Avenue are substantially lower than the studied intersections in the 2003 AQMP study. Therefore, it is reasonable to conclude that the Proposed Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California onehour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Therefore, no further analysis for CO hotspots is warranted, and localized operational emissions would be less than significant.

#### **Toxic Air Contaminants (TAC)**

#### **Construction TAC Emissions**

The Proposed Project's construction activities would generate toxic air contaminants (TAC) in the form of diesel particulate matter (DPM) emissions associated with the use of heavy trucks and construction equipment during construction. DPM has no acute exposure factors (i.e., no short-term effects). Therefore, the SCAQMD Handbook does not recommend an analysis of TACs from short-term construction activities, which result in a limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk.

<sup>&</sup>lt;sup>38</sup> The most recent annual ambient air quality data is for the year 2016, http://www.aqmd.gov/docs/default-source/air-quality/historical-data-by-year/2016-air-quality-datatables.pdf?sfvrsn=14, accessed May 2019.

Specifically, "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 24 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 risks are anticipated after construction. Because there is such a short-term exposure period (24 out of 840 months of a 70-year lifetime), health risks associated with DPM emissions during construction would be less than significant. Moreover, the Proposed Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location. In addition, as discussed above, the Proposed Project would not result in a less than significant impact. Therefore, the Proposed Project would result in a less than significant impact related to construction TACs.

#### **Operational Emissions**

The Proposed Project consists of a residential development and would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic TACs. As such no significant toxic airborne emissions would result from Proposed Project implementation. In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

### d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Potential sources that may emit odors during construction activities at the Proposed Project include the use of architectural coatings, solvents, and asphalt paving during construction. The Proposed Project will comply with SCAQMD Rules 1108 and 1113, which limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively.

With respect to operations, 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. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Garbage collection areas for the Proposed Project would have the potential to generate foul odors if the areas are located in close

proximity to habitable areas. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance) and 1139 (Odors), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations. Therefore, potential operational odor impacts would be less than significant.

#### Cumulative Impacts

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects would result in an increase in construction and operational emissions in an already highly urbanized area of the City of Los Angeles.

#### AQMP Consistency

Cumulative development can affect implementation of the 2016 AQMP. The 2016 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 2016 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 2016 AQMP will 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. Thus, cumulative impacts related to conformance with the 2016 AQMP would be less than significant.

#### Construction and Operational Emissions

Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed above, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

#### Odor Impacts

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at the Proposed Project and each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Moreover, none of the related projects are located in close enough proximity to the Proposed Project as to cause cumulative odor impacts. Furthermore, based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project would not combine with other projects to create objectionable construction odors. With respect to operations, SCAQMD Rules 402 (Nuisance) and 1139 (Odors) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the related projects and the Proposed Project's long-term operations. Thus, cumulative odor impacts would be less than significant.

#### 6.4 Biological Resources

	_	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would	the project:				
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?				
C.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				



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



#### a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) 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; or (c) 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.

The Project Site is located in an urbanized area in the City of Los Angeles and is improved with three commercial buildings, three single-family residential buildings, a two-story office building above a one-level partially subterranean garage, and a surface parking lot. The Project Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Based on the Proposed Project's Tree Report contained in Appendix K to this SCEA, no protected native tree species are located on-site or in the public right-of-way adjacent to the Project Site. There are three non-protected significant trees<sup>39</sup> on the

<sup>&</sup>lt;sup>39</sup> Significant trees are defined as having a diameter at breast height of 8" or more.

Project Site and four street trees within the public right-of-way on Oakwood Avenue. The three on-site Queen Palm trees will be removed and replaced in accordance with Department of City Planning policies. As shown on the Landscape Plan, the Proposed Project will provide approximately 7,627 square feet of landscaped open space with 114 trees. Of the four public street trees, three will be retained in place and one is proposed for removal. The Red Cedar tree and two Canary Palms are recommended to remain in place, while the Weeping Fig tree is proposed to be removed. As noted in the Tree Report, the Weeping Fig appears to have been intentionally planted by someone, but is recommended to be removed to allow for proper growing distance and preservation of the actual street trees. Tree removals within the public right-of-way are subject to the review and approval of the Department of Urban Forestry's permit conditions. Therefore, the Proposed Project would have a less than significant impact upon removal of non-protected on-site trees and public trees.

The removal of vegetation and disturbances to potential bird habitat creates the potential to result in a take<sup>40</sup> of nesting native bird species. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Wildlife Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The Department of City Planning enforces the MBTA through precautionary and preventative measures to avoid or reduce the potential for disturbances to wildlife during construction. The Applicant will be required to ensure compliance with all applicable laws and regulations to ensure that no significant impacts to nesting birds would occur due to the removal of the existing trees located on the Project Site. As a standard practice, the Department of Building and Safety generally imposes a condition that requires grading and earthwork activities (including disturbances to native and non-native vegetation, structures and substrates) to take place outside of the breeding bird season which generally runs from March 1 – August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If the Proposed Project's activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the Applicant would be required to arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. If a protected native bird is found, the Applicant would be required to delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species

<sup>&</sup>lt;sup>40</sup> Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Wildlife Code Section 86).

until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. Therefore, with adherence to existing laws and regulations, the Proposed Project would have a less than significant impact on sensitive biological species or habitat.

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

**No Impact.** A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) 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; (c) the alternation of an existing wetland habitat; or (d) 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. The Project Site is occupied by three commercial buildings, three single-family residential buildings, and a surface parking lot. No riparian or other sensitive natural community is located on or adjacent to the Project Site. Therefore, implementation of the Proposed Project would result in no impact to riparian habitat or other sensitive natural communities.

# c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

**No Impact.** A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat, as defined by Section 404 of the Clean Water Act (CWA). The Project Site is entirely developed and covered with impermeable surfaces and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Section 6.4, above) and no impacts to riparian or wetland habitats would occur with implementation of the Proposed Project.

# 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?

**No Impact.** A project would normally have a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may

diminish the chances for long-term survival of a sensitive species. The Project Site is improved with three commercial buildings, three single-family residential buildings, and a surface parking lot. Vegetation in the vicinity of the Project Site is limited to ornamental landscaping. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Proposed Project vicinity. Therefore, the Proposed Project would not substantially interfere with the movement of any resident or migratory fish or wildlife species, therefore no impact would occur.

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

**Less Than Significant Impact.** A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. As discussed above, the Project Site does not contain any locally protected tree species.<sup>41</sup> Three on-site Queen Palm trees will be removed and replaced in accordance with Department of City Planning policies. As shown on the Landscape Plan, the Proposed Project will provide approximately 7,627 square feet of landscaped open space with 114 trees. Of the four public street trees, one is proposed for removal. Tree removals within the public right-of-way are subject to the review and approval of the Department of Urban Forestry and replacement trees would be provided in accordance with the City's protected Native Tree Ordinance and subject to Urban Forestry's permit approval process. Thus, the Proposed Project would not conflict with any local policies, or ordinances protecting biological resources and impacts would be considered less than significant.

#### 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?

**No Impact.** A significant impact would occur if the proposed project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project.

<sup>&</sup>lt;sup>41</sup> See Tree Report in Appendix K to this SCEA.

#### Cumulative Impacts

Less Than Significant Impact. The Proposed Project would have a less than significant impact upon biological resources with adherence to applicable regulatory compliance measures. Development of the Proposed Project in combination with related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS) as no such habitat occurs in the vicinity of the Project Site due to the existing urban development. Moreover, development of the related projects is expected to occur in accordance with adopted plans and regulations. Each of the related projects would be subject to discretionary City approval and project-specific CEQA review that would address biological resources. Thus, cumulative impacts to biological resources would be less than significant.

#### 6.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
<ul> <li>Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?</li> </ul>				$\square$
<ul> <li>b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?</li> </ul>			$\boxtimes$	
c. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Cod, Ch. 1.75 §5097.98, and Health and Safety Code §7050.5(b))??				

This section summarizes and incorporates by reference information from the following report:

<u>B.1: Historical Built Environment Report for the Enlightenment Plaza / Juanita</u> <u>Avenue Project, City of Los Angeles, California (</u>"Historic Resource Assessment"), prepared by Dudek, dated April 2020.

B.2: Archaeological and Paleontological Resources Assessment for the Enlightenment Plaza / Juanita Avenue Project, Los Angeles, California

("Archaeological and Paleontological Resource Assessment"), prepared by Dudek, dated April 22, 2020.

### a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?

**No Impact.** A significant impact may occur if the Proposed Project results in a substantial adverse change in the significance of a historic resource. State CEQA Guidelines Section 15064.5 defines a historical resource as: (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; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource of a historic resource means.

Section 15064.5(b)(2) of the CEQA Guidelines provides that "[t]he significance of an historical resource is materially impaired when a project:

(a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and

<sup>&</sup>lt;sup>42</sup> CEQA Guidelines, Section 15064.5(b)(1).

that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The Project Site is currently occupied by three commercial buildings used for the commercial operation of a telecommunications company, three single-family residential buildings, and a paved surface parking lot. The Proposed Project includes demolition of these existing buildings, the renovation of an existing 5,663 square-foot two-story office building above a one-level partially subterranean garage, and the construction, operation, and maintenance of five eight-story multi-family buildings.

The Project Site does not contain any on-site structures listed on the National Register of Historic Resources (NRHP), California Register of Historic Resources (CRHR), or City of Los Angeles Historic Cultural Monument (HCM)<sup>43,44</sup> or listed as potentially historic resources on the City of Los Angeles's citywide survey (SurveyLA).<sup>45</sup> Additionally, there are no off-site historic resources within the vicinity of the Proposed Project. Therefore, the development of the Proposed Project would have no impact to historical resources.

The Historic Resource Assessment (see Appendix B.1 to this SCEA) provides an analysis of the manufacturing buildings and residential buildings on the Project Site. The Historic Resource Assessment's findings for 3820 Oakwood Avenue<sup>46</sup>, 3812 Oakwood Avenue, and 316 Juanita Avenue are discussed below.

#### 3820 Oakwood Avenue:

### *Criterion A/1: Are associated with events that have made a significant contribution to the broad patterns of our history.*

Archival research did not find any association with events that have made significant contributions to the broad patterns of local or regional history. 3820 Oakwood Avenue was established in 1963 as Stanley Construction Company office space, during a period of commercial and industrial growth in the area. The construction of the building was merely following this pattern of development in the area and there is no indication that the construction of this specific business marked a pivotal point in the history of Los Angeles.

<sup>&</sup>lt;sup>43</sup> City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed May 2019.

<sup>&</sup>lt;sup>44</sup> City of Los Angeles, Historic Places LA, Los Angeles Historic Resources Inventory, website: http://historicplacesla.org/map, accessed May 2019.

<sup>&</sup>lt;sup>45</sup> City of Los Angeles, Office of Historic Resources, SurveyLA, Wilshire Community Plan Area, website: http://preservation.lacity.org/sites/default/files/Wilshire%20CPA%20Individual%20Resources\_2.pdf, accessed May 2019.

<sup>&</sup>lt;sup>46</sup> As noted in Table 3.1 on page 17, the property identified as "3820 Oakwood Avenue" in the Historic Resources Survey is the same property as 3838 Oakwood Avenue. Both addresses are identified as APN 5501-001-025.

In 1971, the building's current occupants engineering firm Mackintosh & Mackintosh, Inc. relocated to the building. Archival research did not reveal that this connection between the engineering firm and the subject property had direct associations with events that have made a significant contribution to the history of the nation, state, or city. Therefore, the 3820 Oakwood does not appear eligible under NRHP/CRHR Criterion A/1.

#### *Criterion B/2: Are associated with the lives of persons significant in our past.*

To be found eligible under B/2, 3820 Oakwood Avenue must be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research did not indicate that any previous property owner, including the owners of Stanley Construction Company and Mackintosh & Mackintosh, Inc., or any individual who worked for a business previously located at the 3820 Oakwood Avenue was known to be historically significant figures at the national, state, or local level. Despite the building's association with its longest occupant Mackintosh & Mackintosh, Inc., who is credited for having brought quality standards for concrete block masonry construction, the firm's largest accomplishments –forming the Concrete Masonry Association and publishing a masonry standards manual—occurred before they relocated to the subject property in 1971. As such, 3820 Oakwood Avenue does not appear to be associated with any individual's important historic work and, therefore, does not appear eligible for the NRHP under Criterion B or CRHR under Criterion 2.

#### Criterion C/3: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Research indicates that the Stanley Construction Company built the subject property in 1963, designed by the architecture firm Robert H. Peterson & Associates. The 3820 Oakwood Avenue displays some of the characteristics of the Mid-Century Modern architectural style; however, it is an unremarkable example. 3820 Oakwood Avenue contains only basic character defining features of the style and, in comparison to other Mid-Century Modern buildings found both locally and regionally, it appears to be less than distinguishable. In addition, Mackintosh & Mackintosh, Inc. made several alterations to the building including adding a second floor to the previously open-air entry stoop that compromised the integrity of the original design. For these reasons, 3820 Oakwood Avenue does not appear eligible for listing in the NRHP under Criterion C or CRHR under Criterion 3.

### Criterion D/4: Have yielded, or may be likely to yield, information important in prehistory or history.

The 3820 Oakwood Avenue is not significant under Criterion D of the NRHP or Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic construction methods, materials or technologies.

#### Summary of Evaluation Findings (3820 Oakwood Avenue)

In conclusion, 3820 Oakwood Avenue does not appear eligible for listing in the NRHP, CRHR, or City of Los Angeles HCM due to a lack integrity necessary to convey its historical associations or architectural significance. This resource has been assigned a California Historical Resource Status Code of 6Z (found ineligible for the NRHP, CRHR, or local designation through survey evaluation). As such, 3820 Oakwood Avenue does not appear to be a historical resource for the purposes of CEQA.

#### 3812 Oakwood Avenue:

### *Criterion A/1: Are associated with events that have made a significant contribution to the broad patterns of our history.*

The buildings at 3812 Oakwood Avenue were developed between 1924 and 1934 as rentable, single-family dwellings, with proprietor on site. Two buildings were Pacific Ready-Cut homes, however are not part of typical residential development patterns of single-building properties or bungalow courts. Within the SurveyLA Wilshire Community Plan Area-identified contexts of streetcar suburbanization 1888-1933 on account of being on the Temple Street Cable Railroad line (along Beverly Boulevard) and the Cahuenga Valley Line (Beverly Boulevard and Western Avenue), the buildings could be considered part of the housing boom culminating in the 1920s, specifically afforded by being on or adjacent to a streetcar or railroad line.

However, even though the buildings at 3812 Oakwood Avenue represent this theme, subsequent alteration, including the addition of a garage in 1934 and changing all the buildings from single-family residences to storage in the 1960s has removed all association with this theme. These alterations and changes from the historical use have resulted in the buildings not retaining any association with their original owner, their original rentable single-family home use, or their streetcar suburb origins. Due to alteration issues and a lack of integrity of association with events important to history, 3812 Oakwood Avenue does not appear eligible under NRHP Criterion A or CRHR Criteria 1.

#### *Criterion B/2: Are associated with the lives of persons significant in our past.*

To be found eligible under B/2 the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research did not indicate that Mrs. Hannah Olincy, or any subsequent property owners or individuals who have worked at the 3812 Oakwood Avenue are known to be historically significant figures at the national, state, or local level. As such, 3812 Oakwood Avenue does not appear to be associated with any individual's important historic work, and therefore does not appear eligible for the NRHP under Criterion B or CRHR under Criterion 2.

#### Criterion C/3: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Research indicates that two of the buildings at 3812 Oakwood Avenue are Pacific Ready-Cut Homes, purchased and built in 1924, built in a simplified Craftsman style. Major alterations to the buildings, including the addition of a fourth 2-story garage and residence and the demolition of the third Pacific Ready-Cut Home building have diminished association both with this home's manufacturer and with the architectural style. Alterations include new windows and doors, interior alteration to the Pacific Ready-Cut interior plans, and the addition of solar panels on the roof – all of which diminish integrity of material and workmanship, which are critical to eligibility under NRHP and CRHR Criterion C/3. The building does not possess high artistic values or represent a significant and distinguishable entity whose components may lack individual distinction. For these reasons, 3812 Oakwood Avenue does not appear eligible for listing in the NRHP under Criterion C or CRHR under Criterion 3.

### Criterion D/4: Have yielded, or may be likely to yield, information important in prehistory or history.

3812 Oakwood Avenue is not significant under Criterion D of the NRHP or Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic construction methods, materials or technologies.

#### Summary of Evaluation Findings (3812 Oakwood Avenue)

In conclusion, 3812 Oakwood Avenue does not appear eligible for listing in the NRHP, CRHR, or City of Los Angeles HCM due to a lack integrity necessary to convey its historical associations or architectural significance. The property also does appear eligible

as a contributor to an historic district. This resource has been assigned a California Historical Resource Status Code of 6Z (found ineligible for the NRHP, CRHR, or local designation through survey evaluation). As such, 3812 Oakwood Avenue does not appear to be a historical resource for the purposes of CEQA.

#### 316 Juanita Avenue

### Criterion A/1: Are associated with events that have made a significant contribution to the broad patterns of our history.

Research indicates that 316 Juanita Avenue was established in 1959 as a Pacific Telephone & Telegraph operation center. The existing SurveyLA historic context statement for Telephone History and Development indicates that the construction date places the property within "The Era of Technological Innovation, 1945-1974" which spans from the end of WWII to 1974, when the AT&T telecom monopoly was forced to break up. According to this context, telephone industry related buildings may be eligible under Criterion A or C in the areas of Communications, Community Planning and Development or Architecture.

316 Juanita Avenue appears utilitarian in nature and is not known as a site where technological innovations were pioneered, utilized, or advanced. Therefore, 316 Juanita Avenue cannot be considered significant under the Communications Area of Significance.

For the Community Planning and Development Area of Significance, resources must "show how a key urban service grew to provide for the needs of residents in new districts, and constructed facilities in those districts that served as landmarks due to their size and placement in highly visible locations." However, 316 Juanita Avenue did not bring new service to the Dayton Heights neighborhood, as one had already been established in 1924 at 1251-1255 N. Vermont Avenue, Hollywood just one mile to the north. It was also not a large facility nor on a major right-of-way and may not be considered a landmark due to size or prominent location. Therefore, 316 Juanita Avenue cannot be considered significant under the Community Planning and Development Area of Significance.

Outside of the Telephone History and Development historic context for Los Angeles, the 316 Juanita Avenue is not individually related to events which have made a significant contribution to the broad patterns of history. Due to a lack of significant associations with events important to history, 316 Juanita Avenue does not appear eligible under NRHP Criterion A or CRHR Criteria 1.

#### Criterion B/2: Are associated with the lives of persons significant in our past.

Archival research did not indicate that any previous property owners or individuals who have worked at 316 Juanita Avenue were known to be historically significant figures at

the national, state, or local level. As such, this property is not known to have any historical associations with people important to the nation's or state's past. Furthermore, to be found eligible under B/2, the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. 316 Juanita Avenue does not appear to be associated with any individual's important historic work, and therefore, does not appear eligible for the NRHP under Criterion B or CRHR under Criterion 2.

# Criterion C/3: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Research indicates that 316 Juanita Avenue was established in 1959 and designed by Robert H. Peterson & Associates in a restrained Mid-Century Modern style for the operation center, and utilitarian style for the remaining buildings. The existing SurveyLA historic context statement for Telephone History and Development indicates that the construction date places the property within "The Era of Technological Innovation, 1945-1974" which spans from the end of WWII to 1974, when the AT&T telecom monopoly was forced to break up. According to this context, telephone industry related buildings may be eligible under wither Criterion A or C in the areas of Communications, Community Planning and Development, or Architecture.

Though 316 Juanita's operation center building was built in the typical commercial architectural pattern of the period (1959, Mid-Century Modern), it does not employ the distinctive characteristics of the Mid-Century Modern style. The building has been highly altered by subsequent infill and window coverings, which diminish the integrity of the operation center. The auto garage, storage building, and equipment storage are utilitarian buildings that do not embody a specific architectural style or method of construction. The buildings do not possess high artistic values or represent a significant and distinguishable entity whose components may lack individual distinction. For these reasons, none of the buildings at 316 Juanita Avenue appear eligible for listing in the NRHP under Criterion C or CRHR under Criterion 3.

### Criterion D/4: Have yielded, or may be likely to yield, information important in prehistory or history.

316 Juanita Avenue is not significant under Criterion D of the NRHP or Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic construction methods, materials or technologies.

#### Summary of Evaluation Findings (316 Juanita Avenue)

In conclusion, 316 Juanita Avenue does not appear eligible for listing in the NRHP, CRHR, or City of Los Angeles HCM due to a lack of important historical associations and architectural significance, nor does it appear eligible as a contributor to an historic district. This property has been assigned a California Historical Resource Status Code of 6Z (found ineligible for the NRHP, CRHR, or local designation through survey evaluation). As such, the buildings located at 316 Juanita Avenue do not appear to be a historical resources for the purposes of CEQA.

#### Summary of Evaluation Findings (All Sites)

There are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Proposed Project. The Proposed Project would have a less than significant impact on the historic and potentially historic resources near the Project Site, as the Proposed Project does not directly abut any historic resources and would not result in a substantial adverse change to the immediate surroundings of any historical resource to the degree it would no longer be eligible for listing under national, state, or local landmark designation programs. No mitigation is required or recommended. Therefore, the development of the Proposed Project would have a less than significant impact to surrounding historical resources.

### b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

**Less Than Significant Impact.** A significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources, which presently exist within the Project Site. The Project Site has been previously developed and graded. The Project Site and immediate surrounding areas do not contain any known archaeological resources.<sup>47</sup> For purposes of assessing the project's potential impacts upon archaeological resources, the following analysis summarizes the findings of the <u>Archaeological and Paleontological Resources Assessment for the Enlightenment Plaza</u> / Juanita Avenue Project, Los Angeles, California ("Archaeological and Paleontological Resource Assessment"), prepared by Dudek dated April 22, 2020. (See Appendix B.2 to this SCEA).

<sup>&</sup>lt;sup>47</sup> City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric & Historical Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.

#### SCCIC Records Search

A California Historical Resources Information System (CHRIS) records search was conducted at the South Central Coastal Information Center (SCCIC) on April 8, 2019 for the Project Site and surrounding 0.5-mile search buffer. This search included collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the Project Site, the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility.

Results of the cultural resources records search indicated that 22 previous cultural resource investigations have been conducted within the records search area between 1987 and 2014. Two of these studies identified overlap the Project Site and neither study identified archaeological resources within 0.5-mile of the Study Area.

Sixteen (16) previously recorded cultural resources have been documented within a 0.5mile of the Project Site. None of these intersect the Project Site and all 16 resources are historic-era buildings or structures. Furthermore, as discussed in Section 6.18 Tribal Cultural Resources, below, no cultural resources of Native American origin are documented within the Project Site or surrounding 0.5-mile search area of files held at the SCCIC.

#### NAHC Sacred Lands File Search

As part of the process of identifying cultural resources within or near the Project Site, Dudek contacted the NAHC to request a review of the Sacred Lands File (SLF) on April 4, 2019. The NAHC emailed a response on April 25, 2019, which indicated that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project Site. Documents related to the NAHC SLF search are included in Appendix H of the Archaeological Resource Assessment. See Section 6.18 regarding Tribal Cultural Resources.

#### Archival Research

Dudek consulted historic maps and aerial photographs to understand development of the Project Site and surrounding properties. The first USGS topographic map showing the Project Site dates to 1894 and shows that there was at least one structure within the Study Area and a few other structures in the general vicinity. The review of the historic aerials and topographic maps indicates that of the seven structures existing within the Project Site, the three extant residential structures at 3812 Oakwood Avenue in APN 5501-001-023, were constructed by at least 1941. At 316 Juanita Avenue, within APN 5501-001-800, there are currently three structures. The rectangle structure along the western boundary, was built between 1956 and 1960. The smaller rectangle structure in the center of APN 5501-001-800, directly east of the building developed between 1956 and 1960, was built after 1972. Prior to this time, the center of APN 5501-001-800 was paved or undeveloped. The small shed -like structure in the northeastern more corner of APN 5501-001-800 was built between 1980 and 1989. The seventh building within the proposed Project Site, located at 3820 Oakwood Avenue, within APN 5501-001-025, was built between 1962 and 1965.

Within the Study Area, the large structure currently associated with the MX Collision Center, within APN 5501-001-026, was built between 1965 and 1972. The rectangular structure currently associated with Dewey Pest Control within APN 5501-001-027, was initially developed between 1927 and 1941, and was later renovated between 1956 and 1960. The Quonset Hut currently associated with Dewey Pest Control, within 5501-001-028, was built between 1948 and 1952. Finally, the building currently associated with Midway Car Rental Hollywood, within APN 5501-001-019, was built between 1956 and 1960. No cultural resources were identified within, or in the vicinity of, the Project Site through a CHRIS records search, SLF search, or archival research. Therefore, compliance with the provisions of 14 CCR 15064.5(f) would ensure that the environmental impacts associated with the inadvertent discovery of significant archaeological resources would be reduced to a less than significant level.

# c) Disturb any human remains, including those interred outside of formal cemeteries (see Public Resources Code, § 5097.98, and Health and Safety Code § 7050.5(b))?

**Less Than Significant Impact.** A project-related significant adverse effect could occur if grading activities associated with the Proposed Project would disturb previously interred human remains. Based on the findings of the Archaeological Resource Assessment (see Appendix B of this SCEA), there is no evidence that the Project Site has been used or historically associated with any human internment sites. As such, the likelihood of encountering human remains during construction is low. Pursuant to Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery and no further excavation or disturbance of the Project Site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the Coroner determines that the remains are, or are believed to be, Native American, he or

she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the Project Site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. Compliance with regulatory compliance measures would ensure that if any such remains are found during construction of the Proposed Project, they would be handled according to the proper regulations, and impacts to human remains would be less than significant.

#### Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following compliance with standard regulatory measures. Therefore, the Proposed Project's incremental contribution to impacts upon archaeological resources would not be considerable, and cumulative impacts to cultural resources would be less than significant.

#### 6.6 Energy

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would	the project:				
a.	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			$\boxtimes$	

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

**Less Than Significant Impact (responses a and b)**. Appendix F: Energy Conservation of the State CEQA Guidelines states the goal of conserving energy implies the wise and efficient use of energy. The State CEQA Guidelines outlines three means to achieve this goal: (1) Decreasing overall per capita energy consumption, (2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and (3) Increasing reliance on renewable energy sources.

The determination of whether a project results in a significant impact on energy conservation shall be made considering the following factors: a) the extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities; b) whether and when the needed infrastructure was anticipated by adopted plans; and c) the degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

The Proposed Project would develop five eight-story multi-family residential buildings on an infill site, which would contribute to the revitalization of the Wilshire Community Plan Area. As a residential project, the Proposed Project is required to comply with the energy conservation standards established in Title 24 of the California Code of Regulations. 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," was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically (approximately three-year cycle) to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The 2016 Standards will continue to improve upon the 2013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The effective date of the 2016 Standards is January 1, 2017.<sup>48</sup> The Energy Efficiency Standards are a specific response to the mandates of AB 32 and to pursue California

<sup>&</sup>lt;sup>48</sup> California Energy Commission, 2016 Building Energy Efficiency Standards, website: http://www.energy.ca.gov/title24/2016standards/, accessed May 2019.

energy policy that energy efficiency is the resource of first choice for meeting California's energy needs.

The L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. The Proposed Project includes energy efficiency components to conserve energy, which are discussed below.

#### Existing Infrastructure

The Project Site is located in a highly urbanized area in the Wilshire area. The surrounding area is served by overhead electrical systems. The Proposed Project would require onsite transformation and may require line extensions on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the project area and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the Proposed Project's immediate vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant.

#### Energy Consumption

#### Construction

Energy would be consumed during construction of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction of the Proposed Project would require the export of 3,040 cy of soil, 845 cy of asphalt, and 9,399 square feet of building debris from the Project Site during the demolition/site clearing phase. The demolition phase of the Proposed Project would generate additional haul trips and diesel fuel would be consumed by heavy equipment during the demolition, site clearing, and construction process. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period. In addition to diesel fuel and vehicular fuel, an unquantifiable amount of electricity and natural gas would be consumed as a result of the temporary construction process. Construction equipment and activities do not generally involve the use of natural gas.

In order to quantify the amount of diesel and gasoline fuel utilized for the Proposed Project's construction, the equipment usage, horsepower, load factors, and fuel rates from construction activities calculated in the CalEEMod program for the Proposed Project were utilized to estimate the gallons of diesel and gasoline consumed (Appendix C, Energy Demand Calculation Worksheets). Table 6.5 below, shows the estimated electricity and transportation energy consumed during the construction.

<u> </u>	
Fuel Type	Quantity
Electricity <sup>a,b</sup>	
Water Use	3,878 kWh
Gasoline	
On-Road Vehicles (Workers Trips)	1,071,661 gallons
Diesel	
On Road Construction Equipment (Vendors/Deliveries)	80,391 gallons
On Road Construction Equipment (Haul Trips)	2,267 gallons
Off-Road Construction Equipment	20,083 gallons
Subtotal Diesel	102,741 gallons
Notes: <sup>a</sup> Water Application Rate = 3,020 gal/acre/day per A Association Air Pollution Engineering Manual (1992 Edit <sup>b</sup> Electricity consumption per water usage = 0.009727 kW Source: Parker Environmental Consultants, 2019; Calculati Energy Demand Calculation Worksheets, to this SCEA	Air & Waste Management ion). h/gallon. ons provided in Appendix C,

 Table 6.5

 Estimated Energy Usage During Project Construction

As shown, the Proposed Project would consume approximately 3,878 kWh of electricity, and 1,174,402 gallons of transportation fuel, including 102,741 gallons of diesel and 1,071,661 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. The Proposed Project will also comply with Sections 2485 in Title 13 of the California Code of Regulations, which requires the idling of all diesel fueled commercial vehicles be limited to five minutes at any location. Accordingly, energy demands during construction would be less than significant.

#### Operation

#### Electricity

As shown in Table 6.6, below, the estimated net increase in electricity consumption by the Proposed Project would be approximately 1,597,932 kWh per year. As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The Proposed Project would also be required to comply with the L.A. Green Building Code, which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. Therefore, compliance with Title 24 of the California Code of Regulations and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption. Additionally, as discussed above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been considered in the planned growth of the City's power system.

Land Use	Size	Total Electricity Demand (kWh/year) <sup>a</sup>		
Existing Uses				
Light Manufacturing	7,810 sf	86,691		
Single Family Residential	3 DU	23,927		
Total Existin	110,618			
Proposed Uses				
Multi-Family Residential	454 du	1,708,550		
Total Proposed Proje	ct Electricity Demand:	1,708,550		
Existing Electricity Dem	and (to be demolished):	-110,618		
NET TOTAL Electricity Demand: 1,597,932				
Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour <sup>a</sup> SCAQMD, CalEEMod Version 2016.3.2, See Appendix E, GHG Worksheets to this SCEA. Source: Parker Environmental Consultants, 2019.				

Table 6.6Estimated Electricity Consumption by the Proposed Project

The Proposed Project would include energy conservation features. Specifically, the residential units would include energy efficient lighting fixtures, ENERGY STAR-rated appliances for residential dwelling units, low-flow water features, and energy efficient mechanical heating and ventilation systems. Thus, energy demands during operation would be less than significant.

#### Natural Gas

Natural gas for the Project Site is provided by Southern California Gas Company (SCG). Gas supply available to SCG from California sources averaged 51 million cf/day in 2018. Interstate pipeline delivery capability into SCG on any given day is theoretically approximately 6,665 million cf/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SCG's estimated physical capacity of upstream pipelines. SCG's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cf. However, due to the current inventory restrictions imposed at the Aliso Canyon site, working inventory for SoCalGas is reduced. The California Public Utilities Commission (PUC), in June 2018, proposed that a maximum inventory of 34 billion cubic feet be authorized for maximum inventory.<sup>49</sup>

SCG projects total natural gas demand to decrease at an annual rate of 0.5 percent per year from 2018 to 2035. This decrease is due to more efficient power plants, pursuing demand-side reductions, and the acquisition of preferred power generation resources that produce little or no carbon emissions. Thus, with the natural gas consumption becoming more efficient and decreasing, the SCG's projection for natural gas also decreases.

As shown in Table 6.7, below, the natural gas consumption as a result of the operation of the Proposed Project, approximately 307,191 cf per month, would represent a very small fraction of one percent of the SCG's existing natural gas storage capacity and therefore, would be within the SCG's existing natural gas storage capacity of 34 billion cf as of 2018.

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. 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 conservation measures. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy beyond those required by Title 24 of the California Code of Regulations. Thus, natural gas demands during operation would be less than significant.

<sup>&</sup>lt;sup>49</sup> California Gas and Electric Utilities, 2018 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/2018\_California\_Gas\_Report.pdf, accessed May 2019.

Land Use	Size	Total Natural Gas Demand (kBTU/yr) <sup>a</sup>	Total Natural Gas Demand (cf/month) <sup>b</sup>
Existing Uses			
Light Manufacturing	7,810 sf	141,361	11,544
Single Family Residential	3 DU	82,489	6,737
Total Existing Natu	Iral Gas Demand:	223,850	18,281
Proposed Project			
Multi-Family Residential	454 du	3,985,370	325,472
Total Proposed Project Natu	Iral Gas Demand:	3,985,370	325,472
Less Existing Nat	ural Gas Demand:	-223,850	-18,281
NET TOTAL Natu	Iral Gas Demand:	3,761,520	307,191
Notes: sf =square feet; du = dwelling	unit	Groonbouse Gas V	Vorkshoots

Table 6.7 Estimated Natural Gas Consumption by the Proposed Project

CalEEMod Version 2016.3.2, See Appendix E, Greenhouse Gas Worksheets.

<sup>b</sup> 1kBTU is equivalent to 0.98 cubic feet of natural gas.

Source: Parker Environmental Consultants, 2019.

#### Fossil Fuels

The Proposed Project would generate a demand on fossil fuels as a result of the vehicle trips traveling to and from the Project Site. As discussed in Section 6.17 (Transportation/Traffic) the estimated daily trips associated with the Proposed Project would be approximately 407 net trips. Table 6.8, below, shows the estimated amount of gasoline demand from vehicles traveling to and from the Proposed Project. Assuming an average fuel efficiency of 28.35 mpg for gasoline and 6.27 mpg for diesel, it is estimated that the operation of the Proposed Project would generate an increased net annual demand for approximately 11,971 gallons of diesel and 41,476 gallons of gasoline per year over existing conditions.<sup>50</sup>

However, the Proposed Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas, and oil. The Project Site is located in the Wilshire area, which is highly connected to the regional transit network in the Los Angeles area. Public transportation within the Project Site consists primarily of multiple-stop, local-serving bus lines that provide access to shopping, business, and

<sup>50</sup> Fuel rates are based on per Table 7, Statewide Vehicle Fuel Economy Miles Per Gallon of the 2007 California Motor Vehicle Stock Travel and Fuel Forecast (May 2008).

	Annual VMTs (miles) <sup>a</sup>	Fuel Rate (mpg) <sup>b</sup>	Total Fuel Demand (gallons/year)
Diesel			
Existing (to be demolished)	43,162.44	6.27	(6,884)
Proposed Project	118,215.66	6.27	18,855
	Net Diesel Consumption:		
Gasoline			
Existing (to be demolished)	676,211.56	28.35	(23,852)
Proposed Project	1,852,045.34	28.35	65,328
	Net Gasolin	e Consumption:	41,476
Notes: VMTs = vehicle miles <sup>a</sup> Appendix E, Greenhouse assumed that 94% of VM are associated with diesel <sup>b</sup> Source: Table 7, Statewin Motor Vehicle Stock Trave Parker Environmental Consu	traveled; mpg = miles p Gas Emissions: Total Ts are associated with -powered vehicles. de Vehicle Fuel Econo al and Fuel Forecast (M Itants, 2019. (See Appe	per gallon Annual VMTs from ( gasoline-powered ve my Miles Per Gallo lay 2008) andix C. Energy Den	Operational Mobile; It is ehicles and 6% of VMTs n of the 2007 California nand Calculation

Table 6.8Proposed Project's Estimated Transportation Energy Consumption

entertainment destinations in the Project vicinity, although some regional/commuter public transit opportunities, including nearby railway, are also present. The Proposed Project is within 500 feet of the Vermont/Beverly Rail Station. The bus service in the Project vicinity is operated primarily by the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express. Specifically, a total of 5 bus lines serve the Project Site, including Metro Local Lines 14/37, 201, 204, Rapid Line 754, and the Metro Rail Red Line). The LADOT DASH Line (DASH Wilshire Center/Koreatown) runs along Vermont Avenue, with the nearest bus stop located at W. 1<sup>st</sup> Street. Additionally, while some bus lines and/or other transit services in the general Project vicinity are considered to be too distant from the Project Site (generally, more than one-quarter mile) to be used directly, these services can be accessed via connections to or transfers from these site-serving lines to provide access for the Proposed Project's residents, visitors, and employees between the Project Site and the larger regional area. Due to its proximity to the rail and bus lines aforementioned, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

Worksheets)

Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some residents and/or visitors would take transit to their destinations, or would walk to destinations nearby.

The Proposed Project introduces various streetscape improvements to encourage more pedestrian-friendly street edges along Juanita and Madison Avenues. The sidewalk on Madison Avenue adjacent to the Proposed Project will be widened up to 12 feet wide in most locations. On Juanita Avenue existing 12 foot sidewalks will be retained. Existing sidewalk widths will also be maintained on Oakwood Avenue. Utility poles fronting the property along Madison, Oakwood and Juanita Avenues will be relocated underground creating more continuous sidewalks. Additionally, nine new street trees will be placed along these three street frontages. Twelve new bike racks will be strategically located along both Juanita and Madison Avenues. These streetscape improvements will aid in all streets adjacent to the Proposed Project becoming more pedestrian and bicycle oriented.

The Project Site's location in a transit-oriented district and its provision of bicycle parking and streetscape amenities, including pedestrian-scaled landscaping and street furniture, would therefore decrease the Proposed Project's reliance on fossil fuels.

#### Renewable Energy

The LADWP's 2016 Power Integrated Resource Plan (IRP) 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 2016 IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The 2016 IRP outlines an aggressive strategy for LADWP to accomplish its goals and provide sufficient resources over the next 20 years given the information presently available, including the following major strategic initiatives:

- Eliminate Coal from LADWP's Power Supply by replacing IPP by 2025;
- Reach 33 percent renewable portfolio standard (RPS) by 2020, 50 percent by 2025, 55 percent RPS by 2030, and 65 percent RPS by 2036, including a goal of 900 MW Local Solar by 2025 and 1,500 MW Local Solar by 2035;
- Implement 404 MW of Energy Storage by 2025;
- Achieve 15 percent energy efficiency by 2020;
- Eliminate the use of Once-through Cooling by Repowering Coastal Units by 2029;
- Invest in the Power System Reliability Program; and

• Promote a high scenario of Transportation Electrification.

As the Proposed Project would derive its electricity from the LADWP, the Proposed Project's energy demands would primarily be derived from renewable energy sources. On a project specific level, the Proposed Project includes the following features which, would further reduce energy demands:

*Proximity to Mass Transit*: The Project Site is an Infill Site within a Transit Priority Area as defined by CEQA. The Project Site is located approximately 500 feet from the Vermont/Beverly Rail Station and within approximately one-quarter mile of numerous bus routes with peak commute service intervals of 15 minutes or less and an existing transit stop.

- 1. *In-Fill Site*: The Proposed Project is located on an existing Infill Site that is currently developed with three commercial buildings used for the commercial operation of a telecommunications company, three single-family residential buildings, and one surface parking lot. The Project Site is located in a highly developed area of the Wilshire Community, which is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.
- 2. *Trip Reduction*: In addition to its location in a Transit Priority Area, the Proposed Project would provide 225 on-site bicycle parking spaces pursuant to the requirements of the SNAP including 12 rack along the perimeter of the Project Site. The Proposed Project also provides various streetscape improvements discussed above.
- 3. *Resource Conservation*: As mandated by the *L.A. Green Building Code*, the Proposed Project would be required to meet Title 24 2016 standards and include ENERGY STAR-rated appliances. The Proposed Project would incorporate energy conservation features in the proposed residential units such as low-flow water fixtures and energy conservation appliances.

Therefore, with incorporation of the features identified above, the Proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Proposed Project construction or operation or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Energy impacts would therefore be less than significant.

#### Cumulative Impacts

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects would further increase demand for electricity, natural, and fossil fuels but the Proposed Project's contribution would not be cumulatively considerable.

#### Electricity

The Proposed Project and related projects would further increase demand for electricity service provided by LADWP. 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. 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 Code of Regulations 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. Cumulative impacts to electricity service would therefore be less than significant.

#### Natural Gas

Development of the Proposed Project in conjunction with the related projects would further increase regional demands for natural gas resources. As mentioned above, the Proposed Project would represent a very small fraction of one percent of the SCG's existing natural gas storage capacity and therefore, would be within the SCG's existing natural gas storage capacity of 34 billion cf as of 2018. As a public utility provider, the SCG 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 of the California Code of Regulations would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine the SCG's

ability to serve each related project. As such, it is anticipated the related projects and the Proposed Project would be accommodated by SCG. Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

#### Fossil Fuels

The Proposed Project and related projects would cumulatively increase the demand for transportation energy. The Department of Transportation's National Highway Traffic Safety Administration (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. Additionally, a majority of the related projects are located within a Transit Priority Area, which is an area within ½ mile of a Major Transit Stop. Therefore, the related projects' locations would promote other modes of transportation such as walking, biking, and public transit options. 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.

#### 6.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
Would the project:					
<ul> <li>Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:</li> </ul>					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.					
ii. Strong seismic ground shaking?			$\boxtimes$		
iii. Seismic-related ground failure, including liquefaction?			$\boxtimes$		
iv. Landslides?				$\boxtimes$	
		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
------	--	--------------------------------------	--	------------------------------------	-----------
b.	Result in substantial soil erosion or the loss of topsoil?			$\boxtimes$	
C.	Be located on a geologic unit 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?				
d.	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?				
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				$\square$
f. C	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			$\boxtimes$	

The following section summarizes and incorporates by reference information from the following report:

- <u>Geotechnical Engineering Investigation, Proposed Apartment Development, 312</u> <u>through 328 North Juanita Avenue and 317 through 345 North Madison Avenue,</u> <u>Los Angeles, California,</u> prepared by Geotechnologies, Inc., dated May 22, 2019 ("Geotechnical Investigation"). The Geotechnical Investigation is included as Appendix D to this SCEA.
- 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? Refer to Division of Mines and Geology Special Publication 42.

**Less Than Significant Impact.** A significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. Based on criteria established by the California Division of Mines and Geology (CDMG), now called

California Geologic Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive for most purposes, with the exception of design of some critical structures. Surface rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake.

Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. The risk for surface fault rupture potential of these buried thrust faults is inferred to be low. However, the seismic risk of these buried structures in terms of recurrence and maximum potential magnitude is not well established. Therefore, the potential for surface rupture at magnitudes higher than 6.0 cannot be precluded.

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines "active" and "potentially active" faults utilizing the same aging criteria as that used by the CGS, described above. However, established State policy has been to zone only those faults which have direct evidence of movement within the last 11,000 years.

The Geotechnical Investigation concluded that no known active faults or potentially active faults underlie the Project Site. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. Therefore, the potential for surface ground rupture due to faulting occurring beneath the Project Site during the design life of the proposed structure is considered low.

In addition, the Proposed Project would be required to comply with the 2019 City of Los Angeles Building Code, updated since the 1994 Northridge Earthquake, which contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk.

According to ZIMAS, the Project Site is located approximately one mile from a known active fault, which is the Puente Hills Blind Thrust Fault. Thus, the Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Based on these considerations, the Project Site is considered suitable for the construction of the Proposed Project provided that the

recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. Sign off from the Department of Building and Safety would ensure that the Proposed Project meets the applicable performance measures. Accordingly, with the design and construction of the Proposed Project in conformance with the California Building Code seismic standards and approval by the Department of Building and Safety, the Proposed Project would not expose people or structures to substantial adverse effects associated with fault rupture, caused in whole or in part by the Proposed Project's impacts associated with seismic hazards would be less than significant.

#### ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exacerbating existing hazardous environmental conditions by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. As discussed above, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and was concluded to have a low potential for surface rupture beneath the Project Site. However, the nearest earthquake fault, the Puente Hills Blind Thrust Fault, is located approximately one mile from the Project Site. Therefore, 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. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

The Geotechnical Investigation concluded that neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development provided the recommendations presented in the Geotechnical Investigation are followed and implemented during design and construction. Additionally, the Proposed Project would be required to comply with current engineering standards, the seismic safety requirements set forth in the Earthquake Regulation of the City of Los Angeles Building Code (LABC), the Los Angeles Municipal Code (LAMC), and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, as it may be subsequently amended or modified. Therefore, with compliance with applicable regulations and implementation of the recommendations in the Geotechnical Investigation and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter would be implemented for the Proposed Project, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to strong seismic ground shaking. As such, the Proposed Project's impacts would be less than significant.

#### iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A project would have a significant impact related to geology and soils if it exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of the existing environmental conditions. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California" requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

According to the City of Los Angeles Safety Element, the Project Site is not located within an area identified as having a potential for liquefaction. Additionally, based on the Geotechnical Investigation, the Seismic Hazards Maps for the State of California (CDMG, 1999) does not classify the Project Site as part of the potentially "Liquefiable" area. This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial earthquake. Groundwater was encountered during exploration in three of the five exploratory borings, conducted to a maximum depth of 50 feet below the existing grade. Water seepage was observed to depths ranging between 11.5 and 12.5 feet below the existing grade. The characteristics of the water seepage likely represents a perched water table condition where differences in permeability within earth material allows a finite amount of water to develop above an impermeable zone. The Geotechnical Investigation concluded that the encountered seepage does not represent the static groundwater level.

The historically highest groundwater level for the Project Site is not well defined for the project site. The closest contour is almost a mile to the northwest and corresponds to a

depth of 20 feet below grade. Based on the density of the older alluvium and bedrock, the Project Site is not susceptible to liquefaction. The Proposed Project shall also comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, and as it may be subsequently amended or modified. Therefore, compliance with the above regulatory compliance measures, impacts associated with the seismic related hazards including liquefaction would be less than significant.

#### iv) Landslides?

**No Impact.** A project would have a significant impact related to geology and soils if the Proposed Project exposes people or structures to potential substantial adverse effects. including the risk of loss, injury, or death involving landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site is not located within a City of Los Angeles Hillside Grading Area and not within a Hillside Ordinance Area. Additionally, the Project Site is not within an area identified as having a potential for slope instability according to the City of Los Angeles Safety Element. Furthermore, the Project Site and surrounding area not within an area identified as having a potential for seismic slope instability as designated by the "State of California Seismic Hazard Zones" map. The Geotechnical Investigation states that the probability of seismically-induced landslides occurring on the Project Site is considered to be low due to the gentle topographic relief observed across or adjacent to the Project Site. The Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to landslides, and no impact would occur.

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

**Less Than Significant Impact.** A project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) 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.

Although development of the Proposed Project has the potential to result in the erosion of soils during grading, excavation, 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. Minor amounts of erosion and siltation could occur during grading. All grading activities require grading permits from the Department of Building and Safety, 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. All grading activities require grading permits from the Department of Building and Safety. The application of Best Management Practices ("BMPs") includes but is not limited to the following regulatory compliance measures: (1) Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity; and (2) Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

Additionally, prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. The Applicant shall 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 shall identify construction 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. Compliance with regulatory measures will ensure a less than significant impact would occur with respect to erosion or loss of topsoil during construction.

Furthermore, the Geotechnical Investigation provided recommendations regarding foundations and temporary grading during construction of the Proposed Project. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. Compliance with the standard conditions imposed by the City of Los Angeles Department of Building and Safety, as specified in the Soils Report Approval Letter, will further ensure that impacts to soil erosion or the loss of topsoil are reduced to less than significant levels.

#### c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

**Less Than Significant Impact.** A project would have a significant impact related to geology and soils if it is located on a geologic unit 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 caused in whole or in part by a project's exacerbation of existing environmental conditions.

For the purpose of this specific issue, a significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Investigation concluded that the Project Site is not susceptible to liquefaction. Lateral spreading and collapse are types of liquefaction-induced ground failures. Since the potential for liquefaction is low, the potential for lateral spreading or collapse on the Project Site is also low. Additionally, as discussed above, the probability of seismically induced landslides occurring on the Project Site is considered low due to the gentle topographic relief observed across or adjacent to the Project Site. Based upon the exploration, laboratory testing, and research, the Geotechnical Investigation concluded that construction of the Proposed Project is considered feasible from a geotechnical engineering standpoint provided the advice and recommendations presented in the Geotechnical Investigation are followed and implemented during construction. With the implementation of the recommendations contained within the Geotechnical Investigation and the Building Code requirements as discussed above in Section 6.7 (a), the potential for geologic hazards would be reduced to a less than significant level.

#### d) 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?

Less Than Significant Impact. A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these 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.

As discussed in the Geotechnical Investigation, subsurface exploration involved drilling five borings to a maximum depth of approximately 50 feet below the existing grade. An expansion index test was performed for the on-site soils and was found to range between the low and moderate expansion range (between 3 and 89). The Proposed Project would incorporate the recommended reinforcing noting in the "Slabs on Grade" section of the Geotechnical Investigation. With incorporation of the recommendations provided in the Geotechnical Investigation and compliance with the Building Code requirements, impacts related to expansive soil would be less than significant.

# e) 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?

**No Impact.** This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Thus, no impact would occur.

### f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has been previously developed and graded. The Project Site and immediate surrounding areas do not contain any unique geologic features or known vertebrate paleontological resources.<sup>51</sup> This is further supported by correspondence received from the Natural History Museum of Los Angeles County (NHMLA) dated April 18, 2019, which states that no vertebrate fossil localities lie within the project site boundaries; however, they do have localities within the one-half mile buffer and outside the buffer but nearby from the same sedimentary deposits that occur subsurface. Below the surficial Quaternary alluvium, which is generally too young to preserve fossils, there are likely Pleistocene or Ice Age older Quaternary deposits and/or late Miocene shale deposits that have the potential to produce significant fossils. The closest vertebrate fossil locality from older Quaternary deposits, NHMLA 3250, produced a fossil mammoth (mammuthus) less than one-half kilometer north of the Proposed Project near the intersection of Madison Avenue and Middlebury Street from approximately eight feet below the street surface. NHMLA reported a fossil mastodon (mammutidae) from approximately five to six feet below the ground surface near the intersection of Western Avenue and Council Street, southwest of the Project Site.

NHMLA recommends paleontological monitoring below the upper few feet of alluvium and collection of sediment samples to determine micro-vertebrate fossil productivity.

However, consistent with the standard conditions of approval applied to development projects, if paleontological resources are discovered during excavation, grading, or

<sup>&</sup>lt;sup>51</sup> City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.

construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines. With adherence to the standard conditions and regulatory compliance measures, any impacts to paleontological resources would be less than significant.

#### Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little. if any, cumulative geological relationship between the Proposed Project and related projects in the project area. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement applicable regulatory compliance measures and any required mitigation measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts concluded that, through the implementation of standard conditions and regulatory compliance measures and recommendations in the Geotechnical Investigation, Project impacts would be reduced to less than significant levels. Furthermore, with respect to paleontological resources, the regulatory compliance measure detailed above, would ensure Project impacts to paleontological resources are less than significant level. Because the discovery of paleontological resources would be geographically limited to the immediate area of the find, the potential for cumulative impacts to occur with respect to paleontological resources would be less than significant. Therefore, the Proposed Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology, soil, and paleontological resources impacts would be less than significant.

### 6.8 Greenhouse Gas Emissions

Would the project:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

	Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
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#### GHG and Global Climate Change Background

Gases that trap heat in the atmosphere are called greenhouse gases ("GHG"), since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California.

The principal GHGs are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H<sub>2</sub>O). CO<sub>2</sub> is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO<sub>2</sub> equivalents (CO<sub>2</sub>e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

#### Regulatory Environment

#### Executive Order S-3-05

Executive Order S-3-05, issued in June 2005 by Governor Arnold Schwarzenegger (Governor Schwarzenegger), established GHG emissions targets for the State, as well as a process to ensure the targets are met. The order directed the California Environmental Protection Agency (CalEPA) to report every two years on the State's progress toward meeting the Governor's GHG emission reduction targets. The Statewide GHG targets established by Executive Order S-3-05 are as follows:

- By 2010, reduce statewide emissions to 2000 emission levels;
- By 2020, reduce statewide emissions to 1990 emission levels;
- By 2050, reduce statewide emissions to 80 percent below 1990 levels.

#### Executive Order B-30-15

Executive Order B-30-15, issued by Governor Brown in April 2015, established an additional statewide policy goal to reduce GHG emissions to 40 percent below 1990 emission levels by the year 2030.

#### Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Executive Order B-55-18 directs CARB to would work with relevant state agencies to develop a framework for implementation and accounting that tracks progress toward this goal as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

#### Assembly Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is 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. As previously determined by CARB, California projected it needed to

reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "businessas-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.<sup>52</sup> 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.

#### Climate Change Scoping Plan

In December 2008, CARB approved a Climate Change Scoping Plan. The Climate Change Scoping Plan calls for a "coordinated set of solutions" to address all major categories of GHG emissions. The Initial Scoping Plan in 2008 presented the first economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California's 2020 GHG emissions cap while ensuring progress in all sectors. The coordinated set of policies in the Initial Scoping Plan employed strategies tailored to specific needs, including market-based compliance mechanisms, performance standards, technology requirements, and voluntary reductions. The Initial Scoping Plan also described a conceptual design for a cap-and-trade program that included eventual linkage to other cap-and-trade programs to form a larger regional trading program.

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.<sup>53</sup> It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In December 2017, CARB adopted "California's 2017 Climate Change Scoping Plan" that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor's

<sup>&</sup>lt;sup>52</sup> CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% as the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.

 <sup>&</sup>lt;sup>53</sup> Executive Order S-30-15 established three targets: 1) By 2010, reduce GHG emissions to 2000 levels;
 2) By 2020, reduce GHG emissions to 1990 levels; 3) By 2020, reduce GHG emissions to 80 percent below 1990 levels. Executive Order B-16-2012 facilitated the commercialization of zero-emission vehicles and reestablished the 2050 target to reduce GHG emissions to 80 percent below 1990 levels.

Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

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. The 2017 Scoping Plan reflects the direction from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the 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.

#### Cap-and-Trade Program

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the greenhouse gas (GHG) emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap will be able to trade permits (allowances) to emit GHGs.

Cap-and-trade is a market-based regulation that is designed to reduce greenhouse gases (GHGs) from multiple sources. Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur technological innovation and investments in clean energy. The Proposed Project would be exempt from the Cap-and-Trade program, since it only proposes residential and commercial uses and does not propose any industrial or high-emitting land uses. On July 2018, CARB recently announced that greenhouse gas pollution in California fell below

1990 levels, which was the 2020 greenhouse gas emissions goal passed by AB 32.54

#### California Senate Bills 1078, 107, and 2; Renewables Portfolio Standard

Established in 2002 under California Senate Bill 1078 and accelerated in 2006 under California Senate Bill 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010.

On April 2, 2011, Governor Jerry Brown signed California Senate Bill 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

#### Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the Low Carbon Fuel Standard (LCFS) as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

#### Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (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. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

With respect to motor vehicles, page 48 of the 2008 Scoping Plan states that local governments will play a significant role in the regional planning process to reach

<sup>&</sup>lt;sup>54</sup> California Air Resources Board, "Climate Pollutants Fall Below 1990 Levels for First Time" https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time, accessed August 2018.

passenger vehicle greenhouse gas emissions reduction targets. Local governments have the ability to directly influence both the siting and design of developments in a way that reduces greenhouse gases associated with vehicle travel, as well as energy, water, and waste. A partnership of local and regional agencies is needed to create a sustainable vision for the future that accommodates population growth in a carbon efficient way while meeting housing needs and other planning goals. Integration of the sustainable communities' strategies or alternative planning strategies with local general plans will be key to the achievement of these goals. State, regional, and local agencies must work together to prioritize and create the supporting policies, programs, incentives, guidance, and funding to assist local actions to help ensure regional targets are met. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in helping to reach regional targets. Thus, based on the above targets noted in the Scoping Plan, a new development Project that can demonstrate it directly influences both the siting and design of new developments in a way that reduces greenhouse gases associated with vehicle travel would be considered consistent with statewide GHG-reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

#### 2016-2040 RTP/SCS

On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016-2040 RTP/SCS). Within the RTP, the SCS demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS sets forth a regional 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 proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. 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% in 2020, 18% in 2035, and 21% 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.

#### <u>SCAQMD</u>

SCAQMD has released draft guidance regarding interim CEQA GHG significance thresholds. In October 2008, 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 of CO2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

#### Local Policies and Regulations

The City is addressing the issue of global climate change through implementation of the Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO<sub>2</sub> to 35 percent below 1990 levels by the year 2030. To achieve this goal, 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.

#### 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). 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 set out an ambitious vision for cutting greenhouse gas 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. L.A. has already reduced its greenhouse gas emissions by 20% below 1990 levels as of 2013, nearly halfway to the goal of 45% below by 2025. The City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

Since 2015, Mayor Garcetti has released an expanded vision for the Sustainable City pLAn, called L.A.'s Green New Deal. Released in 2019, the update to the Sustainable City pLAn sets new energy efficiency and sustainability goals that will transition the City of Los Angeles to a more resilient, sustainable, and equitable energy future. That future will be realized, in part, by the 2050 targets that are spelled out in the plan that include goals for: renewable energy, local water, clean and healthy buildings, housing and development, mobility and public transit, zero emission vehicles, industrial emissions and air quality monitoring, waste and resource recovery, food systems, urban ecosystems and resilience, environmental justice, prosperity and green jobs, and lead by example. Further discussion of the L.A. Green New Deal, as well as consistency analysis with the applicable targets of the plan, can be found in the Land Use Section.

#### L.A. Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the *L.A. Green Building Code* requires new development projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code by 20%, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. New development projects are required to comply with the *L.A. Green Building Code*, and therefore are generally considered consistent with statewide GHG-reduction goals and policies, including SB 32.

#### GHG Significance Threshold

The SCAQMD, the State CEQA Guidelines, and the City do not provide any guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a residential project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a residential project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the Proposed Project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the Proposed Project increases greenhouse gas emissions as compared to the existing environmental setting; and (4) the extent to which the Proposed Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Guidelines Section 15064.4 states a lead agency "should consider," among other factors, "[t]he extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting" (id., subd. (b)(1)) and "[w]hether the project emissions exceed a threshold of significance that the lead agency determines applies to the project" (id., subd. (b)(2). The Guidelines, however, do not mandate the use of absolute numerical thresholds to measure the significance of greenhouse gas emissions.

For purposes of this analysis, a significant impact would occur if the Proposed Project's design features are not substantially consistent with the applicable policies and/or regulations outlined in the Scoping Plan, SB 375, SCAG's 2016-2040 RTP/SCS, and the LA Green Building Code.

## a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

#### Less Than Significant Impact.

#### Construction

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the approximate 24-month duration of construction activities.

Emissions of GHGs were calculated using CalEEMod (Version 2016.3.2) for each year of construction of the Proposed Project and the results of this analysis are presented in Table 6.9, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table 6.9, the total GHG emissions from the Proposed Project's construction activities would be 1,348 tons with the greatest annual emissions occurring in 2022. As recommended by the SCAQMD, the total GHG construction emissions are amortized over the projected 30-year lifetime of the Proposed Project to be factored into the Proposed Project's operational emissions in order to determine the Proposed Project's annual GHG emissions inventory.

Year	CO₂e Emissions (Metric Tons per Year) ª
2021	459
2022	791
2023	98
Total Construction GHG Emissions	1,348
Amortized Annual Emissions <sup>b</sup>	44.93
<ul> <li><sup>a</sup> Construction CO<sub>2</sub> values were derived Calculation data and results are provid Emissions Worksheets.</li> <li><sup>b</sup> Consistent with SCAQMD recomme construction emissions, the total construct 30-year projected lifetime.</li> </ul>	using CalEEMod Version 2016.3.2 ed in Appendix E, Greenhouse Gas ended methodology for addressing ction emissions were amortized over a

 Table 6.9

 Proposed Project Construction-Related Greenhouse Gas Emissions

#### **Baseline Operational GHG Emissions**

The Project Site is developed with three commercial buildings, three single-family residential buildings, and one surface parking lot, which serves as the existing conditions baseline. Additionally, the Project Site includes a 5,663 square-foot two-story office building above a one-level partially subterranean garage at 3838 Oakwood Avenue.<sup>55</sup> The operations of the on-site commercial and residential uses generate GHG emissions as a result of vehicle trips and building operations involving the use of electricity, natural gas, water, and generation of solid waste and wastewater. The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table 6.10 Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with operation of the existing Project Site Greenhouse Gas Emissions, the existing operations of the Project Site generate approximately 424.09 CO<sup>2</sup>e MTY.

<sup>&</sup>lt;sup>55</sup> The existing office building at 3838 Oakwood Avenue was not included within the Existing GHG Operations emissions in Table 6.2 as it is not a part of the development site and no changes are proposed to the current land use or occupied floor area.

Emissions Source	CO₂e Emissions (Metric Tons per Year)		
Area	0.05		
Energy	73.75		
Mobile	325.54		
Waste	6.72		
Water	18.03		
Total	424.09		
Calculation data and results provided in Gre Calculations Worksheets. (See Appendix E to this	eenhouse Gas Emissions s SCEA)		

Table 6.10 Existing Project Site Greenhouse Gas Emissions

#### **Project GHG Emissions**

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated using the CARB approved CalEEMod emissions model. As shown in Table 6.11, below, the gross increase in GHG emissions generated by the Proposed Project is approximately 2,370.95 CO2e MTY. The Proposed Project's net GHG emissions after accounting for the displacement of existing land uses on an infill lot would result in a net increase of 1,946.95 CO2e MTY. As stated above, there are no adopted quantitative thresholds of significance for GHG impacts for residential projects. However, it should be noted that the Proposed Project's GHG emissions are below the SCAQMD's previously proposed interim CEQA GHG significance thresholds for commercial/residential projects, which was 3,000 metric tons of CO2e per year.

For purposes of disclosing the Proposed Project's GHG reduction measures and design features, the Proposed Project's structural and operational features would include installing energy efficient lighting, low flow plumbing fixtures, ENERGY STAR-rated appliances, and implementing an operational recycling program during the life of the Proposed Project. When considering the fact that the Project is a dense residential infill development in a transit- rich area, which is encouraged through the state, regional and local plans and policies (i.e., SB 32, SB 375, and SCAG's 2016 RTP/SCS growth strategy), the Proposed Project would realize an approximate 26% reduction in GHG emissions as compared to a project of the same size that is not located on an infill lot and that does not meet the energy conservation standards of the L.A. Green Building

Emissions Source	Estimated Project Generated CO <sub>2</sub> e Emissions (Metric Tons per Year)		
	Proposed Project		
Area	7.83		
Energy	1,167.48		
Mobile (Motor Vehicles)	809.44		
Stationary	18.34		
Waste	26.26		
Water	296.67		
Construction Emissions <sup>c</sup>	44.93		
Proposed Project Total:	2,370.95		
Less Existing Project Site:	424.09		
Proposed Project Net Total:	1,946.86		
SCAQMD's Interim Threshold of	3,000		
Significant Impact? [Yes/No]	No		
Notes: <sup>a</sup> The total construction GHG emissions were operation of the Project as per SCAQMD gu <sup>b</sup> As stated above, SCAQMD has yet to form land use development projects (e.g., reside GHG Significance Threshold Working G significance thresholds. Calculation data and results provided in A Worksheets.	e amortized over 30 years and added to the uidance. nally adopt a GHG significance threshold for ntial/commercial projects) and has formed a Group to further evaluate potential GHG Appendix E, Greenhouse Gas Emissions		

Table 6.11Proposed Project Operational Greenhouse Gas Emissions

Code.<sup>56</sup> The percent reduction calculated above is not a quantitative threshold of significance, but shows the efficacy of the Proposed Project's infill and smart growth attributes (i.e., replacement of existing uses and location of high density housing and neighborhood serving retail uses in a high quality transit area) and its compliance with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32.

#### Consistency with SB 375 and SB 32

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required

<sup>&</sup>lt;sup>56</sup> This estimate is based on comparing the Proposed Project's with mitigation scenario in the CalEEMod Worksheets to the pre-mitigation scenario. The mitigation scenario accounts for certain measures that are required by existing regulations such as SCAQMD Rule 403 for fugitive dust suppression, and various energy and water conservation features mandated by the Los Angeles Green Building Code (i.e., going beyond Title 24 energy conservation measures, installing water conservation plumbing fixtures, and instituting on-site recycling and citywide solid waste reduction programs.)

to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Proposed Project's consistency with the SCS and Scoping Plan is provided further below in Table 6.12, Consistency with Applicable SB 32 Scoping Plan Measures.

Scoping Plan Measures	Consistency
<b>Energy Efficiency.</b> Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	<b>Consistent</b> . The Proposed Project would be consistent with the Scoping Plan's policy to (a) maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms, and (b) to pursue comparable investment in energy efficiency from all retail providers of electricity in California. The Proposed Project would be designed and constructed to meet LA Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low flow plumbing fixtures, and installing ENERGY Star-rated appliances.
<b>Renewables Portfolio Standard.</b> Achieve 33 percent renewable energy mix statewide.	<b>Consistent</b> . The Proposed Project would not impede the Scoping Plan's policy to achieve 33 percent renewable energy mix statewide. While this policy is not directly applicable to the Proposed Project, the Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use of renewable energy that exceed 33 percent.
<b>Green Building Strategy.</b> Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	<b>Consistent</b> . The Proposed Project would be consistent with the Scoping Plan's policy to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The Proposed Project would be designed and constructed to meet L.A. Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low flow plumbing fixtures, and installing ENERGY STAR-rated appliances.
<b>Recycling and Waste.</b> Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	<b>Consistent</b> . The Proposed Project is consistent with the Scoping Plan's policy to reduce methane emissions at landfills, increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling, and to move toward zero waste. The Proposed Project would result in a less than significant impact on landfill capacity. (See response to Section 6.19(d), below). It would meet the City's 70 percent waste diversion rate goal and comply with the City's Zero Waste Plan, which will reduce solid waste, increase recycling, and manage trash in the City through the year 2030.

Table 6.12Consistency with Applicable SB 32 Scoping Plan Measures

<i>Water</i> . Continue efficiency programs and use cleaner energy sources to move and treat water.	<ul> <li>Consistent. The Proposed Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use. As part of its application for a water supply assessment (WSA) from the LADWP, the Applicant has committed to implement the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project:</li> <li>High Efficiency Toilets with flush volume of 1.0 gallons of water per flush</li> <li>Energy Star Certified Clothes Washers (Residential) – water factor of 3.2 and capacity of 4.5 cu-ft, front loading</li> <li>Showerheads with flow rate of 1.5 gallons per minute or less</li> <li>Drought Tolerant Plants – 70% of total landscaping</li> <li>Domestic Water Heating System located close proximity to point(s) of use</li> <li>Individual Metering and billing for water use for every residential dwelling unit and commercial unit</li> <li>Drip/Subsurface Irrigation (Micro-Irrigation)</li> <li>Proper Hydro-zoning (groups plants with similar water requirements together) Zoned Irrigation</li> </ul>		
	as feasible, pending final determination.		
Measures not listed are not applicable to this Project.			
Source: Parker Environmental Consultants, 201	9.		

#### Consistency with 2016 RTP/SCS

The Proposed Project is consistent with the following key GHG reduction strategies in SCAG's 2016 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Provide compact growth in areas accessible to transit;
- Provide jobs and housing closer to transit;
- Focus new housing and job growth in High Quality Transit Areas (HQTA); and
- Provide biking and walking infrastructure to improve active transportation • options, transit access.

The Proposed Project represents an infill development within an existing urbanized area that would concentrate new residential uses within a HQTA. The 2016-2040 RTP/SCS defines a HQTA 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 frequency during peak commute hours. Based on a walkability assessment of the project area by WalkScore.com, the Project Site is rated with a score of 83 of 100 possible points and defined as "very walkable – most errands can be accomplished on foot." In addition, the Proposed Project will provide bicycle storage areas for Project residents and guests. Walkscore.com also allocates a transit score of 67 to the Project Site, described as "good transit – many nearby public transportation options," and a bike score of 61 to the Project Site, described as "bikeable." The Proposed Project will provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2016 RTP/SCS.

See also Section 6.2 of this SCEA for a comprehensive analysis of the Proposed Project's consistency with SCAG's 2016 RTP/SCS.

#### Consistency with L.A. Green Building Code

The L.A. Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the L.A. Green Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission (CEC), meet 50 percent construction waste recycling levels, provide on-site storage for short- and long-term bicycle parking areas, and provide Energy-Star rated appliances were applicable. The Proposed Project will comply with these mandatory measures and, therefore, be consistent with the L.A. Green Building Code.

As demonstrated above, the Proposed Project's design features and compliance with regulatory measures are consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the LA Green Building Code, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

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

**Less Than Significant Impact.** A significant impact occurs where the Proposed Project conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing

the emissions of GHGs. As discussed in detail above, the Proposed Project is consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the L.A. Green Building Code, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030. Therefore, the Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

#### Cumulative Impacts

Less Than Significant Impact. An individual project's GHG emissions typically would be relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that 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 regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented in this Section analyzes whether the Proposed Project would be cumulatively considerable using a plan-based approach (supported by quantitative and qualitative analysis) to determine the Proposed Project's contributing effect on climate change.

Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is speculative to identify the specific impact, if any, to global climate change from one project's incremental increase in GHG emissions. The Proposed Project's GHG and the resulting level of significance are appropriately assessed in terms of the cumulative impact on global GHG emissions on climate change. Accordingly, a quantitative analysis of the GHG emissions anticipated to result from construction and operational activities was calculated as part of the cumulative impact analysis. As part of that analysis, the Proposed Project's GHG emissions were analyzed on a project-specific basis with respect to its impacts on global climate change.

As shown in the analysis above, the Proposed Project is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32, SB 375, the 2016-2040 RTP/SCS, and the LA Green Building Code that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.

### 6.9 Hazards and Hazardous Materials

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would	the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
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?				
C.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
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 create a significant hazard to the public or the environment?				
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			$\boxtimes$	
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				
<b>T</b> 1-				maation for	

The following section summarizes and incorporates the reference information from the following reports (contained in Appendix F to this SCEA):

F.1: <u>Phase I Environmental Site Assessment, 316 N. Juanita Avenue, Los Angeles,</u> <u>California</u>, prepared by EBI Consulting, dated July 26, 2018.

- F.2: <u>Phase II Environmental Site Assessment, 316 N. Juanita Avenue, Los Angeles,</u> <u>California</u>, prepared by EBI Consulting, dated December 26, 2019.
- F.3: <u>Phase I Environmental Site Assessment, 3812-3838 Oakwood Avenue, Los Angeles, Los Angeles County, California 90004, prepared by AEI Consultants, dated March 11, 2019.</u>

## a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**Less Than Significant Impact.** A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project includes the construction of five eight-story multi-family residential buildings with 247,812 square feet of floor area including 11,772 square feet of supportive services. During the operation of the Proposed Project, only modest amounts of hazardous materials typically associated with residential land uses—cleaning supplies, paints, and solvents— would be found at the Project Site. The acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements.

Construction could involve the use of potentially hazardous materials, including paints, solvents, vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and 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, 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 and impacts would be less than significant.

# 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?

**Less Than Significant Impact.** A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard.

The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) 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; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The following analysis summarizes the findings and conclusions of the site-specific Phase I and Phase II ESAs for 316 Juanita Avenue and a Phase I ESA for 3812-3838 Oakwood Avenue that are provided in their entirety in Appendix F to this SCEA.

#### <u>316 Juanita Avenue Phase I ESA (Appendix F.1)</u>

On July 23, 2018, EBI Consulting staff conducted a site reconnaissance of the subject property. Materials observed at the Project Site included petroleum hydrocarbon automotive fluids, miscellaneous automotive fluids, and miscellaneous flammable materials. Stains, spills, or evidence of a release were generally not noted in the areas observed except for minor staining. EBI also identified one approximately 185 gallon aboveground storage tank (AST). No significant releases or concerns were visually identified.

#### Records Review

Information from standard federal, state, county, and city environmental record sources was provided by Environmental Data Resources (EDR). As concluded in the Phase I ESA, the subject property is identified on the following database listings:

- *RCRA Hazardous Waste Generators:* The subject property was identified (Pacific Bell, 316 Juanita Avenue) with a regulatory status of containing a small quantity generator in 1990. No violations have been reported.
- California Water Resources Control Board (WRCB) Leaking Underground Storage Tanks (LUST): The subject property and 27 sites were identified on the LUST database with 0.5 mile of the subject property. The Phase I ESA concluded that the subject property and all 28 sites are unlikely to represent an environmental concern.
- *State AST/UST Databases:* The subject property and adjacent sites were identified on the UST/AST databases, however, the Phase I ESA conclude that all sites listed do not represent a known environmental concern at this time.

- *Hazardous Waste and Substances Sites List (Cortese):* The subject property was identified on the Cortese database as a duplicate listing to the LUST database.
- Hazardous Waste Information System (HAZNET): The subject property was identified on the HAZNET database for the generation of regulated wastes from 1993 to 2016 with over 177 manifest entries reported that included the following waste types: oil/water separator sludge, liquids with halogenated compounds, aqueous solutions, unspecified solvent mixture, empty containers, offspec/aged/surplus organics, and unspecified organic mixture. This activity is consistent with automotive services and EBI's observations and does not indicate that a release has occurred.
- *Non-ASTM Databases:* The subject property (AT&T California, 316 Juanita Avenue) was identified on the Facility Index System (FINDS) due to the site's reporting to the State CERS system under the hazardous materials program. This is consistent with the site's vehicle maintenance activities and does not indicate that a release has occurred.

#### Findings

The Phase I ESA has identified no evidence of recognized environmental conditions (RECs) in connection with the subject property except for the following:

AT&T has been engaged in automotive service activities that include petroleum hydrocarbons and generate regulated wastes (used oil and other automotive fluids such as automatic transmission fluid and antifreeze) and has operated automotive lifts since at least 1975. These operations are suspect to have occurred on 316 Juanita Avenue prior to construction of the vehicle maintenance building that was constructed in 1975. AT&T also operates an in-ground oil/water separator and currently three aboveground hydraulic lifts. These lifts replaced underground hydraulic lifts in 2010 and a portion of the foundation was replaced at that time, per the Building Department record. No data regarding this activity was otherwise identified. The historic use of regulated materials, generation of regulated wastes, and presence of the in-ground automotive lifts and oil/water separator are considered to represent a recognized environmental condition (REC) to 316 Juanita Avenue.

In addition, the following historical recognized environmental conditions (HREC) and *de minimis* conditions and considerations outside the scope of ASTM Practice E 1527-13 were identified in connection with 316 Juanita Avenue.

Historic USTs and related LUST cases at 316 Juanita Avenue have been resolved. These are considered HRECs for 316 Juanita Avenue and no further action appears warranted.

EBI conducted a limited screening survey for the presence of asbestos containing materials (ACM) at 316 Juanita Avenue. EBI identified friable suspect ACM in the form of plaster and/or sheetrock and joint compound wall systems, ceiling tiles and ceiling panels and non-friable suspect ACM in the form of vinyl flooring, mastic and roofing materials. These materials were observed to be generally undamaged and in fair to good condition at the time of this assessment. Please note that this survey was limited to visual observations of accessible areas and that the scope of work for this assessment did not include the collection and laboratory analysis of bulk samples of undamaged suspect ACM. Additional suspect ACM may be present in inaccessible areas, including, but not limited to, roofs, pipe chases behind solid walls and ceilings, concealed floor coverings, the interior of machinery or equipment, or water and sewer systems.

#### 316 Juanita Avenue Phase II ESA (Appendix F.2)

The primary objective of the Phase II ESA was to evaluate potential impact to the subject property from the RECs identified in the Phase I ESA prepared by EBI (July 26, 2018), as discussed above. The investigation focused on: 1) interior locations in the approximate location of the three former underground hydraulic lifts; and 2) exterior locations near the oil/water separator (OWS) and former wash rack.

A total of five borings (B-1 through B-5) were advanced at 316 Juanita Avenue using a direct push rig operated by J&H Drilling Co., Inc. of Buena Park, California. The boring locations are shown in Figure 6.2, Boring Location Map. Laboratory soil analytical results and complete laboratory data sheets and chain-of-custody documentation are presented in Appendix F.2 to this SCEA. The results of the field screening, soil sampling, and groundwater sampling analyses are described below.

#### Field Screening

The vapor headspace of each soil sample was field-screened using a photoionization detector (PID). The PID provides a reading of total ionizable VOCs. A strong petroleum odor and possible staining was observed in the soil sample collected from a depth of 20-25 feet bgs in boring B-1 with a PID reading of 15.0 ppmV. A strong petroleum odor was observed in the soil sample collected from a depth of 25-28 feet bgs in boring B-5 with a PID reading of 35.1 ppmV. No other visual or olfactory evidence of contamination or elevated PID readings above background was observed in the other soil samples collected.



Source: EBI Consulting, Inc., December 26, 2018.



Figure 6.2 Boring Location Map

#### Soil Sampling and Analysis

Selected "grab" soil samples (of approximate 6" intervals) from the borings were collected in laboratory provided sample containers. Each sample was labeled/logged onto a chainof-custody form, and placed in a cooler with ice for preservation in accordance with current Federal EPA SW-846 (3<sup>rd</sup> ed.). The samples were submitted to an independent qualified laboratory (SGS Laboratories) for analyses. The samples were analyzed for the target analytes volatile organic compounds (VOC) (via EPA method 8260), polycyclic aromatic hydrocarbons (PAHs) (via EPA method 8270), and total petroleum hydrocarbons (TPH) (via EPA method 8015), and polychlorinated biphenyls (PCBs) (via EPA Method 8082). The soil sample results of analysis revealed the following:

1) No PCBs were detected<sup>57</sup> at concentrations greater than the laboratory method detection limits in the samples submitted for those analyses.

2) No VOCs were detected in the soil samples collected from borings B-1 and B-2 except acetone, 2-butanone (MEK), methylene chloride, and toluene. None of the detected concentrations exceeded the corresponding DTSC-SLs for residential and commercial/industrial soil. It is noted that concentrations of acetone and toluene were detected in the associated laboratory method blank sample.

3) TPH-DRO and TPH-ORO were detected at concentrations greater than the laboratory method detection limits in each of the soil samples submitted for analysis. None of the detected concentrations exceeded the corresponding Tier 1 ESLs except those detected in the 7.5 to 10 foot sample collected from boring B-3.

4) The PAHs benzo(g,h,i)perylene and indeno(1,2,3-cd)pyrene were detected in the soil sample collected from boring B-2. None of the detected concentrations exceeded the corresponding DTSC-SLs for residential and commercial/industrial soil.

#### Groundwater Sampling and Analysis

The groundwater sample results of analysis revealed the following:

a) No PAHs or PCBs were detected at concentrations greater than the laboratory method detection limits in the samples submitted for those analyses.

<sup>&</sup>lt;sup>57</sup> "Detected" means that the analyte concentration exceeded the laboratory reporting limit.

- b) No VOCs were detected except m,p-xylenes and MTBE. None of the detected concentrations exceeded the corresponding regulatory screening values except MTBE in the sample collected from boring B-2.
- c) TPH-DRO and TPH-ORO were detected in each of the samples at concentrations that exceeded the corresponding Tier 1 ESLs for groundwater.

#### Conclusions

Based on the findings of this Phase II ESA, EBI concludes that significant subsurface impacts related to the historical uses of the OWS, former wash rack, and hydraulic lifts were not identified. The soil and groundwater results show that the contaminant concentrations (e.g., TPH-DRO, TPH-ORO, and MTBE) detected in the samples collected during EBI's 2018 Phase II ESA investigation are comparable to those collected by others during previous sampling events prior to 2009, for which the (Regional Water Quality Control Board (RWQCB) issued a 2009 No Further Action (NFA) determination .

#### 3812-3838 Oakwood Avenue (Appendix F.3)

On March 7, 2019, AEI Consultants staff conducted a site reconnaissance of the subject properties at 3812-3838 Oakwood Avenue. Materials observed at the Project Site included a storm drain and three-chambered clarifier system on the central portion of 3812-3814 1/2 Oakwood Avenue, adjacent to the Galindo Commissary food truck parking area. The clarifier was installed in 1995, and is used for occasional food truck rinsing. No evidence of wash detergents or chemicals was observed onsite. Reportedly, engine and undercarriage washing are not performed onsite. While some diluted concentrations of the petroleum products and hazardous materials used on site may be present in the waste streams discharged to the drain, they drain system is not expected to represent a significant environmental concern at this time. Cleaning supplies and detergents are stored on the ground floor of 3820-3838 Oakwood Avenue. All chemicals were packaged in consumer quantities. Based on the nature of these materials, the presence of cleaning supplies at the subject property is not expected to represent a significant environmental concern.

#### Records Review

AEI contracted Environmental Data Resources (EDR) to conduct a search of publicly available information from federal, state, tribal, and local databases containing known and suspected sites of environmental contamination and sites of potential environmental significance. As concluded in the Phase I ESA, 3812-3838 Oakwood Avenue is not identified on any of the database listings

#### Findings

The Phase I ESA identified no evidence of recognized environmental conditions (RECs), no Controlled Recognized Environmental Conditions (CREC), and no Historical Recognized Environmental Conditions (HREC) in connection with 3812-3838 Oakwood Avenue. AEI recommended no further investigation for 3812-3838 Oakwood Avenue property at this time.

In summary the Phase I ESAs concluded there is no evidence of recognized environmental conditions (RECs) in connection with 3812-3838 Oakwood Avenue except for prior automotive service activities that include petroleum hydrocarbons and generate regulated wastes (used oil and other automotive fluids such as automatic transmission fluid and antifreeze) and has operated automotive lifts since at least 1975. These operations are suspect to have occurred on 3812-3838 Oakwood Avenue prior to construction of the vehicle maintenance building that was constructed in 1975. AT&T also operates an in-ground oil/water separator and currently three aboveground hydraulic lifts. These lifts replaced underground hydraulic lifts in 2010 and a portion of the foundation was replaced at that time, per the Building Department record. No data regarding this activity was otherwise identified. The historic use of regulated materials, generation of regulated wastes, and presence of the in-ground automotive lifts and oil/water separator are considered to represent a recognized environmental condition (REC) to 3812-3838 Oakwood Avenue. Due to the age of structures on the Project Site, the presence of asbestos containing materials (ACM) and lead based paint (LBP) is also suspected in some of the roofing, flooring, wall and ceiling materials, caulking/putties, adhesives, spackling compounds, and insulation materials, as well as other building materials that may be used at 3812-3838 Oakwood Avenue.

Construction activities are subject to strict regulatory requirements for handling and treatment of potentially hazardous materials. Disturbance of any ACM material would be handled in accordance with applicable local and state regulations (which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529). LBP materials would be handled in accordance with CDPH regulations in residential or public buildings and HUD regulations and the U.S. EPA's Lead-Based Paint RRP. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead. Furthermore, all demolition related activities would be conducted in accordance with CCR Title 22, 66261-66265, Health and Safety Code 25189.5 and all additional pertinent environmental and Cal-OSHA regulations. The Proposed Project's compliance with mandatory state and federal regulatory compliance measures during site clearing, grading, and construction, potential impacts associated with the release of a hazardous material would reduce impacts to a less than significant level.

Thus, 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 would be less than significant.

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

**Less Than Significant Impact.** A project-related significant adverse effect may occur if the project site is located within 0.25-mile of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds.

There are five schools within one-quarter mile of the Project Site: Virgil Junior High School, Dr. Sammy Lee Elementary Medical and Health Science Magnet, Central City Value High School, Frank Del Olmo Elementary School, and Camino Nuevo High School. The Proposed Project has the potential to expose students and staff of the identified schools to potentially hazardous materials, substances, or waste during the construction period. Localized construction impacts associated with noise, dust and localized air quality emissions, and construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. As noted in Section 6.3, Air Quality, above, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable localized construction thresholds of significance for any sensitive receptor within 25 meters of the Project Site. The nearest school campus is the Virgil Junior High School, located approximately 320 feet (approximately 98 meters) to the south of the Project Site. As such, none of the schools within the area would be exposed to significant localized air quality impacts.

Based on the findings of the Phase I ESA, the historic use of regulated materials, generation of regulated wastes, and presence of the in-ground automotive lifts and oil/water separator are considered to represent a recognized environmental condition (REC) to the Project Site. Due to the age of structures on the Project Site, the presence of asbestos containing materials (ACM) and lead based paint (LBP) is also suspected. Compliance with existing laws and regulations would ensure potential impacts associated with these conditions are reduced to less than significant levels. SCAQMD Rule 1403 (Asbestos Emissions From Demolition/Renovation Activities), for example, requires that all materials that may be disturbed during a renovation or demolition project must be surveyed for the presence of asbestos and asbestos condition by a Certified Asbestos Consultant (CAC) or Certified Site Surveillance Technician (CSST) prior to any demolition or renovation activity. Construction activities are subject to strict regulatory requirements

for handling and treatment of potentially hazardous materials. Disturbance of any ACM material would be handled in accordance with applicable local and state regulations (which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529). LBP materials would be handled in accordance with CDPH regulations in residential or public buildings and HUD regulations and the U.S. EPA's Lead-Based Paint RRP. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead. Furthermore, all demolition related activities would be conducted in accordance with CCR Title 22, 66261-66265, Health and Safety Code 25189.5 and all additional pertinent environmental and Cal-OSHA regulations. As such, construction of the Proposed Project would not emit hazardous emissions within one-quarter mile of an existing school. Furthermore, the Proposed Project's proposed haul route would not pass by any of the identified schools, which would therefore minimize, to the greatest degree possible, hauling impacts to the aforementioned schools. As such, impacts related to nearby schools would be less than significant.

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?

Less Than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The Hazardous Waste and Substance Site List (also known as the Cortese List) is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information regarding the location of hazardous materials releases. Government Code Section 65962.5 requires the California Environmental Protection Agency to develop at least annually an updated Cortese List. The DTSC is responsible for preparing a portion of the information that comprises the Cortese List, and other state and local government agencies are required to provide additional hazardous material release information for the Cortese List. As noted in the Phase I ESA for 316 Juanita Avenue, 316 Juanita Avenue was identified on the Cortese ListA, the historic UST and LUST cases have been resolved. One UST removed in 1989 found some contamination in soil. However, subsequent investigation suggested the oil was naturally occurring in the rock and not from the UST. The agency concurred and case closure was issued in 1996. The second UST was removed in 1992 and soil sampling
results were Non-Detect (ND). A diesel UST was then installed. Two 12,000-gallon gasoline USTs and a waste oil UST were located further south at the current garage/maintenance building with the removal/reinstallation conducted in 1992. The waste oil UST was removed in 1990 and one soil sample showed ND. The most recent 12,000-gallon UST was removed in 2004 and contamination was found. This tank was the subject of the LUST case that was issued closure in 2009.

The Phase I ESA for 316 Juanita Avenue also identified 27 sites located within 0.5 mile of 316 Juanita Avenue that were identified on the Cortese List which are primarily duplicate listings to the LUST and Envirostor databases. The Phase I ESA concluded there is no evidence of recognized environmental conditions (RECs) in connection with the subject property except for prior automotive service activities that include petroleum hydrocarbons and generate regulated wastes (used oil and other automotive fluids such as automatic transmission fluid and antifreeze) and has operated automotive lifts since at least 1975. These operations are suspect to have occurred on 316 Juanita Avenue prior to construction of the vehicle maintenance building that was constructed in 1975. AT&T also operates an in-ground oil/water separator and currently three aboveground hydraulic lifts. These lifts replaced underground hydraulic lifts in 2010 and a portion of the foundation was replaced at that time, per the Building Department record. No data regarding this activity was otherwise identified. The historic use of regulated materials, generation of regulated wastes, and presence of the in-ground automotive lifts and oil/water separator are considered to represent a REC to 316 Juanita Avenue. Due to the age of structures on the Project Site, the presence of ACM and LBP is also suspected in some of the roofing, flooring, wall and ceiling materials, caulking/putties, adhesives, spackling compounds, and insulation materials, as well as other building materials that may be used at the Project Site.

As stated above, construction activities are subject to strict regulatory requirements for handling and treatment of potentially hazardous materials. Disturbance of any ACM material would be handled in accordance with applicable local and state regulations (which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529). LBP materials would be handled in accordance with CDPH regulations in residential or public buildings and HUD regulations and the U.S. EPA's Lead-Based Paint RRP. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead. Furthermore, all demolition related activities would be conducted in accordance with CCR Title 22, 66261-66265, Health and Safety Code 25189.5 and all additional pertinent environmental and Cal-OSHA regulations. The Proposed Project's compliance with mandatory state and federal regulatory compliance measures during site clearing, grading, and construction, potential impacts associated with the release of a hazardous material would reduce impacts to a less than significant level.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

**No Impact.** A significant project-related impact may occur if the Proposed Project were placed within a public airport land use plan area, or within two miles of a public airport and subject to a safety hazard. The closest public airport to the Project Site is Bob Hope Airport, located approximately 9 miles northwest of the Project Site, well outside of the two mile threshold. Furthermore, the Project Site is not in an airport hazard area. Based on the above, the Proposed Project would not have the potential to result in a safety hazard for people residing or working in the project area, and no impact would occur.

# f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. The determination of significance shall be made on a case-by-case basis considering 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. The Project Site is not located along a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.<sup>58</sup> Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.<sup>59</sup> Development of the Project Site may require temporary and intermittent partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would include a street vacation of Oakwood Avenue and of the northern portion of Madison Avenue between Oakwood Avenue and the main project entrance along Madison Avenue where the proposed turnaround is located. A firetruck turnaround would be constructed along Madison Avenue at this location. Furthermore, Oakwood Avenue functions as a local street to access the Project Site and S. Juanita Avenue and does not provide through access to Vermont Avenue. As such, the vacation would not interfere with an evacuation route for surrounding properties. Therefore, the Proposed Project

<sup>&</sup>lt;sup>58</sup> Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008.

<sup>&</sup>lt;sup>59</sup> City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.

would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and a less than significant impact would occur.

### g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

**No Impact.** The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).<sup>60</sup> Therefore, no impacts from wildland fires are expected to occur.

#### Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects identified in Section 3, Project Description, has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impact associated with the Proposed Project would be less than significant with adherence to all applicable federal and state regulations and regulatory compliance measures. Therefore, the Proposed Project would not be cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials and implementation of appropriate regulatory compliance measures, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

<sup>&</sup>lt;sup>60</sup> City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), website: http://zimas.lacity.org, accessed May 2019.

### 6.10 Hydrology and Water Quality

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would	the project:	•		•	
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
C.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	<ul> <li>Result in substantial erosion or siltation on- or off-site;</li> </ul>			$\boxtimes$	
	<ul> <li>Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</li> </ul>			$\boxtimes$	
	<li>iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or</li>			$\boxtimes$	
	iv. Impede or redirect flood flows?				$\boxtimes$
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			$\boxtimes$	
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater			$\square$	

### a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

management plan?

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include the NPDES permitting system, LAMC Article 4.4, and the low impact development requirements, which reduce potential water quality impacts during the construction and operation of a project.

#### **Construction Impacts**

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Prior to issuance of a grading permit, the Applicant will be required to obtain coverage under the SWRCB's NPDES Construction General Permit. The Applicant shall 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 required to be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall 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.

The SWPPP would incorporate the required implementation of BMPs for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Additionally, City of Los Angeles Ordinance No. 173,494 further sets procedures for stormwater pollution control for the planning and construction of development and redevelopment projects. As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

#### **Operational Impacts**

The Project Site is currently developed with three commercial buildings, three singlefamily residential buildings, and one surface parking lot. The Project Site is completely covered with impervious surfaces. Thus, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains located along Madison Avenue, Beverly Boulevard, Juanita Avenue, and Oakwood Avenue, and does not percolate into the groundwater table beneath the Project Site.<sup>61</sup> The Proposed Project would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions. The Proposed Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating the below stormwater pollution control measures that would regulate the amount and quality of stormwater leaving the Project Site.

The Proposed Project is required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project is also required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first <sup>3</sup>/<sub>4</sub>-inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event, whichever is greater.<sup>62</sup>

<sup>&</sup>lt;sup>61</sup> City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/ navigatela/, accessed August 2019.

<sup>&</sup>lt;sup>62</sup> City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.

The Proposed Project falls within the second tier of the LID Ordinance requirements. which state that development projects that involve non-residential uses or include five or more residential units and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Project Site shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). On-site stormwater management techniques must be designed so that no stormwater runoff leaving the Project Site for at least the volume of water produced by the Stormwater Quality Design Volume (SWQDv). Development and redevelopment projects are required to prepare a LID Plan, which complies with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is technically infeasible, the Project Site and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance. For the remaining runoff that cannot feasibly be managed on-site, the Proposed Project would be required to implement off-site mitigation on public and/or private land within the same sub-watershed as defined by the MS4 Permit.<sup>63</sup> Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.<sup>64</sup>

In compliance with the LID Plan, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing <sup>3</sup>/<sub>4</sub>-inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation

<sup>&</sup>lt;sup>63</sup> City of Los Angeles Ordinance No. 183,833, 2015.

<sup>&</sup>lt;sup>64</sup> Ibid.

Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Proposed Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.<sup>65</sup>

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, as the Proposed Project would be subject to the LID requirements and compliance procedures, operational water quality impacts would be less than significant with code compliance.

# b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

**Less Than Significant Impact.** A project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity. As discussed in Section 6.10(a), the Project Site is 100 percent impervious. As such, 100 percent of the surface water runoff from the Project Site is currently directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site.

According to the Geotechnical Report (Appendix D to this SCEA), water seepage was observed at depths ranging between 11.5 and 12.5 feet below the existing grade. The Geotechnical Report concluded that the seepage encountered does not represent the static groundwater level, but instead represents a perched condition of finite water in an impermeable zone. The historically highest groundwater level is not well defined for the Project Site, however, the closest contour is located about one mile northwest of the Project Site and corresponds to a depth of 20 feet below grade.<sup>66</sup> The Proposed Project does not propose any subterranean levels. Because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Additionally, adherence to Article 4.4 of the LAMC would ensure

<sup>&</sup>lt;sup>65</sup> City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.

<sup>&</sup>lt;sup>66</sup> Geotechnical Report (See Appendix D of this SCEA).

that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

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

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

Less Than Significant Impact. A project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow that would result in a substantial increase in erosion or siltation during construction or operation of the project. The Project Site is located in a highly urbanized area within the City of Los Angeles, and no streams or river courses are located on the Project vicinity, its currently fully developed and is largely impervious. Implementation of the Proposed Project would not increase site runoff or result in any changes in the local drainage patterns, since implementation of the LID Plan would reduce the amount of surface water runoff after storm events. As discussed above, the Applicant shall 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 in compliance with the requirements of the Construction General Permit and will identify construction Best Management Practices (BMPs) to control erosion and siltation during construction activities. For project operations, the Project Site would be 100 percent impervious and surface water runoff would be directed to existing storm drain infrastructure. Surface water runoff would be controlled through site design and engineering practices in accordance with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176) and the Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which would ensure the developed site does not contribute to substantial erosion or siltation off-site. As such, impacts to erosion or siltation would be less than significant. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.

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

**Less Than Significant Impact.** As stated above in Section 6.10(a) and (c)(i), the Project Site is 100 percent impervious. Surface water runoff under proposed conditions would comply with the City's LID Ordinance (Ordinance No. 181,899). Compliance with the LID

Ordinance would ensure the site is developed with BMPs designed to retain or treat the runoff from a storm event producing <sup>3</sup>/<sub>4</sub>-inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event (whichever is greater). As such, the volume of post-development surface water runoff would be reduced with the Proposed Project as compared to the existing conditions. Therefore, the Proposed Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site and impacts associated with the potential for off-site flooding would be less than significant.

#### iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if the Proposed Project would substantially increase the probability that polluted runoff would reach the storm drain system. As addressed above, the Project Site is completely developed with impervious surfaces and 100 percent of surface water runoff is directed to adjacent street storm drains. Existing storm drain lines serving the Project Site are located on Madison Avenue, Beverly Boulevard, Juanita Avenue, and Oakwood Avenue.<sup>67</sup> Following the development of the Proposed Project, runoff from the Project Site would be collected on the Project Site and directed towards existing storm drains in the Project vicinity that have adequate capacity. As discussed in Section 6.10(c)(iii), above, compliance with the City's LID Ordinance would ensure the volume of post-development surface water runoff is reduced under the Proposed Project as compared to the existing conditions. Compliance with the LID Ordinance would also ensure BMPs are implemented to treat the quality of surface water runoff before being discharged into the stormdrain system. Therefore, impacts to the stormwater drainage system would be less than significant.

#### iv. Impede or redirect flood flows?

**No Impact.** A significant impact may occur if the Project was located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area as mapped by the FEMA's Flood Insurance Rate Map. The Project Site is in a zone designated as Zone X, which signifies that the

<sup>&</sup>lt;sup>67</sup> City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed August 2019.

area is outside the 0.2% annual chance floodplain.<sup>68</sup> The Project Site is an infill site and is located in an urbanized area. As no changes to the local drainage pattern would occur with implementation of the Proposed Project, the Proposed Project would not have the potential to impede or redirect floodwater flows, and no impact would occur.

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

**Less Than Significant Impact.** The Geotechnical Investigation states that the Project Site does not lie within the mapped tsunami inundation boundaries. Therefore, the potential for tsunamis to adversely impact the Project Site is considered low. Per the County of Los Angeles Flood and Inundation Hazards Map (Leighton, 1990), the Project Site lies within mapped inundation boundaries due to a seiche or a breached upgradient reservoir.<sup>69</sup> The development of the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Thus, a less than significant impact would occur.

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

Less Than Significant Impact. As specified above, the Proposed Project would comply with LAMC Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control and would be required to obtain coverage under the NPDES General Construction Activity Permit. In addition, the Proposed Project would not adversely impact a groundwater management plan because the Proposed Project would be developed with Best Management Practices to reduce surface water runoff and would not otherwise impede groundwater replenishment in the basin. As discussed above, the Proposed Project would comply with the City's NPDES General Construction Activity Permit during construction and designed in conformance with the City's LID Ordinance for new development. Therefore, neither construction nor operation of the Proposed Project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

#### Cumulative Impacts

**Less Than Significant Impact.** Development of the Proposed Project in combination with the related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding area is served

<sup>&</sup>lt;sup>68</sup> Federal Emergency Management Agency (FEMA), Flood Map Service Center: Search by Address, Map Number 06037C1610F, September 26, 2008, website: https://msc.fema.gov/portal/, accessed May 2019.

<sup>&</sup>lt;sup>69</sup> Geotechnical Report (See Appendix D of this SCEA).

by the existing City storm drain system. Runoff from the development sites and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site or the related project sites, since this part of the City is already fully developed with impervious surfaces.

The Proposed Project and each related project would be required to implement a SWPPP and/or SUSMP. Under the requirements of the LID Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing <sup>3</sup>/<sub>4</sub> inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Proposed Project would not make a cumulative contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems and water quality would be less than significant.

### 6.11 Land Use and Planning



#### a) Physically divide an established community?

**No Impact.** A significant impact may occur if the Proposed Project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be

disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Project Site is located within an urbanized area of the Wilshire Community Plan Area and is consistent with the existing physical arrangement and land use pattern of the properties within the vicinity of the Project Site. As discussed in Section 3, Project Description, the Project Site is surrounded by a mix of residential (including permanent supportive housing), commercial, and light industrial/manufacturing uses. These land uses range in height from one- to nine-stories in height above grade. Properties surrounding the Project Site to the west, east and south are zoned M1-1 with a Limited Industrial land use designation. Other properties in proximity of the Project Site are zoned PF-1XL, R4-1, C2-1, and [Q]CM-1 with land use designations of Public Facilities -Freeway and Neighborhood Office Commercial.

The Proposed Project includes the demolition of three existing commercial buildings previously used for the commercial operation of a telecommunications company, three existing single-family residential buildings, one surface parking lot, and the removal of 4 non-protected trees. The Project includes the renovation of an existing 5,663 square-foot two-story office building above a one-level partially subterranean garage, and the construction, operation, and maintenance five eight-story multi-family buildings with 454 dwelling units, of which 449 are permanent supportive housing and five managers' units, and related social services. The Applicant is seeking a Zone Change to the CM (Commercial Manufacturing) Zone, which allows Qualified Permanent Supportive Housing Projects. The Project vicinity contains a mix of land uses including a permanent supportive housing development east of the Project Site, a residential rehabilitation center north of the Project Site, and several multi-family properties west of the Project Site. Therefore, the Project vicinity contains multi-family and affordable housing developments similar to the Proposed Project. Furthermore, the Proposed Project would be consistent with the PATH residential homeless site located to the east of the Project Site (across Madison Avenue) which are conditionally approved residential land uses within the M1-1 Zone. As such, no separation of uses or disruption of access between land uses types would occur as a result of the Proposed Project. The proposed vacation of Madison Avenue, Juanita Avenue and/or Oakwood Avenues would not separate, divide, or disrupt any surrounding land uses as there are no land uses north of Oakwood Avenue between Westmoreland Avenue and Juanita Avenue. The area along the northern side of Oakwood Avenue is improved with a sidewalk, a landscaped buffer and the Hollywood (101) Freeway. As such, neither the Proposed Project nor the proposed vacation would disrupt or divide the physical arrangement of the established community, and no impact would occur.

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?

**Less Than Significant Impact.** A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. At the regional level, the Project Site is located within the planning area of SCAG, the Southern California region's federally designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the SCAQMD.

At the local level, the Project Site is located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the project area. Namely, these plans and policy areas include the following: Wilshire Community Plan Area, the Wilshire/Koreatown Redevelopment Project Area, the Vermont/Western TOD Station Neighborhood Area Plan, the Los Angeles State Enterprise Zone. The Project Site is also within a Transit Priority Area (TPA) pursuant to SB 743 and noted in the City of Los Angeles' Zoning Information File No. 2452.<sup>70</sup> These documents guide development at the Project Site.

#### **Regional Plans**

#### SCAQMD Air Quality Management Plan

The Proposed Project is located within the South Coast Air Basin (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 most recent Air Quality Management Plan (AQMP) was updated in 2017 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 for ozone,  $PM_{10}$  and  $PM_{2.5}$ .

For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP.

<sup>&</sup>lt;sup>70</sup> City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: http://zimas.lacity.org/, accessed February 2019.

As discussed in Section 6.14(a), the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2016 RTP/SCS to increase housing density within close proximity to High Quality Transit Areas (HQTA). Thus, the Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP.

#### SCAG 2016 Regional Transportation Plan/Sustainable Communities Strategy

The Project Site is located within the six-county region that comprises the SCAG planning area. On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016 RTP/SCS). The 2016 RTP/SCS includes the long-term vision of how the SCAG region would address regional transportation and land use challenges and opportunities. The Proposed Project would be consistent with the goals and policies set forth in the 2016 RTP/SCS, as the Proposed Project would redevelop a site that is currently developed with three commercial buildings, three single-family residential buildings, and one surface parking lot, and would include the construction of five eight-story multi-family buildings. The Proposed Project would thereby increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Proposed Project would increase residential opportunities within a High-Quality Transit Area (HQTA). Furthermore, as the Proposed Project would add approximately 454 residential units to the community, generating a net increase of approximately 564 new residents,<sup>71</sup> the Proposed Project would be consistent with SCAG growth projections.

#### Local Plans

#### City of Los Angeles General Plan

The Proposed Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: 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.<sup>72</sup>

<sup>&</sup>lt;sup>71</sup> See Section 6.14 Population and Housing.

<sup>&</sup>lt;sup>72</sup> City of Los Angeles Department of City Planning, General Plan Elements, website: https://planning.lacity.org/GP\_elements.html, accessed March 2019.

The elements that would be most applicable to the Proposed Project are the Framework Element, Housing Element, Wilshire Community Plan (Land Use Element), Plan for a Healthy Los Angeles, and the Mobility Plan (Circulation Element). The Project Site is designated under the General Plan as Limited Industrial, and is located in the corresponding M1-1 Zone. The Proposed Project is requesting a General Plan Amendment to the Commercial Manufacturing land use designation, and a corresponding Zone Change to the CM-1 Zone. Residential units are not permitted in the M1 Zone unless an existing industrial building is being converted either by way of a conditional use permit process or under the Adaptive Reuse Ordinance. Subarea D allows uses of the CM Zone, except that Projects with hotel, motel, apartment hotel, and residential uses are prohibited. The Proposed Project will comply with all LAMC and City Charter provisions necessary to obtain the General Plan Amendment and Zone Change.

#### Framework Element

The General Plan's Framework Element provides citywide guidelines and a foundation upon which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The General Plan's Framework Element was adopted on December 11, 1996 and re-adopted on August 8, 2001. The Framework Element and the City's community plans discuss population, housing and employment to the year 2010. The Framework Element identifies a projected population of 4.3 million people living in 1,566,108 housing units. The Citywide General Plan Framework and the Wilshire Community Plan provide growth projections and CPA capacity, respectively, for the year 2010. The General Plan Framework Element provides a 2010 projection of 65,525 persons, 24,230 households, and 39,500 additional jobs. The General Plan Framework anticipated population, dwelling unit, and employment levels of 337,144 persons, 138,330 dwelling units, and 197,959 jobs, respectively, for the Wilshire Community Plan. The Wilshire Community Plan recognizes that the Community Plan Area (CPA) may grow that population, jobs, and housing could grow more quickly, or slowly, than anticipated depending on economic trends.

The Framework Element provides citywide guidelines and a foundation on which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The Proposed Project is in substantial conformity with the purposes, intent and provisions of the General Plan Framework Element, and the applicable Community Plan by providing a smart growth oriented, dense urban project where such growth is best accommodated based on its proximity to mass transit. A detailed consistency analysis with the Framework Element's goals, objectives, and policies relevant to the Proposed Project is provided in Appendix M to this SCEA. As provided in Appendix M, the Proposed Project is substantially consistent with the applicable policies of the General Plan Framework Element.

#### Housing Element

The Housing Element of the Los Angeles General Plan was adopted on December 3<sup>rd</sup>, 2013 and designed to ensure the City's evolving housing needs are met. Within the Housing Element, there are four goals that are used to accommodate future growth, preserve the unique collection of neighborhoods that characterizes Los Angeles, and ensure that all residents have access to a high quality of life. Those four goals are all relevant to the Proposed Project and are identified below:

- 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.
- A City which housing helps to create safe, livable and sustainable neighborhoods.
- A City where there are housing opportunities for all without discrimination.
- A City committed to ending and preventing homelessness.

The Proposed Project is consistent with all of the goals of the Housing Element by providing the community with a Permanent Supportive Housing for target population members. The Proposed Project provides the community with a greater diversity in type and cost of housing in order to make housing available to a larger range of income levels. These units, available to all individuals without discrimination, will provide housing options and support services. Further, the Proposed Project will contribute to the development of sustainable and walkable neighborhoods by encouraging pedestrian uses and utilization of transit options, all within walking distance of the Project Site. The Proposed Project's consistency with the applicable goals, objectives, policies, and programs of the Housing Element are provided in Appendix M to this SCEA. As provided in Appendix M, the Proposed Project is substantially consistent with the applicable policies of the Housing Element.

#### Wilshire Community Plan

The Project Site is located within the Wilshire Community Plan Area. Therefore, all development activity on-site is subject to the land use goals, objectives and policies of the Wilshire Community Plan (Community Plan). The Project Site has a General Plan land use designation of Limited Manufacturing. The Limited Manufacturing land use designation contains numerous policies designed to enhance industrial and commercial activity, it also contains many policies designed to stimulate the development of industrial and commercial uses within certain industrial zones. The Los Angeles Municipal Code does not allow for residential development within certain manufacturing zones. Therefore, the Proposed Project is requesting a General Plan Amendment to re-designate the site

to Commercial Manufacturing land use which would allow for the zone change to CM-1 which would allow the site to be developed as proposed.

The Proposed Project would revitalize the area with the development of both Permanent Supportive Housing and the necessary support services. The Proposed Project would provide a total of 247,812 square feet of residential space, including 11,772 square feet of service space (including 5,700 square feet of case management space and 6,072 square feet of indoor open space), and a total of 23 automobile parking spaces. A detailed analysis of the consistency of the Proposed Project with the applicable objectives and policies of the Wilshire Community Plan for Residential Land Uses is contained in Appendix M, General Plan Consistency Findings, to this SCEA. As shown in Appendix M, the proposed Project is substantially consistent with the applicable policies of the Wilshire Community Plan.

#### Vermont/Western Transit Oriented District Station Neighborhood Area Plan Specific Plan

The Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan (SNAP) consists of an area that includes all or parts of the Hollywood and Wilshire Communities and is generally bound by Franklin Avenue to the north; Virgil Avenue to the East; West 3<sup>rd</sup> Street to the South; and Canyon Drive to the West. The intent of the Specific Plan is to implement the goals and policies of the Hollywood Community Plan, Wilshire Community Plan, City General Plan Framework and Transportation Elements. To assist in implementation of goals and policies, the Specific Plan area is further divided into subareas grouped by land use elements. The Proposed Project is located within Subarea D. The Proposed Project is requiring a Specific Plan Amendment to change the site from Subarea D (Light Industrial/Commercial) to a newly created Subarea D.2 (Permanent Supportive Housing) with associated Development and Standards that would allow for a compatible design of a permanent supportive housing at this site. A detailed analysis of the consistency of the Proposed Project with the applicable policies of the Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan is provided in Appendix M, General Plan Consistency Findings. As shown in Appendix M, with approval of the requested discretionary entitlements including the proposed zone change and General Plan Amendment, the Proposed Project would be substantially consistent with the applicable policies of the SNAP.

#### Mobility Plan 2035 (Circulation Element)

The Mobility Plan 2035 ("Mobility Plan") of the City of Los Angeles General Plan, amendment adopted September 7, 2016, is designed to provide a policy foundation for the transportation system within the City of Los Angeles. There are five goals of the Mobility Plan that define the City's high-level mobility priorities and include: safety first; world class infrastructure; access for all Angelenos; collaboration, communication and informed choices; and clean environments and healthy communities. The Mobility Plan contains several objectives pertinent to the Proposed Project, which are identified as follows:

- Increase the number of adults and children who receive in-person active transportation safety education, in areas with the highest rates of collisions, by 10% annually;
- Ensure that 80% of street segments do not exceed targeted operating speeds by 2035;
- Ensure that 90% of households are have access within one mile to the Transit Enhanced Network by 2035;
- Ensure that 90% of all households have access within one-half mile to high quality bicycling facilities by 2035;
- Increase the combined mode split of persons who travel by walking, bicycling or transit to 50% by 2035.

With respect to the Mobility Plan's stated objectives, the Proposed Project would increase residential and social service uses within ½ mile to the Transit Enhanced Network and Bicycle Lane Network, therefore increasing the combined mode split of persons who travel by walking, bicycling, or transit. A detailed discussion of the Proposed Project's consistency with the Mobility Plan is provided in Appendix M to this SCEA. As shown in Appendix M, the Proposed Project would promote the goals of the Mobility Plan.

#### Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles (Plan) lays the foundation to create healthier communities for all residents of the City. As an Element of the General Plan, the Plan provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement.

With a focus on public health and safety, the Plan provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment, access to health services, affordable housing, healthy and sustainably produced food, and the opportunity to thrive.

The Plan accomplishes two policy objectives: it elevates existing health-oriented policies in the General Plan and, where policy gaps exist, creates new policies to reinforce the City's goal of creating healthy, vibrant communities. The Plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others, by reviewing the relevant policies in the General Plan and identifying where further policy direction is needed to achieve the goal of creating a healthy and sustainable City.

The Plan is underpinned by seven goals and identifies new policies and possible programs that serve as the implementation blueprint for creating healthier neighborhoods. Implementation of the Plan is addressed through programs, ordinances, and Community Plans, among other planning policy documents, which allow for the flexibility needed to address the specific needs of the City's diverse communities. References to neighborhoods usually reflect the Community Plan Area boundaries used by the Department of City Planning, but the City recognizes the fluidity and diversity of the City's neighborhoods. The Project's consistency with applicable goals in the Health and Wellness Element is presented in Appendix M, General Plan Consistency Findings, to this SCEA. As shown in Appendix M, the proposed Project is substantially consistent with the applicable policies of the Plan for a Healthy Los Angeles.

#### Wilshire Center / Koreatown Redevelopment Project Area

The Project Site is located within the Wilshire Center/Koreatown Redevelopment Project Area. The Wilshire Center/Koreatown Redevelopment Project Area, effective December 13, 1995, is valid until December 13, 2025.<sup>73</sup> As such, the Proposed Project would need to be reviewed for compliance with the Wilshire Center/Koreatown Redevelopment Project. Pursuant to City Ordinance 183,325 (effective 11/11/19), the authority or responsibility to perform actions and related land use functions regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section 11.5.14 and applicable provisions of the Code was transferred to the City. The purpose of the Redevelopment Plan is to implement the Community Plan's goals for the revitalization of the Wilshire Center/Koreatown neighborhood. A detailed analysis of the consistency of the Proposed Project with the applicable goals of the Redevelopment Plan

<sup>&</sup>lt;sup>73</sup> City of Los Angeles Community Redevelopment Agency – Los Angeles, Wilshire Center/Koreatown, website: http://www.crala.org/internet-site/Projects/Wilshire\_Center/workprogram.cfm, accessed March 2019.

is contained in Appendix M, General Plan Consistency Findings, to this SCEA. As shown in Appendix M, the proposed Project is substantially consistent with the applicable policies of the Wilshire Center/Koreatown Redevelopment Project.

#### Freeway Adjacent Advisory Notice (ZI-2427)

The Project Site is located approximately 500 feet south of the Hollywood Freeway (US-101). The City Planning Commission has taken an increased interest in projects that will place sensitive populations in close proximity to freeways. ZI-2427 serves as an advisory notice to the public and development applicants of the potential health risks associated with land uses that are within 1,000 feet of a freeway, as defined by the Caltrans Highway Design Manual. Areas within 1,000 feet of a freeway are known to experience the greatest concentrations of fine and ultrafine particulate matter (PM), with greatest concentrations within 500 feet. The Proposed Project includes 454 units of Permanent Supportive Housing and 11,772 square feet of support services. Future building occupants will be exposed to elevated levels of particulate matter from vehicles traveling on the nearby freeway and adjacent streets. While recent court rulings<sup>74</sup> have held that CEQA does not require an analysis of the impacts of the environment on a project, the South Coast Air Quality Management District and City Planning Commission continue to recommend that, prior to project approval, impacts of air pollutants on people who would live in a new development project are addressed and appropriately mitigated to the extent feasible. Providing enhanced filtration in building Heating, Ventilation, and Air Conditioning (HVAC) systems is an effective mitigation measure to improve indoor air guality. As stated in LAMC Section 99.05.504.5.3, mechanically ventilated buildings located within 1,000 feet of a freeway shall provide air filtration media for outside and return air that provides a Minimum Efficiency Reporting Value (MERV) of 13. The Proposed Project residential and service uses would be subject to the MERV standards of LAMC Section 99.05.504.5.3. As such, adherence to the LAMC and incorporation of project design features would ensure Project consistency with Freeway Advisory Notice (ZI-2427).

#### Enterprise Zone / Employment and Economic Incentive Program Area (EZ) (ZI-2347)

Designated by City Council resolution, and approved by the California Department of Commerce, Enterprise Zones receive Federal, State and City economic incentives to stimulate local investment and employment. This is accomplished through tax and regulation relief and improvement of public services. Enterprise Zones are entitled to special provisions with regards to certain design standards, including parking and height standards. These special provisions are elaborated upon below:

<sup>&</sup>lt;sup>74</sup> California Building Industry Association v. Bay Area Air Quality Management District (S213478, December 17, 2015).

Parking Standards: LAMC Section 12.21 A 4 (X)(3)

Except for the Downtown Business District parking area described in Section 12.21 A 4 (i), projects within Enterprise Zones may utilize a lower parking ratio for commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings thus increasing the buildable area of the parcel which is critical in older areas of the City where parcels are small.

Height: Section 12.21.4

Special height districts "EZ1", "EZ1-L", "EZ1-VL", "EZ1-XL", "EZ2", "EZ3", and "EZ4" were established for Enterprise Zones. Height District "EZ1" increases the total floor area contained in all the buildings on a lot to three times the buildable area. The height district suffix must be accomplished by a Zone Change.

The Proposed Project's residential use does not allow for utilization of a lower parking ratio in an Enterprise Zone. Further, the Proposed Project does not seek a Zone Change in order to utilize a special height district and increased Floor Area Ratio. Therefore, the Proposed Project is consistent with the Enterprise Zone Act Program.

#### Industrial Land Use Policy

The City's Industrial Land Use Policy (ILUP) project is a comprehensive study of the use of industrial-zoned land within the City of Los Angeles. As part of this effort, the January 3, 2008 Memorandum on Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses (ILUP Memo) underscores that the City's adopted policy is to retain industrial land for job producing uses. The ILUP Memo contains "Attachment A-ILUP Geographically Specific Directions" which includes the Hollywood Wilshire Industrial Area Directions map.

According to the ILUP Geographically Specific Directions Map, the Project Site is located within Analysis Area 1 of the Hollywood Wilshire Analysis Area, which is designated as an Employment Protection District (EMP). EMP Districts are defined as "[a]reas where industrial zoning should be maintained, i.e., where adopted General Plan, Community Plan and Redevelopment Plan industrial land use designations should continue to be implemented. Residential uses in these Districts are not appropriate."

In 2006, Analysis Area 1 was characterized as having 269 acres, 734 businesses and 8,374 jobs. Approximately 3.5 acres (1%) were comprised of Heavy Industry land uses, 218.6 acres (81 percent) were comprised of Light Industry land uses, 17 acres (6 percent) were comprised of Commercial land uses, 12 acres (4 percent) were comprised of Institutional land uses, 7.5 acres (3 percent were comprised of Residential land uses, 0.8

acres were comprised of Infrastructure land uses, and 9.7 (4 percent) was comprised of Miscellaneous land uses. The staff direction in the ILUP is to preserve industrial zoning consistent with the Hollywood Community Plan; allow industrial and ancillary commercial uses; and to encourage concentration of independent theaters along Santa Monica Boulevard between Lillian and Seward Avenues. The ILUP defines the Employment Protection District typology as "areas where industrial zoning should be maintained, and where adopted General Plan, Community Plan and Redevelopment Plan industrial land use designations should continue to be implemented. Residential uses in these Districts are not appropriate."

While neither the ILUP project nor the ILUP Memo took specific action to change any land use designations or zoning with respect to industrial land, nor was it adopted by the City Council, the ILUP Memo was intended in part to provide general long-term guidance to City staff during the updating of community plans and related rezoning considerations. As part of the general observations noted in the ILUP Survey Report for the Hollywood Area, the Project Site is located within Survey Area 2 (SA2), which is designated as "Industrial/Commercial" land in the Vermont/Western Transit Oriented District. SA2 contains a variety of light to heavy industrial uses as well commercial, institutional and residential uses. Surrounded by residential and transit-oriented commercial development, SA2 has wide streets, small blocks and narrow/irregular parcels. Industrial uses include a mortuary, auto-related, veterinary, pest control, adult uses, and a "polleria," among others. Additionally, SA2 is home to a charter school and an LAUSD school expansion, as well as PATH, a homeless services center.

The Survey Report for Hollywood notes that the survey area includes entertainmentrelated light industrial uses, and is surrounded by a significant amount of commercial and residential development with multiple transit options. Its major industrial use entertainment production and related industries - has been identified by the City of Los Angeles as an important growth industry. Subarea (SA2), the subarea in which the Project Site is located, contains a variety of light to heavy industrial uses as well commercial, institutional and residential uses. For SA2, small and irregular parcel configurations and the presence of two school sites (a charter school and an LAUSD school expansion) and housing are identified as issues that limit the potential for continued or expanded industrial use in the subarea. The Survey Report notes that land use regulations protecting areas adjacent to schools may threaten the operation of light and heavy industrial uses. The existing uses do not complement one another and create a sense of disorder. The residential, office and service uses on the north end are not compatible with the existing industrial uses.

The Survey Report for Hollywood concludes that the General Plan designates a large majority of the industrially zoned parcels in the Hollywood survey area as light industrial.

Two of the three sub areas selected in the Hollywood survey area [i.e., SA1 and SA3] contain entertainment-related uses that may warrant preservation. The Survey Report's concluding remarks for SA2 finds that the proximity to the 101 Freeway, existing zoning and separation from residential neighborhoods indicate that light to medium industrial uses appear to be appropriate in SA2. However, the Survey Report also indicates that regulations could be employed to ensure compatibility with schools and residential uses in the sub area.

With respect to the Project Site, it is important to note that the three existing residential dwellings that are located at 3812-3814 Oakwood were constructed in 1924 and 1939, respectively, and represent the original residential character of the area prior to the industrial land use designation. Thus, the Proposed Project's residential land uses would not introduce a new land use that does not already exist on the Project Site. Further, the existing land uses west of 3838 Oakwood (across Juanita Avenue) are zoned R4-1, designated for Commercial Office Neighborhood land uses and are improved with Restricted Affordable housing. The land uses to the immediate east (across Madison Avenue) include the PATH supportive housing project that has supported residential (homeless shelter) land uses at this location for over 15 years at this location. The PATH property is expanding to provide a total of 187 residential dwelling units in the M1-1 zone as authorized under a conditional use permit (CPC Case No. CPC-2014-1602-CU-SPE-SPP-DB-SPR-PA2). Thus Proposed Project's new residential development with permanent supportive housing is consistent with the pattern of development already occurring within the M1 Zone and Light Industrial land use designation immediately surrounding the Project Site. Within the block bounded by Juanita Avenue, Oakwood Avenue, Madison Avenue, and Beverly Boulevard, the only remaining land uses are two auto body shops and Dewey's Pest Control business, none of which involve heavy manufacturing land uses or light industrial operations. While these uses are permissible in the M1-1 zone they are also permitted in the CM zone. Thus, the introduction of new residential uses would not be incompatible with the existing remaining land uses on the block.

Moreover, the Proposed Project would be consistent with the Survey Report's suggestion to modify regulations to ensure compatibility with schools and residential uses in the subarea. The residential uses proposed would be compatible with those uses in a way that the current commercial uses are not.

In consideration of the information presented above, the Project would not result in a significant impact with respect to the City's policies regarding the use and preservation of industrial land use.

#### Residential Citywide Design Guidelines

The City of Los Angeles' City Planning Commission adopted the Citywide Design Guidelines on October 24, 2019. As part of the application for development, a requisite form for Project Submittal would be submitted to the Department of City Planning demonstrating that the Proposed Project would be in compliance with the Citywide Design Guidelines for a residential project and substantially consistent with the applicable design requirements for site planning, building orientation, entrances, relationship to adjacent buildings, building façade, building materials, sidewalks, on-street parking, off-street parking and driveways, on-site landscaping, open space and recreational activities, building signage, lighting and security, and utilities.

The Proposed Project promotes a pedestrian-friendly environment and incorporates landscaping along pedestrian rights-of-way along Oakwood Avenue, Juanita Avenue, and Madison Avenue. The Proposed Project would also include a lobby area, landscaped courtyards, and first-floor resident services which would support and promote pedestrian activity in the Project Site area. The Proposed Project incorporates a variety of architectural materials that complement each other; these architectural materials include: (metal railings, composite siding, vinyl clad windows and doors, standing seam siding, and fiber cement siding). The Proposed Project's design would complement the surrounding properties. Vehicle parking spaces and bicycle parking spaces would be provided interior to the Proposed Project within the first level. These design features would be executed in accordance with the Citywide Design Guidelines. Therefore, the Proposed Project complies with the Citywide Design Guidelines.

#### **Cumulative Impacts**

Less Than Significant Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, the Proposed Project's land use impacts would not be cumulatively considerable.

### 6.12 Mineral Resources

Would the project:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- b. Result in the loss of availability of a locallyimportant mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
			$\boxtimes$
			$\boxtimes$

### a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone (MRZ-2) Area or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance. The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area or an Oil Drilling/Surface Mining Supplemental Use District. However, the Project Site is located within the boundaries of the state-designated LA City Oil Field.<sup>75</sup> The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

<sup>&</sup>lt;sup>75</sup> City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, 1996.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

**No Impact.** A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area or an Oil Drilling/Surface Mining Supplemental Use District.<sup>76</sup> As discussed above, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

#### Cumulative Impacts

**No Impact.** As discussed above, the Proposed would have no impact on mineral resources. Because the Proposed Project would not result in any impacts related to mineral resources, the Proposed Project would not have the potential to contribute to any cumulative impacts on mineral resources.

### 6.13 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	_No Impact
Would the project result in:				
a. 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?				
b. Generation of excessive groundborne vibration or groundborne noise levels?			$\boxtimes$	

<sup>76</sup> City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles, September 1996.



#### Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel 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 to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" 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 from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon 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.

 $L_{\text{max}}$  – 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 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 60 dBA 24 hour  $L_{eq}$  would result in a measurement of 66.7 dBA CNEL.

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. Noise levels greater than 85 dBA 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 30-45 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, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

According to the World Health Organization (WHO), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to convert noise at 100 dBA, can also damage

hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, longterm high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.

Noise levels from a particular source generally decline as distance to the receptor increases. Sound from a small localized source (approximating a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates or drops off at a range of 6 dBA for each doubling of the distance. Other factors, such as the weather and reflecting or 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, 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. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures, such as hills, manmade features, buildings, and walls. Generally, for an at-grade facility in an average residential area where the first row of buildings cover at least 40 percent of total area, the reduction provided by the first row is reasonably assumed to be 3 dBA, with 1.5 dBA for each additional row. For buildings spaced tightly, the first row provides about 5 dBA of reduction, successive rows reduced noise by 1.5 dBA per row, with a maximum reduction limit of 10 dBA.<sup>77</sup> Additional noise attenuation can be provided within residential structures. Depending on the quality of the original building facade, especially windows and doors, sound insulation treatments can improve the noise reduction by 5 to 20 dBA.<sup>78</sup>

<sup>&</sup>lt;sup>77</sup> California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement, November 2009.

<sup>&</sup>lt;sup>78</sup> Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment, May 2006.

#### Ambient Noise Levels

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure 6.3, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations fronting the adjacent residential, institutional, and hotel uses as the most likely sensitive receptors to experience noise level increases during construction and at the major intersections surrounding the Project Site. The detailed noise monitoring data are presented in Appendix H, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table 6.13, Existing Ambient Noise Levels in Project Site Vicinity. As shown in Table 6.13, the ambient daytime noise in the vicinity of the Project Site ranges from 58.6 to 76.6 L<sub>eq</sub>. The maximum instantaneous noise level during the six 15-minute recordings was 102.2 dB L<sub>max</sub> at Location F, where a motorcycle passed by the noise monitor. The primary noise sources that contributed most to the measured ambient noise levels were pedestrians and vehicle traffic, including cars, buses, and motorcycles, as well as active construction in the vicinity of the Project Site.

No	Location	Primary Noisa Sourcas	Noise Level Statistics <sup>a</sup>		
NO.		Frinary Noise Sources	$L_{eq}$	L <sub>min</sub>	Lmax
А	Southeast corner of Madison Avenue and Cosmopolitan Street	Light pedestrian and moderate vehicle traffic	58.6	47.4	81.8
В	East side of Westmoreland Avenue, between Oakwood Avenue and Beverly Boulevard	Light pedestrian and vehicle traffic, ongoing construction for PATH Metro Villas	67.5	56.0	80.1
с	East side of Madison Avenue, between Oakwood Avenue and Beverly Boulevard	Moderate pedestrian and light vehicle traffic, ongoing construction for PATH Metro Villas	74.1	60.5	88.0
D	North side of Oakwood Avenue, between Juanita Avenue and Madison Avenue	Light pedestrian and moderate vehicle traffic, consistent traffic at the US- 101 south on-ramp	66.7	54.0	85.9
Е	West side of Juanita Avenue, between Oakwood Avenue and Beverly Boulevard	Light pedestrian and vehicle traffic	63.8	52.3	86.2
F	East side of Vermont Avenue, between Oakwood Avenue and Beverly Boulevard	Light pedestrian and heavy vehicle traffic	76.6	59.5	102.2
<ul> <li>Noise measurements were taken on June 13, 2019 between approximately 11:35 a.m. and 2:17 p.m. at each location for a duration of 15 minutes. See Appendix H of this SCEA for noise monitoring data sheets.</li> <li>Parker Environmental Consultants, 2019.</li> </ul>					

Table 6.13Existing Ambient Noise Levels in the Project Site Vicinity

#### Sensitive Receptors

The surrounding land uses in the Project Site vicinity are generally office, commercial, multi-family, and light manufacturing land uses, most of which are not considered sensitive to noise. Several noise sensitive land uses are located in the vicinity of the Proposed Project. For purposes of assessing noise impacts on sensitive populations, sensitive receptors in close proximity (within 500 feet) to the Project Site were identified. Table 6.14 below provides a summary of the sensitive receptors by address and land use and their respective proximity to the Project Site. The locations of these land uses relative to the Project Site are depicted in Figure 6.3, Noise Monitoring and Sensitive Receptor Location Map, above.

ID	Address	Land Use / Description	Distance to Project Site		
1	335 Juanita Avenue	Multifamily residential building (permanent supportive housing)	60 feet		
2	340 Madison Avenue	PATH multifamily residential building (permanent supportive housing) currently under construction	60 feet		
3	3755 Beverly Boulevard	Stanton University and Sharon's Church	65 feet		
4	400 Vermont Avenue	Delancey Street Foundation – multifamily residential building	115 feet		
5	305 Westmoreland Avenue	Multifamily residential buildings along Westmoreland Avenue, north of Beverly Boulevard	210 feet		
6	346 Vermont Avenue	Multifamily residential building on the east side of Vermont Avenue	250 feet		
7	320 Vermont Avenue	Hubbard College	270 feet		
8	152 Vermont Avenue	Virgil Middle School	320 feet		
9	249 Juanita Avenue	Multifamily residential building on the west side of Juanita Avenue	325 feet		
10	317-321 Vermont Avenue	Hotel buildings on the west side of Vermont Avenue	440 feet		
See Figure 6.3, Noise Monitoring and Sensitive Receptors. Source: Parker Environmental Consultants, 2019.					

 Table 6.14

 Summary of Noise Sensitive Land Uses within 500 Feet of the Project Site



Source: Google Earth, Aerial View, 2019.



Figure 6.3 Noise Monitoring and Sensitive Receptors

a) 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?

Less Than Significant Impact with Mitigation. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below. A significant impact may also occur if the Proposed Project were to result in a substantial temporary or periodic increase or a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project.

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source.<sup>79</sup> However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. A significant construction noise impact would also occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location, or if construction activities lasting more than ten days in a three-month period would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use.

For operational noise impacts, a project would normally have a substantial permanent increase in ambient noise levels from Proposed Project operations if the Proposed Project causes the ambient noise level measured at the property line of affected uses that are shown in Table 6.15, Community Noise Exposure Level (CNEL), to increase by 3 dBA in CNEL within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels

<sup>&</sup>lt;sup>79</sup> As shown in Figure 3.2, Zoning and General Plan Land Use Designations, the properties surrounding the Project Site are zoned for Limited Manufacturing (M1-1). Thus, LAMC Section 112.05 is not applicable to the Proposed Project. Notwithstanding the M1 zone designations, the Proposed Project's noise impacts upon adjacent residential and institutional land uses is addressed in this analysis in accordance with the LA CEQA Thresholds Guide.

Land Use	Normally Acceptable <sup>a</sup>	Conditionally Acceptable <sup>b</sup>	Normally Unacceptable <sup>c</sup>	Clearly Unacceptable <sup>d</sup>	
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		

Table 6.15Community Noise Exposure (CNEL)

<sup>a</sup> <u>Normally Acceptable</u>: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

<sup>b</sup> <u>Conditionally Acceptable</u>: 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.

<sup>c</sup> <u>Normally Unacceptable</u>: 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.

<sup>d</sup> <u>Clearly Unacceptable</u>: 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); City of Los Angeles, General Plan Noise Element, adopted February 1999.

associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double.<sup>80</sup> In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L<sub>eq</sub> standard of 5 dBA over ambient conditions as constituting a LAMC violation.

#### Construction Impacts

Construction of the Proposed Project would require the use of heavy equipment for demolition, site preparation, grading/excavation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of

<sup>&</sup>lt;sup>80</sup> FTA, Transit Noise and Vibration Impact Assessment, May 2006.

equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. The Proposed Project's construction noise levels were estimated using the noise prediction and reference noise levels for construction equipment usage by phase based on the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM, Version 1.1 (2006)) (See Appendix H to this SCEA). The average (hourly Leq) construction noise levels by phase are based on the quantity, type, and usage factors for the construction equipment anticipated to be used during each phase of construction. The predicted construction noise levels at each of the sensitive receptors were then estimated based on respective distance between the source and the receptor and other factors that would affect the noise levels such as intervening structures or barriers that provide sound attenuation. The estimated exterior construction noise levels at the 10 sensitive receptor locations are shown in Table 6.16, Estimated Exterior Construction Noise at Nearest Sensitive Receptors.

As shown in Table 6.16, the highest construction noise levels would occur to sensitive receptors 1 through 4, which are directly adjacent to the Project Site across Madison, Oakwood and Juanita Avenues. Construction noise levels at these locations prior to mitigation would range from 83.3 dBA Leg to 77.7 dBA Leg. Construction noise would exceed ambient noise levels at receptor 1 by up to 19.5 dBA Leq. At Sensitive Receptor Location 1 unmitigated construction noise levels are calculated to be 83.3 dBA. In comparison to the LAMC Section 112.05 construction noise limit of 75 dBA Leg, construction noise would need to be attenuated by 8.3 dBA to be in compliance with the Code. With respect to the L.A. CEQA Thresholds Guide threshold noise levels would need to be attenuated by 14.5 dBA L<sub>eg</sub> to ensure construction noise levels are reduced to less than significant levels. Accordingly, it is recommended that a temporary noise barrier be installed along the property line to block the line-of-sight between the noise sources and surrounding sensitive receptors, as required by Mitigation Measure N-4 (see below). The construction of a temporary <sup>3</sup>/<sub>4</sub> inch plywood noise barrier would be capable of attenuating the noise level by approximately 20 dBA, which is sufficient to meet the 14.5 dBA attenuation required at this Sensitive Receptor location. As such, construction noise impacts to Sensitive Receptor 1 would be less than significant after mitigation.
ID <sup>a</sup>	Address/Land Use <sup>a</sup>	Distance to Project Site (feet)	Existing Exterior Ambient Noise (dBA L <sub>eq</sub> )	Maximum Construction Noise Levels (dBA L <sub>eq</sub> ) <sup>b</sup>	Construction Noise Significance Criteria (dBA L <sub>eq</sub> ) <sup>b</sup>	Noise Impact Above 75- dBA Threshold (dBA L <sub>eq</sub> )	Noise Level Impact Above Ambient (dBA L <sub>eq</sub> )	
1	335 Juanita Avenue / Multifamily Residential	60	63.8	83.3	75.0	8.3	19.5	
2	340 Madison Avenue / Multifamily Residential	60	74.1	83.3	75.0	8.3	9.2	
3	3755 Beverly Boulevard / Institutional	65	63.8	82.6	75.0	7.6	18.8	
4	400 Vermont Avenue / Multifamily Residential	115	66.7	77.7	75.0	2.7	11.0	
5	305 Westmoreland Avenue / Multifamily Residential	210	67.5	63.3	75.0	0.0	-4.2	
6	346 Vermont Avenue / Multifamily Residential	250	76.6	60.9	75.0	0.0	-15.7	
7	320 Vermont Avenue / Institutional	270	76.6	70.3	75.0	0.0	-6.3	
8	152 Vermont Avenue / Institutional	320	58.6	58.8	75.0	0.0	0.2	
9	249 Juanita Avenue / Multifamily Residential	325	63.8	68.7	75.0	0.0	4.9	
10	317-321 Vermont Avenue / Hotel Buildings	440	76.6	56.0	75.0	0.0	-20.6	

# Table 6.16Estimated Exterior Construction Noise at NearestSensitive Receptors Without Mitigation

Notes

<sup>a</sup> See Figure 6.3, Noise Monitoring and Sensitive Receptor Location Map.

<sup>2</sup> Sensitive Receptor No. 5, 6, 8, and 10 incorporates a 10-dB attenuation factor due to buildings separating the Project Site and sensitive receptors.

Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.

At Sensitive Receptor Location 2 unmitigated construction noise levels are calculated to be 83.3 dBA. Construction noise would need to be attenuated by 8.3 dBA to be in compliance with the Code. With respect to the L.A. CEQA Thresholds Guide threshold noise levels would need to be attenuated by 4.2 dBA  $L_{eq}$  to ensure construction noise levels are reduced to less than significant levels. Implementation of Mitigation Measure N-4 would provide up to a 20 dBA reduction in construction noise, which is more than sufficient to meet the attenuation required at this Sensitive Receptor location to be in compliance with the LAMC and not exceed the construction noise thresholds of

significance. As such, construction noise impacts to Sensitive Receptor 2 would be less than significant after mitigation.

At Sensitive Receptor Location 3 unmitigated construction noise levels are calculated to be 82.6 dBA. Construction noise would need to be attenuated by 7.6 dBA to be in compliance with the Code. With respect to the L.A. CEQA Thresholds Guide threshold noise levels would need to be attenuated by 13.8 dBA L<sub>eq</sub> to ensure construction noise levels are reduced to less than significant levels. Implementation of Mitigation Measure N-4 would ensure construction noise is in compliance with the LAMC and would not exceed noise thresholds of significance. As such, construction noise impacts to Sensitive Receptor 3 would be less than significant after mitigation.

At Sensitive Receptor Location 4 unmitigated construction noise levels are calculated to be 77.7 dBA. Construction noise would need to be attenuated by 2.7 dBA to be in compliance with the Code. With respect to the L.A. CEQA Thresholds Guide threshold noise levels would need to be attenuated by 6 dBA  $L_{eq}$  to ensure construction noise levels are reduced to less than significant levels. Implementation of Mitigation Measure N-4 would ensure construction noise is in compliance with the LAMC and would not exceed the noise significance thresholds. As such, construction noise impacts to Sensitive Receptor 4 would be less than significant after mitigation.

Due to their respective distances and intervening structures blocking the line of sight of the noise source to the receptor, construction noise levels at Receptor Locations 5 through 10 would be below 75 dBA limit of LAMC Section 112.05 and would be at or below ambient noise levels. As such none of these Receptor Locations would be significantly impacted by the Proposed Project.

In accordance with the provisions set forth in LAMC 112.05, implementation of Mitigation Measures N-1 through N-5 are recommended to ensure impacts associated with construction-related noise levels are mitigated to less than significant levels. A summary of the noise levels after mitigation is provided in Table 6.17, Construction Noise Levels After Mitigation. As shown in Table 6.17, with implementation of these measures, temporary construction-related noise impacts would be considered less than significant and in accordance with City requirements and standards.

#### Mitigation Measures:

#### Increased Noise Levels (Demolition, Grading, and Construction Activities)

**N-1** Construction and demolition shall 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.

- **N-2** The project contractor(s) shall employ noise minimization strategies when using mechanized construction equipment. To the maximum extent practical, demolition and construction activities shall be scheduled and coordinated so as to avoid operating several pieces of equipment simultaneously, which cause high noise levels. Construction equipment shall not idle when not in use. The contractor shall place noise construction equipment as far from the Project Site edges as practicable.
- **N-3** The project contractor shall use power construction equipment with noise shielding and muffling devices to the extent available and feasible. The noise mufflers shall be consistent with manufacturers' standards and be equipped with all construction equipment, fixed or mobile.
- N-4 The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier shall include <sup>3</sup>/<sub>4</sub> inch plywood or other sound absorbing material capable of achieving a 14.5 dBA reduction in sound level.
- N-5 An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Table 6.17
Estimated Exterior Construction Noise
at Nearest Sensitive Receptors After Mitigation

ID <sup>a</sup>	Address/Land Use <sup>a</sup>	Existing Exterior Ambient Noise (dBA L <sub>eq</sub> )	Maximum Construction Noise Levels Before Mitigation (dBA L <sub>eq</sub> ) <sup>b</sup>	Mitigation Attenuation Factor (dBA)	Construction Noise Level After Mitigation (dBA L <sub>eq</sub> ) <sup>b</sup>	Significant Impact After Mitigation? (Yes/No)
1	335 N. Juanita Avenue / Multifamily Residential	63.8	83.3	-20	63.3	No
2	340 N. Madison Avenue / Multifamily Residential	74.1	83.3	-20	63.3	No
3	3755 Beverly Boulevard / Institutional	63.8	82.6	-20	62.6	No
4	400 N. Vermont Avenue / Multifamily Residential	66.7	77.7	-20	57.7	No
5	305 N. Westmoreland Avenue / Multifamily Residential	67.5	63.3	NA	63.3	No
6	346 N. Vermont Avenue / Multifamily Residential	76.6	60.9	NA	60.9	No
7	320 N. Vermont Avenue / Institutional	76.6	70.3	NA	70.3	No
8	152 N. Vermont Avenue / Institutional	58.6	58.8	NA	58.8	No
9	249 N. Juanita Avenue / Multifamily Residential	63.8	68.7	-20	48.7	No
10	317-321 N. Vermont Avenue / Hotel Buildings	76.6	56.0	NA	56.0	No

Notes

<sup>a</sup> See Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.

<sup>b</sup> Sensitive Receptor No. 5, 6, 8, and 10 incorporates a 10-dB attenuation factor due to buildings separating the Project Site and sensitive receptors.

Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.

#### **Operational Noise**

#### HVAC Equipment Noise

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing buildings on the Project Site and in the Project vicinity. As such, the HVAC equipment associated with the Proposed Project would not represent a new source of noise in the Project Site vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, 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 estimated A-weighted noise ratings published for standard HVAC equipment,<sup>81</sup> sound power from rooftop mounted HVAC equipment would be expected to range from 69 dBA Leg to 74 dBA Leg at the source. Therefore, as a conservative estimate, a reference level of 74 dBA Leq was utilized to analyze HVAC equipment noise levels. Based on the respective distances to the sensitive receptors the maximum noise level produced by the HVAC equipment, the highest anticipated noise level is approximately 60.3 dBA Leq, which occurs at Sensitive Receptor No. 1 and 2. As this noise level is significantly below the ambient noise level, the sound of HVAC equipment would not be audible at the neighboring sensitive receptors. As such, noise from mechanical equipment would be less than significant.

#### Off-Site Traffic Noise

The Proposed Project would increase traffic volumes on the surrounding roadways, which in turn has the potential to increase roadway noise. Based on the principles of roadway noise, it would take a doubling of the roadway's traffic to generate a perceptible increase (3 dBA) in the ambient roadway noise volume. If a project would result in traffic that is less than double the existing traffic, then the Proposed Project's mobile noise impacts can be assumed to be less than significant. According to the Proposed Project's Transportation Study, the proposed development would result in a net increase of 407 net daily vehicle trips, including 49 AM peak hour trips and 37 PM peak hour trips. For purposes of analyzing the Proposed Project's traffic noise impacts, the traffic volumes at the two adjacent intersections analyzed in the Proposed Project's Transportation Study, Vermont Avenue & Beverly Boulevard and Beverly Boulevard & Temple Street &

<sup>&</sup>lt;sup>81</sup> Carrier Corporation, Product Data Sheet for 25HBC5 Base 15 Heat Pump with Puron Refrigerant (1 ½ to 5 Nominal Tons.

Westmoreland were analyzed. The Proposed Project's estimated 407 average daily trips would represent a small percent increase in the daily traffic volume at these intersections. Therefore, the Proposed Project would not double the traffic along the closest intersections and thus would not exceed the 3-dBA CNEL threshold of significance at the nearby study intersections and roadways. Thus, the Proposed Project's mobile source noise impact would be less than significant.

# b) Generation of, excessive groundborne vibration or groundborne noise levels?

**Less Than Significant Impact.** Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby 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 level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

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 most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the 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. 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.

#### Construction

Excavation and earthwork activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities

associated with the Proposed Project could have an adverse impact on sensitive structures (i.e., building damage).

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as neither the City of Los Angeles nor the County of Los Angeles have an adopted significance threshold to assess vibration impacts during construction, the FTA and Caltrans adopted vibration standards for buildings which are referenced to evaluate potential impacts related to project construction. This analysis uses the FTA adopted vibration standards for buildings. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table 6.18, below.

Threshold Criteria	PPV (in/sec)	Approximate RMS velocity in decibels (VdB) (re 1 micro-inch/second)		
Building Category				
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102		
II. Engineered concrete and masonry (no plaster)	0.3	98		
III. Non-engineered timber and masonry buildings	0.2	94		
IV. Buildings extremely susceptible to vibration damage	0.12	90		
Source: Federal Transit Administration, Office of Planning and Environment Federal Transit Administration, Transit Noise and Vibration Impact Assessment (Table 12-3) May 2006.				

Table 6.18Construction Vibration Damage Criteria

Table 6.19, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table 6.19, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Equipment	Approximate PPV (in/sec)				Approximate RMS (VdB)					
Equipment	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.										

Table 6.19Vibration Source Levels for Construction Equipment

#### **Structural Vibration Impacts**

There are three buildings immediately adjacent to the Project Site's property lines. As such, the Proposed Project's construction activities would have the potential to create groundborne vibration impacts to the surrounding structures. As shown in Table 6.20, below, the estimated vibration level at the nearest buildings located 10 feet from the Project Site is 0.21 PPV in/sec, which is well below the threshold of 0.3 PPV in/sec. As such, the Proposed Project's construction activities would have no groundborne vibration impact to any surrounding structures.

No.	Sensitive Land Use	Distance from Project Site (ft)	Estimated Vibration Levels (PPV in/sec)	Threshold of Significance	Significant Impact?			
1	340 Juanita Avenue (Commercial building west of the Project Site	<10 ft	0.21	0.3	No			
2	3737 Beverly Boulevard (Commercial building south of the Project Site)	<10 ft	0.21	0.3	No			
3	3701 Beverly Boulevard Commercial building south of the Project Site	<10 ft	0.21	0.3	No			
Sourc	Source: Source: Federal Transit Administration. Office of Planning and Environment Federal Transit							
Admiı	Administration. Transit Noise and Vibration Impact Assessment (Table 12-3) May 2006.							
Parke	r Environmental Consultants, 20	19.	·	· ·				

Table 6.20Estimated Structural Vibration Damage Levels at Nearest Structures

#### Operation

The Proposed Project is a residential development and would not involve the use of stationary equipment that would result in high vibration levels. 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) along Juanita Avenue, Oakwood Avenue, and Madison Avenue, the proposed land uses would not result in a substantial increase in the use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, the collection of refuse would occur within the enclosed first-floor levels which would effectively attenuate groundborne vibration and noise impacts. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.

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?

**No Impact.** A significant impact may occur if the Proposed Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. There are no airports or private air strips within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. The Proposed Project would not expose people to excessive noise levels associated with airport uses. Therefore, no impact would occur.

#### Cumulative Impacts

Less Than Significant Impact with Mitigation. Development of the Proposed Project in conjunction with the related projects identified in Section 3, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The closest related project is Related Project No. 20 (PATH II Affordable Housing project), which is located east of the Project Site, across Madison Avenue. The PATH II Affordable Housing project is currently under construction and is anticipated to be completed with construction activities by the time the Proposed Project begins construction. As such, construction noise impacts to occur. As such, the cumulative construction noise impacts with mitigation.

### 6.14 Population and Housing

Would the project:

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

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
		$\boxtimes$	
		$\boxtimes$	

a) 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)?

**Less Than Significant Impact.** A significant impact may occur if the Proposed Project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. The determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a 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; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

#### SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On April 7, 2016, SCAG's Regional Council adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016 RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016 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 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons and approximately 1,325,500 residences in 2012. By the year 2040, SCAG forecasts that the City of Los Angeles will increase to 4,609,400 persons (or a 20% increase since the year 2012) and approximately 1,690,300 residences (or a 28% increase since the year 2012). As shown in Table 6.21, below, SCAG population and housing projections from 2012 through 2040 envisions a population growth of 763,900 additional persons (an approximate 20% growth rate) in the City of Los Angeles and 3,816,000 additional persons (an approximate 21% growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 364,800 households, or approximately 28% between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26% between 2012 and 2040. The number of employment opportunities is anticipated to increase by 472,700 jobs (approximately 28%) in the City of Los Angeles between 2012 and 2040, and the SCAG Region is anticipated to increase by 2,432,000 jobs (approximately 33%) between 2012 and 2040.

Population						
Region	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%			
	Househo	lds				
Region	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%			
	Employm	ent				
Region	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, adopted 2016 Appendix, adopted April 2016.	RTP/SCS Growth Fore	ecast, Demographics ar	nd Growth Forecast			

Table 6.21SCAG Population and Housing Projections for theCity of Los Angeles, Los Angeles County, and the SCAG Region

#### **Construction Impacts**

Construction job opportunities created as a result of the Proposed Project are not expected to result in any substantial population growth in the project area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process.

Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Proposed Project, and as such, significant housing or population impacts would not result from construction of the Proposed Project. Therefore, construction-related population growth impacts would be less than significant.

#### **Operational Impacts**

The Project Site is currently developed with three commercial buildings used for the commercial operation of a telecommunications company, three existing single-family residential buildings, and one surface parking lot. The Proposed Project would include the demolition of the existing structures on-site; the renovation of an existing two-story commercial office building, and the construction, operation, and maintenance of five eight-story multi-family buildings with 454 dwelling units, of which 449 are permanent supportive housing and five managers' units, and related social services. The Proposed Project's population generation is shown in Table 6.22. The construction of 454 additional dwelling units with would result in an increase in up to approximately 564 net permanent residents in the City of Los Angeles.<sup>82</sup> The proposed increase in housing units and population would be consistent with the SCAG forecast of additional households and persons in the City of Los Angeles between 2012 and 2040.

<sup>&</sup>lt;sup>82</sup> Based on the U.S. Census Bureau, American Community Survey (ACS) PUMS database, the City of Los Angeles' 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).

Land Use	Quantity	Occupancy Rates	Total Population				
Project							
Apartments	370 1-Bedroom Units	1 per room	370				
	71 2-Bedroom Units	2 per room	142				
	13 4-Bedrooom Units	4 per room	52				
	Total Increase in Population 564						
Note: DU = dwell <sup>[a]</sup> This estimate i Source: Flexible I	Note: DU = dwelling unit <sup>[a]</sup> This estimate is based on the planned occupancy of the Proposed Project. Source: Flexible PSH Solutions, 2020.						

Table 6.22Project Estimated Population Generation

With respect to employment growth, the additional employees generated by the Proposed Project would contribute to a fraction of one percent of SCAG's employment growth forecast for the City of Los Angeles. Thus, the increase in employment opportunities as a result of the Proposed Project is within SCAG's employment growth forecast. It can be assumed that most of the employees generated by the Proposed Project would already reside within the City of Los Angeles or County of Los Angeles. Thus, any population growth generated by the Proposed Project would be well within SCAG's population growth projections.

#### Localized Growth Forecasts

Table 6.21 shows the Southern California Association of Government's (SCAG) population and housing growth for the City of Los Angeles to the year 2040. The Proposed Project's 454 new units and estimated 564 future residents would be well within SCAG estimates of growth for the City between 2012 and 2040. Therefore, the Proposed Project would result in a less than significant impact with respect to population, housing, and employment growth. Additionally, the Proposed Project would not 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 Proposed Project occupancy/buildout or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. Therefore, impacts related to any substantial unplanned population growth would be less than significant.

## b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

**Less Than Significant Impact.** A significant impact may occur if the Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Proposed Project would consist of the development of five eight-story multi-family buildings with 454 dwelling units, on a site that is currently occupied by three commercial buildings, three single-family residential buildings (3 units, all of which are currently occupied), and one paved surface parking lot. All tenants will be receive relocation payments pursuant to applicable law and replacement units will be constructed on-site.

The Proposed Project would result in a net increase of 451 units. As such, the Proposed Project would provide additional housing within the community for the underserved target population. Additinally, the displacement of the existing residential units would be temporary as the Proposed Project would provide a net increase in housing. Relocation assistance for the existing tenants would be provided in accordance with all applicable laws and regulations and as specified in the LAMC. The Proposed Project would be consistent with the Wilshire Community Plan, the Vermont/Western SNAP, and the Wilshire Center/Koreatown Redevelopment Plan Area by providing a 100 percent affordable housing development. The proposed residential uses would be consistent with the allowable uses as permitted by the zoning and General Plan land use designations. Therefore, a less than significant impact would occur.

#### Cumulative Impacts

**Less Than Significant Impact.** The related projects would introduce additional residential related uses to the Project Site area. Any residential related projects would result in direct population growth in the Project Site area.

As discussed in Section6.14(a), the Proposed Project would not exceed the growth projections of SCAG's 2016-2040 RTP/SCS for the City of Los Angeles subregion. Because population growth potentially associated with the Proposed Project has already been anticipated per SCAG projections, the Proposed Project's population growth would not be cumulatively considerable. Related projects would also be reviewed for consistency with regional growth projections. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

## 6.15 Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. F	ire protection?			$\boxtimes$	
b. P	olice protection?			$\boxtimes$	
c. S	chools?			$\boxtimes$	
d. P	arks?			$\boxtimes$	
e. C	other public facilities?			$\boxtimes$	

#### a) Fire protection?

**Less Than Significant Impact.** A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service would only be considered significant if such activities result in a physical adverse impact upon the environment.<sup>83</sup>

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 57.507.3.3, Table 507.3.3, of the 2017 City of Los Angeles Fire Code, the maximum response

<sup>&</sup>lt;sup>83</sup> City of Hayward et al. v. Board of Trustees of the California State University (2015).

distance between high density residential and commercial land uses and a LAFD fire station that houses an engine company or truck company is 1.5 miles with a required fire flow of 4,000 gpm. If either of these performance criteria were exceeded, all structures located in the applicable commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

#### Construction

Construction of the Proposed Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of best management practices (BMPs) for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Proposed Project. The BMPs that would be implemented during construction of the Proposed Project would include: keeping mechanical equipment in good operating condition, and as required by law, carefully storing 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, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site and surrounding vicinity during construction through marked emergency access points approved by the LAFD, construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flagmen would be used to facilitate the traffic flow until construction is complete. Construction activities of the Proposed Project would result in a less than significant impact to fire services.

#### Operation

A project would result in a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility, the construction of which results in a significant impact upon the environment. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.507.3.3, the maximum response distance between commercial land uses and a LAFD fire station that houses an engine company, or a truck company is one

mile or 1.5 miles, respectively. If the distance is exceeded, all structures located in the applicable commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Proposed Project is located beyond the maximum response distance. Although the Proposed Project is within the adequate response distance, the Proposed Project would install a fire sprinkler system to ensure safety from any fire hazards that may occur within the building.

The Proposed Project would include up to 454 dwelling units and 11,772 square feet of ground floor support services and would generate approximately 564 new residents.<sup>84</sup> The Proposed Project would increase the utilization of the Project Site, which is currently occupied by three commercial buildings, three single-family residential buildings, and one surface parking lot, and would potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 6, located at 326 N. Virgil Avenue, approximately 0.2 mile northeast (driving distance) of the Project Site. See Figure 6.4, Public Services in the Project Vicinity. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 6 to the Project Site, fire protection response would be considered adequate. The Proposed Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. As part of the normal building permit process, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that any impacts upon fire services created by the Proposed Project would be less than significant.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e., Beverly Boulevard, Juanita Avenue, Oakwood Avenue and Madison Avenue). All circulation improvements proposed would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation. Therefore, impacts related to emergency access would be less than significant.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life

<sup>&</sup>lt;sup>84</sup> See Section 6.14, Population and Housing.



#### LEGEND

(F)

P

(#)

- LAFD Station No. 6
- Rampart Division Police Station

#### Schools

- 1. Dr. Sammy Lee Elementary Medical Health Science Magnet
- 2. Thomas Starr King Middle School Magnet: Film and Media
- 3. John Marshall Senior High School

#### Parks

- (#) 1. Madison West Park 2. Bellevue Recreation Center 3. Shatto Recreation Center 4. Occidental Parkway 5. Lemon Grove Recreation Center 6. Lafayette Multipurpose Community Center 7. Lafayette Skate Park 8. Lake Street Community Center 9. Lake Street Park 10. Lake Street Skate Park 11. MacArthur Park 12. MacArthur Park Recreation Center 13. MacArthur Park Lake 14. Burns (Robert L.) Park 15. La Mirada Park 16. Silverlake Recreation Center 17. Seoul International Park 18. Unidad Park 19. Barnsdall Art Park 20. Barnsdall Art Park Museum 21. Echo Park Cafe Concession 22. Echo Park Lake 23. Echo Park Pedal Boats Concession 24. Silverlake Dog Park 25. Seily Rodriguez Park 26. Echo Park Recreation Center 27. Hope and Peace Park 28. Sunnynook River Park (off-map) 29. Patton Street Park 30. Echo Deep Indoor Pool (#) Libraries 1. Felipe de Neve Branch Library 2. Cahuenga Branch Library
  - 3. Wilshire Branch Library
  - 4. Edendale Branch Library

#### Source: Yahoo Maps, 2019.



hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in lowdensity residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. According to the LAFD, minimum fire flow requirement for the Proposed Project is 6,000 to 9,000 gallons per minute (gpm) from six adjacent hydrants flowing simultaneously. A Service Advisory Request/Fire Service Pressure Flow Report (SAR) would be prepared and approved for the Proposed Project by the Department of Water and Power (LADWP) to ensure that fire flow requirements are considered adequate for the Project Site. With approval from LADWP, development of the Proposed Project would result in a less than significant impact to fire flow requirements. The adequacy of existing water pressure and availability in the project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that that fire protection services are adequate within the proposed building and around the Project Site. Operation of the Proposed Project would not result in the increased demand for additional LAFD facilities and, therefore, result in a less than significant impact to fire protection services.

#### b) Police protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station that would result in a physical adverse impact upon the environment. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new police station or police substation, if warranted, would only be considered significant if such activities result in a physical adverse impact upon the environment. In other words, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services alone are not an environmental impact that CEQA requires a project applicant to mitigate.<sup>85</sup>

The Project Site is currently served by the City of Los Angeles Police Department's (LAPD) Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas. The Rampart Division Police Station, located at 1401 W. 6<sup>th</sup> Street, approximately 2.3 miles southeast (driving distance) from the Project Site. The Rampart Community Police Station area is approximately 5.54 square miles and includes the communities of Angelino Heights, Echo Park, Historic Filipinotown, Korea Town, Lafayette Park, MacArthur Park, Pico-Union, Temple-Beaudry, Virgil Village, and Westlake. The service boundaries for Central Area are as follows: Stadium Way, Pasadena Freeway (SR-110) to the north, Washington Boulevard, 7<sup>th</sup> Street to the south, Los Angeles River to the east, and the Harbor Freeway (I-110) to the west.

#### Construction

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would 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. As part of the standard condition of approval issued by the Department of Building and Safety, the Applicant is required to ensure the site is secure and does not pose a nuisance to pedestrians or adjacent property owners during construction. Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. The Applicant will also provide on-site security personnel to secure the site on a 24-hour a day basis during construction. As such, with adherence to regulations and project conditions, Proposed Project impacts would be less than significant during the construction period.

#### Operation

Development of the Proposed Project would result in an increase of residents, employees, visitors, and patrons to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site over the current conditions. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Applicant will provide an on-site security personnel to operate 24 hours a day, seven days a week.

<sup>&</sup>lt;sup>85</sup> City of Hayward et al. v. Board of Trustees of th88e California State University (2015).

Upon completion of the Proposed Project, the Applicant would also provide the Rampart Area Commanding Officer with a diagram of each portion of the Proposed Project. The diagram should include access routes and any additional information that might facilitate police response. The Proposed Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and nonvisible presence of people at all times of the day would provide a sense of security during evening and early morning hours. As such, the Proposed Project residents and employees would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls to the LAPD. With incorporation of the security design features identified in the LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", which will be confirmed through the Site Plan Review process, the Proposed Project's potential impact upon LAPD services would be reduced to a less than significant level.

#### c) Schools?

**Less Than Significant Impact.** A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project Site is located in LAUSD Board District 2 and Board District 5. The Project Site is currently served by one elementary school, one middle school, and one high school. Table 6.23, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

Resident Schools Serving the Project Site						
School Name	Grades	Address				
Dr. Sammy Lee Elementary Medical Health Science Magnet	K-5	3600 Council Street				
Thomas Starr King Middle School Magnet: Film and Media	6-8	4201 Fountain Avenue				
John Marshall Senior High School	9-12	3939 Tracey Street				
Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed August 2019. Parker Environmental Consultants, 2019						

Table 6.23Resident Schools Serving the Project Site

As shown in Table 6.24, Proposed Project Estimated Student Generation, the Proposed Project would generate approximately 103 elementary students, 28 middle school students and 59 high school students, for a total of approximately 190 students. Based on correspondence from the LAUSD, no new school construction is planned within the

project's service area. Both the Dr. Sammy Lee Elementary Medical Health Science Magnet School and the Thomas Starr King Middle School Magnet: Film and Media School are currently operating near or above capacity and are projected to have overcrowding conditions in the near future. As such, the Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of all applicable School Development Fee, the Proposed Project's potential impact upon public school services would be less than significant.

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students	
Existing Uses (to be removed)						
Single-family	3 du	1	0	0	1	
Total Exist	1	0	0	1		
Proposed Project						
Multi-Family <sup>a</sup>	454 du	104	28	59	191	
Total Estimat	ted Students:	104	28	59	191	
	Less Existing:	1	0	0	1	
Net Studen	103	28	59	190		
Notes: sf = square feet; du = dwelling	g units; emp = em	ployees	il	. 0 0060 alama		

 Table 6.24

 Proposed Project Estimated Student Generation

Student generation rates are as follows for multi-family and single-family residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students per unit.

Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.

#### d) Parks?

**Less Than Significant Impact.** A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the proposed project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range

standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. These standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities."

The Project Site is located within a highly urbanized area of the Wilshire community and, as shown in Table 6.25, Recreation and Park Facilities within the Project Area, has access to approximately 123 acres of parkland and public recreation facilities within a two-mile radius. As summarized in Table 6.25 below, these facilities range in size from a 0.29-acre pocket park to the 31-acre MacArthur Park. The Proposed Project would provide approximately 36,580 square feet (0.84-acres) of total common open space and amenities on-site available exclusively to serve Project residents and guests. The Proposed Project includes a variety of on-site amenities including, but not limited to, a second level amenity deck and terraces, thereby achieving the required square feet of open space required by the LAMC. Given the Project Site's proximity to an abundance of parks and recreational facilities and its provision of on-site open space, the Proposed Project's increased demands upon public parkland and recreation facilities would be reduced to less than significant levels.

#### e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. The determination of whether the Proposed Project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Proposed 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, addition or relocation) 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 or direct financial support to the Los Angeles Public Library).

Park Name	Size (acres)	Park Amenities	Approx. Distance from Project Site (miles)
1. Madison West Park	0.5	Open space (lawns), and children's play area	0.21
2. Bellevue Recreation Center	9.33	Auditorium, barbecue pits, baseball diamond, basketball courts, children's play area, indoor gym, picnic tables, jogging path, kitchen, multipurpose sports field, and stage	0.63
3. Shatto Recreation Center	5.43	Auditorium, baseball diamond, basketball courts, children's play area, community room, tennis courts, jogging path, kitchen, multipurpose sports field, outdoor fitness equipment, and stage	0.68
4. Occidental Parkway	3.14	Open space	0.74
5. Lemon Grove Recreation Center	5.15	Auditorium, barbecue pits, baseball diamond, basketball courts, children's play area, picnic tables, batting cages, jogging path, kitchen, outdoor fitness equipment, stage, and TV area	1.03
6. Lafayette Multipurpose Community Center	8.46	Auditorium, basketball courts, children's play area, community room, picnic tables, soccer field, tennis courts, jogging path, kitchen, and synthetic field	1.10
7. Lafayette Skate Park	0.77	Skate park	1.10
8. Lake Street Community Center	2.05	Basketball courts, children's play area, community room, indoor gym, small grass area, and skate park	1.25
9. Lake Street Park	1.02	Basketball courts, children's play area, community room, indoor gym, volleyball courts, skate plaza, and grass area	1.27
10. Lake Street Skate Park	0.81	Children's skateboarding classes	1.27
11. MacArthur Park	19.6	Baseball diamond, children's play area, picnic tables, lake	1.35
12. MacArthur Park Recreation Center	3.6	Children's play area, picnic tables, bandshell, kitchen, outdoor fitness equipment, synthetic field, multipurpose room	1.35
13. MacArthur Park Lake	7.8	Barbecue pits, children's play area, pedal boats, picnic tables, synthetic field, walking paths, fishing	1.48
14. Burns (Robert L.) Park	1.65	Children's play area, picnic tables	1.49
15. La Mirada Park	0.16	Outdoor fitness equipment, picnic tables	1.54
16. Silverlake Recreation Center	3.95	Children's play area, community room, indoor gym, picnic tables, multipurpose sports field	1.69
17. Seoul International Park	3.38	Auditorium, baseball diamond, children's play area, picnic tables, basketball courts, community room, outdoor fitness equipment, waking path, outdoor fitness area	1.70
18. Unidad Park	0.29	Open space (lawns), and children's play area	1.72
19. Barnsdall Art Park	10.52	Open space	1.72
20. Barnsdall Art Park Museum	1.28	Exhibitions, performances, school outreach, special events, tours, visual and performing arts programs	1.72
21. Echo Park Café Concession	0.16	Concession stand	1.74

Table 6.25Recreation and Park Facilities within the Project Area

22. Echo Park Lake	24.53	Fishing, pedal boats, picnic tables, and walking paths	1.74		
23. Echo Park Pedal Boats Concession	0.11	Pedal boat rentals	1.74		
24. Silverlake Dog Park	verlake Dog Park 1.26 Open space, picnic tables, dog park		1.76		
25. Seily Rodriguez Park	Seily Rodriguez Park 0.28 Basketball courts, children's play area, picnic tables, benches		1.77		
26. Echo Park Recreation Center	1.61	Barbecue pits, baseball diamond, basketball courts, children's play area, community room, soccer field, tennis courts, stage, picnic tables, indoor gym, season pool	1.79		
27. Hope and Peace Park	. Hope and Peace Park 0.53 Basketball courts, benches, open space		1.79		
28. Sunnynook River Park 3.76 Walking path, benches, picnic tables		Walking path, benches, picnic tables	1.83		
29. Patton Street Park	0.4	Children's play area, outdoor fitness equipment, walking path, benches	1.87		
30. Echo Deep Indoor Pool	1.92	Year-round pool, and open space	1.96		
Total Parkland (Approximate):	123.45				
Sources: Park distances, size, and amenities were determined using: (1) City of Los Angeles Department of Recreation and Parks, Facility Locator, http://www.laparks.org/; and (2) Navigate LA, http://navigatela.lacity.org/navigatela/, accessed May 2019. Parker Environmental Consultants, 2019.					

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branch currently serving the Project Site include:

- Felipe de Neve Branch Library, located at 2820 W. 6<sup>th</sup> Street, approximately 1 mile south of the Project Site;
- Cahuenga Branch Library, located at 4591 Santa Monica Boulevard, approximately 1.2 miles north of the Project Site;
- Wilshire Branch Library, located at 149 N. Saint Andrews Place, approximately 1.4 miles west of the Project Site.
- Edendale Branch Library, located at 2011 W. Sunset Boulevard, approximately 1.8 mile east of the Project Site.<sup>86</sup>

LAPL Criteria for New Libraries (formerly Site Selection Guidelines) recommended sizes for libraries are 12,500 square foot facilities for communities with less than a population of 45,000 and 14,500 square foot facilities for communities with a population of more than 45,000. At 500,000 square feet the Central Library, which serves the entire City, far

<sup>&</sup>lt;sup>86</sup> City of Los Angeles Public Library, Hours and Locations, website: http://www.lapl.org/branches, accessed August 2019.

exceeds these criteria and currently meets the library demands of the surrounding community.

#### Construction

Construction workers of the Proposed Project would not typically frequent libraries during work hours, but are more likely to use libraries near their homes during non-work hours. Therefore, potential impacts to library service and facilities would be less than significant during construction of the Proposed Project.

#### Operation

The Proposed Project would generate approximately 564 residents. The additional residents represent a negligible amount of the current service population of the Felipe de Neve Branch Library, Cahuenga Branch Library, Wilshire Branch Library, and Edendale Branch Library, and would be accommodated in the future service population of the Central Library, which serves the entire City. Furthermore, the LAPL does not have any current or proposed plans to construct additional libraries within the Project's service area. Therefore, potential impacts to library service and facilities by residents would be less than significant.

#### Cumulative Impacts

**Less Than Significant Impact.** Development of the residential related projects is projected to generate additional employment, housing, and resident population within the study area, which would likely generate additional demands upon fire protection services, police protection services, schools, parks, and library services. As part of the City's annual budget review process, the City assesses the needs for public services and allocates funds via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. The cumulative impacts upon each of the service providers is addressed below.

#### Fire

With respect to fire services, the Proposed Project, in combination with the related projects, could increase the demand for fire protection services in the LAFD service area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. To the extent cumulative development causes the need for additional fire stations to be built throughout the City,

the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, cumulative impacts upon LAFD services would be less than significant.

#### Police

With respect to police services, the Proposed Project, in combination with the related projects, would increase the demand for police protection services in the project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

#### Schools

With respect to cumulative impacts upon schools, the Proposed Project, in combination with related projects is expected to result in a cumulative increase in the demand for school services within the LAUSD service area. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. However, each of the new housing units would be responsible for paying mandatory school fees as applicable to mitigate the increased demand for school services. Cumulative impacts on schools would be less than significant.

#### Parks

With respect to cumulative impacts upon parks, development of the Proposed Project in conjunction with related projects could result in an increase in permanent residents residing in the surrounding area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with the LAMC which may include payment of Parks and Recreation Fees for market rate residential projects. Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Proposed Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

#### Libraries

Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population would result in a cumulative increase in demands upon public 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 Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. The LAPL is committed 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.<sup>87</sup> Moreover, the Central Library far exceeds the LAPL criteria for its service area. Thus, the additional population generated by the Proposed Project and the related projects would not make a cumulatively considerable impact upon the City's library system.

<sup>&</sup>lt;sup>87</sup> Los Angeles Public Library Strategic Plan 2015-2020, June 2015.

### 6.16 Recreation

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			$\boxtimes$	

a) Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

**Less Than Significant Impact.** For the purpose of this SCEA, a significant impact may occur if the project would include substantial employment or population growth, which would 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.

The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the proposed project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available, considering, 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).

The Proposed Project would generate approximately 564 residents and would provide a minimum of 36,580 square feet of open space areas, including a 28,644 square foot ground-floor outdoor courtyard and ground-floor community rooms located in each of the five residential buildings. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services.

Notwithstanding the availability of on-site recreational amenities and open space areas, it is reasonable to assume that the future occupants of the Proposed Project would utilize recreation and park facilities in the surrounding area. As noted in Table 6.25, above, there are 30 existing, new, and recently improved parks within an approximate 2-mile radius of the Project Site totaling approximately 123 acres that are available to serve the future residents, guests, and visitors to the Project Site. In addition, the Proposed Project would provide approximately 36,580 square feet (0.84 acres) of open space and recreational facilities on-site that would be available exclusively to serve Project residents and their guests. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services, and accordingly the Proposed Project would not substantially 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. Accordingly, the Proposed Project's impact upon parks and recreational facilities would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, there are 30 existing, new, or recently improved parks within an approximate 2-mile radius of the Project Site totaling approximately 123 acres that are available to serve the future residents, guests, and visitors to the Project Site. The Proposed Project would also provide approximately 36,580 square feet of open space and recreational facilities on-site. Citywide park standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities." The Proposed Project's increased demands upon recreational facilities would not in and of itself require or result in the construction of a new park, which might have an adverse physical effect on the environment. Thus, impacts to park and recreational facilities would be less than significant.

#### Cumulative Impacts

**Less Than Significant Impact.** The Proposed Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. A number of new parks and recently renovated park improvements have been made in the Wilshire area to accommodate cumulative

demands created by increased residential development. The related projects that include market-rate residential units would be required to pay park mitigation fees or applicable Quimby fees to mitigate impacts upon park and recreational facilities and to provide additional funds to meet Citywide park goals. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. Because the Proposed Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Proposed Project would have a less than significant cumulative impact on such resources.

## 6.17 Transportation/Traffic

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would	the project:				
a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			$\boxtimes$	
b.	Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			$\square$	
C.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			$\boxtimes$	
d.	Result in inadequate emergency access?			$\boxtimes$	

The City of Los Angeles has updated its travel demand model, impact evaluation methodology and transportation impact thresholds based on vehicle miles traveled (VMT). The City adopted the new CEQA thresholds and methodology for VMT, along with revised Transportation Assessment Guidelines (TAG) in July 2019. However, because this Project has a signed MOU and submitted its Affordable Housing Referral<sup>88</sup> application to the Department of City Planning (DCP) prior to the City's adoption date, and because the Transportation Study has already been in substantial progress, the Transportation Study utilizes the (previous) guidelines that were in effect when the study commenced. Accordingly, the following section summarizes the information provided in the Transportation Study, prepared by The Mobility Group, dated January 2020 for

<sup>&</sup>lt;sup>88</sup> Application submitted July 3, 2019 and its review fee was paid on July 11, 2019.

addressing threshold questions a, c, and d. The Transportation Study is provided in its entirety in Appendix I to this SCEA. With respect to Threshold Question b, this SCEA relies on the findings of the supplemental Enlightenment Plaza Project – VMT Analysis, dated February 5, 2020 contained in Appendix I.2. The City of Los Angeles Department of Transportation (LADOT) correspondence of approval (dated May 3, 2020, Re: DOT Case #CEN19-48497) is also provided in Appendix I to this SCEA.

# a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

**Less Than Significant Impact.** A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities. The following analysis of applicable programs, plans, or policies is based on the Transportation Study provided in Appendix I-1.

#### Driveway and Site Circulation

The main vehicular access (ingress and egress) is to be provided from Madison Avenue. A centralized drop-off and pickup will also be provided on Madison Avenue. Vehicular access will also be provided via driveways on Oakwood Avenue and Juanita Avenue to parking for those components of the Project. Project traffic will therefore use Madison Avenue, Juanita Avenue and Oakwood Avenue to access the Project.

All Project driveways will be designed according to LADOT standards, so there will be no significant impacts due to roadway design hazards.

It is anticipated that the vacated portions of Madison Avenue and Oakwood Avenue would not be available for general public use, and would be controlled by a control arm type device. Project residents and employees would pass through the vacated street section with use of key card or similar device to operate the control barrier. A similar option would be provided for the adjacent PATH project on the east side of Madison Avenue to Oakwood Avenue. The public would not however be able to use the vacated sections of Madison Avenue and Oakwood Avenue.

Access and circulation for the Proposed Project would there remain unchanged with the potential street vacations. Other than traffic from the Proposed Project and from the adjacent PATH project, traffic volumes currently using this segment of Madison Avenue are negligible, and as Juanita Avenue and Oakwood Avenue offer alternate access routes to Beverly Boulevard and Virgil Avenue, the street vacation is not expected to cause significant traffic impacts. Thus, no significant impacts due to roadway design hazards would occur under the proposed roadway vacations.

#### Congestion Management Program (CMP)

On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents. Therefore, no further analysis of the CMP is required.

#### Transit Impacts

The Project Site is well served by transit. The Metro Red Line subway rail station at Vermont Avenue and Beverly Boulevard is located one block from the Project site. It also located within walking distance of six bus routes – Metro 14, Metro 201, Metro 204, one Metro Rapid Route – Metro 754, as well as one LADOT Commuter Express line – CE422, and one LADOT DASH bus line – Wilshire Center/Koreatown. Additionally, there are 11 bus stops within three blocks of the Project Site. The following includes a summary of the transit lines service the project rea:

- Metro Red Line (Metro Rail) runs between Downtown Los Angeles and North Hollywood via Vermont Avenue in the vicinity of the Project. It operates between approximately 4:20 a.m. and 1:20 p.m. on weekdays and weekends. It runs at about 10 minute headways during weekday peak periods and around 15-20 minute headways on weekends.
- Metro 754 (Metro Bus Rapid Transit) runs between Athens and Hollywood via Vermont Avenue. It operates between approximately 5:10am and 9:25pm on weekdays and between 6:40 a.m. and 9 p.m. on weekends. It runs at about 10 minute headways during weekday peak periods and around 15-20 minute headways on weekends.
- Metro 14 runs between Beverly Hills and Downtown Los Angeles via Beverly. It operates between approximately 5:10 a.m. and 12:50 a.m. on weekdays and between 5:30 a.m. and 12:50 p.m. on weekends. It runs at about 10 minute headways during weekday peak periods and around 20 minute headways on weekends. It also operates Owl Schedule, between 1:50 a.m. and 4:50 p.m. Monday thru Sunday.
- Metro 201 runs between Glendale and Koreatown Athens and Hollywood via Vermont Avenue in the vicinity of the Project. It operates between approximately

5:45 a.m. and 8:40 p.m. on weekdays and between 7 a.m. and 9 p.m. on weekends. It runs at about 55 minute headways during weekday peak periods and around 60 minute headways on weekends.

- Metro 204 runs between Athens and Hollywood via Vermont Avenue. It operates between approximately 4:50 a.m. and 5 p.m. weekdays and between 5:40 a.m. and 5 p.m. on weekends. It runs at about 10 minute headways during weekday peak periods and around 20 minute headways on weekends.
- LADOT Commuter Express 422 runs between Hawthorne and Downtown Los Angeles via Highway 101 in the vicinity of the Project. It operates between approximately 5:25 a.m. and 8:30 a.m. and between 3:35 p.m. and 7:40 p.m. on weekends only. It runs at about 20 minute headways during weekday peak periods.
- LADOT DASH Wilshire Center/Koreatown has a bus stop located on Vermont Avenue at the 1<sup>st</sup> Street intersection. It operates between approximately 7:30am and 7:10Pm on weekdays and between 9:30 a.m. and 6:30 p.m. on weekends. It runs at about 20 minute headways during weekdays and weekends.

Additionally, it should be noted that the Proposed Project incorporates a turn-about driveway and drop off zone on Madison Avenue that is designed to accommodate paratransit vehicles to service the project's residents. The turn-about is designed to accommodate full size city busses should any transit stops be proposed for this location.

#### CMP Transit Impacts

Transit adjustments were applied to the proposed and existing commercial uses only, since the trip generation rates applied to the residential use already account for transit availability and usage. The net vehicle trips via transit/walk adjustments were developed for the proposed and existing commercial uses, but they must still be determined for the proposed residential use. Given that the capacity of one standard bus is 40 riders, and there are nine bus lines with a reasonable walking distance of the Project site, with several more bus lines and rail facilities slightly outside the reasonable walking distance (but within approximately one-half mile), the Proposed Project is anticipated to have a minimal impact on the surrounding transit network. Therefore, it is expected that the incremental additions of Project person transit trips would not have a significant impact on transit service in the study area.

#### **Bicycle Facilities**

The Mobility Plan 2035 designates a network of bicycle lanes (Tier 1, Tier 2 and Tier 3) and bicycle paths in the area of project. Tier 1 Bicycle Lanes are bicycle facilities on

arterial roadways with physical separation. Tier 2 and Tier 3 Bicycle Lanes are bicycle facilities on arterial roadways with striped separation. Bicycle Paths are facilities outside of the roadway. Bicycle Routes are identified routes for bikes and are streets signed to alert drivers to bicyclists sharing the roadway spaces – often with the use of "sharrow" symbols painted on the street.

Existing bicycle facilities in the project area comprise a Bicycle Lane or Bicycle Route on the following streets:

- New Hampshire Avenue south of Rosewood Avenue Bicycle Route
- Rosewood Avenue between New Hampshire Avenue and Serrano Avenue Bicycle Route
- 1<sup>st</sup> Street between Vermont Avenue and Beverly Boulevard Bicycle Lane on both sides
- Hoover Street south of Council Street and north of Temple Street Bicycle Route
- Temple Street between Hoover Street and Robinson Street Bicycle Route
- Robinson Street between Temple Street and Council Street Bicycle Route
- Council Street between Hoover Street and Robinson Street Bicycle Route
- Clinton Street between Heliotrope Drive and Hoover Street Bicycle Route
- Bellevue Avenue east of Hoover Street Bicycle Route
- Heliotrope Drive between Melrose Avenue and Rosewood Avenue Bicycle Lane

The Mobility Plan 2035 identifies designated bicycle facilities planned for implementation over the longer term. The Mobility Plan 2035 designates approximately 1,200 miles of street in the City's Bicycle Network that includes a Bicycle Enhanced Network and a Bicycle Lane Network. The Bicycle Enhanced Network consists of Bicycle Paths, Tier 1 Bicycle Lane (Protected Bicycle Lane) and Neighborhood Enhanced Network. The Bicycle Lane Network consists of Tier 2 and Tier 3 Bicycle Lanes.

In the area of the Project, the Mobility Plan 2035 recommends Tier 2 bike lanes along Beverly Boulevard east of Westmoreland Avenue, on Silverlake Boulevard east of Virgil Street, on 1<sup>st</sup> Street between Virgil Street and Beverly Boulevard; Tier 3 bike lanes along Beverly Boulevard west of Westmoreland Avenue, on Temple Street east of Westmoreland Avenue, and along Virgil Avenue. These are in addition to, or change to the existing bicycle facilities. For the remaining facilities, the Mobility Plan 2035 will implement the overall list of improvements in phases over many years, and in many cases the proposals are conceptual and the plan does not identify the specific street configurations or geometries that will be necessary to accommodate the proposed bike lanes on those streets – which are details to be worked out in the future.

At the time of preparing this report, none of the designated planned facilities in the area as identified above are programmed for completion before the Project design year of 2023 so there are no definitive details on roadway layouts to accommodate the improvements, and they are not included in the following analysis. These facilities will be evaluated by LADOT over time as the Mobility Plan 2035 is implemented in future phases. The Proposed Project would not prevent or hinder these improvements from being constructed in the future. Therefore, the Proposed Project would not conflict with any existing or planned bicycle facilities and impacts would be less than significant.

#### **Pedestrian Facilities**

The Project Site is located in an area with well-developed pedestrian facilities, including sidewalks on all streets and crosswalks at all intersections. Adjacent to the Project site there is a fifteen-foot sidewalk on Juanita Avenue west of the Project site, a twelve-foot sidewalk on Oakwood Avenue north of the Project Site, and an eight-foot sidewalk on Madison Avenue east of the Project Site. Beverly Boulevard, south of the Project Site, is currently improved with a thirteen-foot sidewalk.

According to Walkscore.com<sup>89</sup>, the area of the Project has a walkability score of 96 (out of 100) – which is described as a "Walker's Paradise" where 'most errands can be accomplished on foot'. (Walkscore also allocates a transit score of 100 - 'riders paradise, world class public transportation', and a bike score of 63 – bikeable, flat as pancake, minimal bike lanes') to the area of the Project.

The Mobility Plan 2035 defines Pedestrian Enhanced Districts to identify "where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to/from manor destinations within communities." The Mobility Plan 2035 aims to promote walking and reduce reliance on other modes for shorter trips by providing more attractive and wider sidewalks, and adding pedestrian signalization, street trees, and other design features that encourage people to take trips on foot instead of by car.

<sup>&</sup>lt;sup>89</sup> Walk Score is a large-scale, public access walkability index that assigns a numerical walkability score to any address in the United States, Canada, and Australia. Walk Score is based on analysis of walking routes to nearby amenities, as well as measuring pedestrian friendliness by analyzing population density and road metrics such as block length and intersection density.
The Mobility Plan 2035, in identifying Pedestrian Enhanced Districts, has designated the following arterial streets in the area of the Project as Pedestrian Street Segments: Beverly Boulevard, Virgil Avenue, Hoover Street, Temple Street, Silver Lake Boulevard, and 3<sup>rd</sup> Street.

The Proposed Project introduces various streetscape improvements to encourage more pedestrian-friendly street edges along Juanita and Madison Avenues. Along Madison Avenue, a new on-site passenger loading zone with turn-around will be centrally located between Enlightenment Plaza & PATH Metro Villas on the east side of the street. The sidewalk on Madison Avenue adjacent to the Project, will be widened to up to 12 feet wide in most locations. On Juanita Avenue existing 12 foot sidewalks will be retained. Existing sidewalk widths will also be maintained on Oakwood Avenue. Utility poles fronting the property along Madison, Oakwood & Juanita Avenues will be relocated underground creating more continuous sidewalks. Additionally, nine new street trees will be placed along these three street frontages. Twelve new bike racks will be strategically located along both Juanita & Madison Avenues. These streetscape improvements will aid in all streets adjacent to the Project becoming more pedestrian oriented.

These improvements, along with the vacation of part of Madison Avenue and portions of Oakwood and Juanita Avenues will also help secure the Project Site seamlessly engage the campuses of PATH Metro Villas and Enlightenment Plaza. Thus, the Proposed Project would not conflict with any applicable policies related to pedestrian circulation and impacts would be less than significant.

## Vision Zero

The City of Los Angeles Department of Transportation is implementing a program called Vision Zero Los Angeles<sup>90</sup>, which represents a citywide effort to eliminate traffic deaths in the City of Los Angeles by 2025. Vision Zero has two goals: a 20% reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT identified a network of streets, called the High Injury Network (HIN), which has a higher incidence of severe and fatal collisions, and where LADOT has determined that pedestrian enhancement improvements will be most effective in meeting these goals. The HIN is comprised of 386 corridors that represent 6% of Los Angeles' street miles, and 65% of all deaths and severe injuries involving people walking and biking occur on these 6% of streets.

The Proposed Project is located near Beverly Boulevard, which is on the High Injury Network (HIN). Other streets in the vicinity of the Project Site that are located on the High

<sup>&</sup>lt;sup>90</sup> Vision Zero Los Angeles 2015-2025 – Action Plan, January 2017.

Injury Network are Vermont Avenue, Temple Street – east of Robinson Street, and Virgil Avenue – north of Middlebury Street.

The Proposed Project introduces various streetscape improvements to encourage more pedestrian friendly street edges along Juanita and Madison Avenues. Along Madison Avenue, a new onsite passenger loading zone with turn-around will be centrally located between Enlightenment Plaza & PATH Metro Villas on the east side of the street. The sidewalk on Madison Avenue adjacent to the Project, will be widened to up to 12ft wide in most locations. On Juanita Avenue existing 12-foot sidewalks will be retained. Existing sidewalk widths will also be maintained on Oakwood Avenue. Utility poles fronting the property along Madison, Oakwood & Juanita Avenues will be relocated underground creating more continuous sidewalks. Additionally, nine new street trees will be placed along these three street frontages. Twelve new bike racks will be strategically located along both Juanita & Madison Avenues. These streetscape improvements will aid in all streets adjacent to the Project becoming more pedestrian oriented. These improvements, along with the vacation of part of Madison Avenue and portions of Juanita Avenue and Oakwood Avenue will also help seamlessly engage the campuses of PATH Metro Villas and Enlightenment Plaza. As such, the Proposed Project would not conflict with Vision Zero policies and impacts upon pedestrian safety would be less than significant.

# b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

**Less Than Significant Impact.** CEQA Guidelines Section 15064.3(b)(1) states for land use projects, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing Major Transit Stop or a stop along an existing High Quality Transit Corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

On July 30, 2019, the City of Los Angeles adopted LADOT's CEQA Transportation Assessment Guidelines (TAG), which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts in conformance with SB 743. The adopted TAG establishes VMT as the City's formal method of evaluating a project's transportation impacts. As part of the preparation of this version of the City's TAG, the City updated its travel demand simulation model and transportation impact thresholds to be consistent with the VMT impact methodology. As discussed above, for purposes of addressing the projects consistency with CEQA Guidelines Section 15064.3, the following analysis is based on the findings

and conclusions of the supplemental Enlightenment Plaza Project – VMT Analysis, dated October 2019 contained in Appendix I.2 to this SCEA.

## VMT Screening

The preparation of a transportation assessment, which includes a VMT analysis, is required for any project that would generate a net increase of 250 or more daily vehicle trips and requires discretionary action. Table 6.26, below, shows the VMT trip generation screening comparison of the existing daily trips and proposed daily trips to determine if a VMT analysis is required. Because the 374 net trips generated by the Proposed Project exceed the threshold of 250 trips, a VMT analysis was conducted to determine the VMT impacts for the Proposed Project.

	Land Use	Scale	Daily Trips			
Proposed	Permanent Supportive Housing	449 DU				
	Apartments	5 DU				
	Subtotal		544			
Existing	AT&T Yard	7,862 sf				
	Subtotal		170			
	Net Difference [Proposed – Existing]		374			
Analysis Required [Net Difference > 250] Yes						
Notes:	Notes:					
DU = Dwelling Units						
sf = square feet						
Source: The I	Source: The Mobility Group, Enlightenment Plaza Project VMT Analysis, February 5, 2020.					

Table 6.26VMT Trip Generation – Project Screening Comparison

## VMT Thresholds

LADOT has identified thresholds for significant VMT impacts by sub-area of the City, by Area Planning Commission (APC) area. The State of California Office of Planning and Research (OPR) has found that a VMT per capita or per employee that is 15% or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA. CEQA allows lead agencies to set or apply their own significance thresholds. LADOT set its significance thresholds as follows: a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee more than 15% below the existing average work VMT per employee for the APC area in which it's located. (LADOT Guidelines, page 17.) The Project is located in the Central APC. For this area of the City the following specific thresholds have been identified:

Household VMT Per Capita:	6.0
VMT Per Employee:	7.6

## VMT Analysis

As shown in Table 6.27, below, with the Proposed Project, the Household VMT per Capita would be 5.4 compared to the threshold of 6.0, and the Work VMT per Capita would be 0 compared to the threshold of 7.6. Therefore, it is concluded that the Project would not cause significant VMT impacts for either Household VMT and/or Work VMT. As such, no mitigation is warranted. The LADOT VMT calculation worksheets are provided in Appendix I-2 to this SCEA.

Table 6.27 Summary of VMT Analysis

Category	Household		Work			
	Household	Household		Work	Work	
Scenario	VMT	VMT Per		VMT	VMT per	
	Threshold	Capita	Impact	Threshold	Employee	Impact
Proposed Project	6.0	5.4	No	7.6	0.0	No
Source: The Mobility Group, <u>Enlightenment Plaza Project VMT Analysis</u> , February 5, 2020.						

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

**Less Than Significant Impact.** A significant impact may occur if the Proposed Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Proposed Project would not include any unusual or hazardous design features.

Current vehicular access is provided by driveways located along Juanita Avenue and Madison Avenue, that provide access to the surface parking lot and manufacturing uses on the Project Site. As shown in Figure 3.7, Plot Plan, the main vehicular access (ingress and egress) is to be provided from Madison Avenue. A centralized drop-off and pickup will also be provided on Madison Avenue. Vehicular access will also be provided from Oakwood Avenue and Juanita Avenue. All Project driveways will be designed according to LADOT standards, so there will be no significant impacts due to roadway design hazards.

It is anticipated that the vacated portions of Madison Avenue and Oakwood Avenue would not be available for general public use, and would be controlled by a control arm type device. Project residents and employees would pass through the vacated street section with use of key card or similar device to operate the control barrier. A similar option would be provided for the adjacent PATH project on the east side of Madison Avenue to Oakwood Avenue. The public would not however be able to use the vacated sections of Madison Avenue, Juanita Avenue and Oakwood Avenue. Access and circulation for the Proposed Project would there remain unchanged with the potential street vacations. Thus, the Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant.

#### d) Result in inadequate emergency access?

**Less Than Significant Impact.** A significant impact may occur if the project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. As previously discussed in Section 6.9(f), the Project Site is not located in a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.<sup>91</sup> Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.<sup>92</sup>

Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Further, the Proposed Project would be developed in a manner that satisfies the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. As required for all development projects that have the potential to result in partial street or sidewalk closures, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LADOT to ensure that

<sup>&</sup>lt;sup>91</sup> Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008.

<sup>&</sup>lt;sup>92</sup> City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.

all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Accordingly, any temporary construction traffic impacts would be less than significant.

# 6.18 Tribal Cultural Resources

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:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- b. 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.



- 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: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?
- b) 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: 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?

**Responses to a and b: Less Than Significant Impact.** For purposes of this analysis, Dudek was retained to prepare a Tribal Cultural Resources Report to assess the potential for significance of the Project to impact resources associated with California Native American tribes. The following section is based on the following technical report:

• Dudek, Draft Tribal Cultural Resources Report for the 316 N. Juanita Avenue Project, City of Los Angeles, Los Angeles County, April 2020.

For the purposes of the Tribal Cultural Resources Report, the entire block in which the Proposed Project Site is situated is considered the Study Area. The Study Area is on a relatively flat lot and is currently developed with nine buildings. The Study Area is situated within a residential and commercial zone in the northeastern corner of the Wilshire Community Plan Area and the northwest corner of the Rampart Village of the City of Los Angeles. Surrounding uses in the immediate vicinity of the Study Area include commercial uses to the east, west, and south and residential uses to the north. The Study Area is also located immediately south of the US-101 Freeway. The entirety of the Study Area is developed with exposed ground surface and a few trees identified within APNs 5501-001-016 and 5501-001-019. Additionally, the Proposed Project Site includes a tree well situated in the west portion of the parking lot within APN 5501-001-800.

The Study Area is situated in the valley representing Downtown Los Angeles, approximately 12.4 miles northeast of the Pacific Ocean. Existing development is underlain by older alluvial sediments and marine sediments. Soils are dominated by the urban land-Montebello complex, associated with low-slope conditions and soils derived from older alluvium and human transported soils. Urban land soils make up the majority (70%) of Urban land-Montebello complex and are characterized by areas that have been developed with structures, parking lots, buildings, etc. and are underlain by disturbed natural soils. Any cultural deposits that are or may have been present within the Proposed Project Site would likely have been located on or near the surface, within the younger quaternary alluvium that makes up the surficial deposits within the entire Study Area. However, given that the entire surface of the Proposed Project Site has been disturbed for the extant developments, cultural resources located on or near the surface may have

been adversely impacted or destroyed, though it is possible that the asphalt covering the Proposed Project Site has capped deeper cultural deposits.

Dudek completed a CHRIS records search conducted at the SCCIC on April 8, 2019 of the Study Area and a 0.5-mile (804 foot) record search area. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation Site Records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the Study Area, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility.

The SCCIC records indicate that 22 cultural resources investigations have been conducted within a half-mile of the Study Area. Of these, two studies have been conducted within a portion of the Study Area. Both of these reports are cultural resource studies prepared by LSA Associates, Inc. in support of a proposed wireless service facilities to be developed by AT&T Fixed Wireless Services. Neither study identified archaeological resources within a half-mile of the Study Area and neither project required ground disturbance. Therefore, it was determined that there would be no potential to impact any unrecorded archaeological resources.

SCCIC records indicate that a total of 16 previously recorded cultural resources fall within the records search area, none of which are within the Study Area. All 16 resources are historic-era buildings or structures. No prehistoric sites or resources documented to be of specific Native American origin have been previously recorded within a half-mile of the Study Area.

#### Native American Correspondence

As part of the process of identifying cultural resources within or near the Project Site, Dudek contacted the NAHC to request a review of the Sacred Lands File (SLF) on April 4, 2019. The NAHC emailed a response on April 25, 2019, which indicated that the SLF search was completed with negative results. Documents related to the NAHC SLF search are included in Appendix J to this SCEA.

Therefore, because the Project Site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known tribal cultural resources no mitigation measures are required. Nonetheless, adherence to the regulatory compliance measures referenced above in Section 5, Cultural Resources, would ensure impacts associated with the accidental

discovery of any archaeological resources or human remains, including Native American resources would be less than significant. As noted above, in Section 5, if an unexpected discovery of archaeological resources should occur, compliance with the following regulatory compliance measure would be required:

Cultural Resources (Archaeological Resources): In the event that archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the Proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

Compliance with the above-listed regulatory compliance measures substantially conforms to SCAG RTP/SCS Program EIR MM-CUL-2(b)CUL and would reduce any potentially significant impacts to less than significant levels.

#### Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to tribal cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following appropriate -regulatory compliance measures. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to tribal cultural resources would be less than significant.

# 6.19 Utilities and Service Systems

Would the project:

- 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 or relocation of which could cause significant environmental effects?
- b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- d. 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?
- e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

#### **PROJECT-SPECIFIC IMPACTS**

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 or relocation of which could cause significant environmental effects?

**Less Than Significant Impact.** A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The determination of whether a project results in a significant impact on water shall be made considering the

Potentially Significant Impact	with Mitigation Incorporated	Less Than Significant Impact	No Impact
		$\boxtimes$	

Less Than Significant following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) 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 (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

#### Water Treatment Facilities and Existing Infrastructure

The LADWP ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. 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).<sup>93</sup> In 2017, the LADWP's water system supplied 4 million customers with nearly 160 billion gallons of treated water, resulting in an average daily water demand of approximately 438 mgd. Therefore, the LAAFP has a remaining capacity of treating approximately 162 mgd.<sup>94</sup>

As shown in Table 6.28, the Proposed Project would generate a net increase in water demand of approximately 37,053 gallons per day (gpd) of water (or approximately 41.5 acre-feet per year), which is significantly below available capacity. Because the Proposed Project's residential growth is within SCAG's forecast, the Proposed Project's increased water demand would not measurably reduce the LAAFP's capacity. Therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Proposed Project would have a less than significant impact.

Although no further upgrades are anticipated at this time, in the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be of

 <sup>&</sup>lt;sup>93</sup> U.S. Department of Energy, website: https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization—-oxygen-plant-replacement, accessed May 2019.

<sup>&</sup>lt;sup>94</sup> Los Angeles Department of Water and Power, Water, L.A.'s Drinking Water Quality Report, website: http://www.ladwp.com/, accessed May 2019.

Type of Use	Size	Water Demand Rate (gpd/unit) <sup>a</sup>	Total Water Demand (gpd)	
Existing Uses (to be removed)				
Commercial	7,881 sf	0.05 gpd/sf	394	
Single-family residential	3 du	140 gpd/du	420	
	Total Exist	ing Water Demand:	814	
Proposed Project				
Residential Units (454 total)				
Studio	370 du	75 gpd/du	27,750	
One Bedroom	71 du	110 gpd/du	7,810	
Two Bedroom	13 du	150 gpd/du	1,950	
Open Space				
Landscaped Area	7,627 sf <sup>b</sup>	(see Appendix C)	357	
	Total Project S	Site Water Demand:	37,867	
	Less Exis	sting Water Demand:	(814)	
Net Water Demand: 37,053				
<ul> <li>Notes: sf =square feet; du = dwelling units</li> <li><sup>a</sup> Consumption Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer Generation Factor for Residential and Commercial Categories table, effective April 6, 2012. It is assumed that all water usage would convert to wastewater.</li> </ul>				

Table 6.28Proposed Project Estimated Water Demand

<sup>b</sup> Based on 7,627 square feet of landscaped area per the Landscape Concept Plan Sheet L001 dated November 2019.

Source: Parker Environmental Consultants, February 2020.

a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

## Wastewater Treatment Facilities and Existing Infrastructure

A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to 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.

The Los Angeles Bureau of Sanitation (BOS) provides sewer service to the Proposed Project Site. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). 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.<sup>95</sup> This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. As shown in Table 6.29 below, the Proposed Project would generate a net increase of approximately 37,645 gpd of wastewater, representing a fraction of one percent of the available treatment capacity at HTP.

With respect to local infrastructure, the Project Site is presently served by a network of sewer lines that are located beneath major streets that convey sewage from the Project Site to the HWRP. Based on correspondence with BOS dated August 26, 2019 (see Appendix G to this SCEA), the sewer infrastructure in the vicinity of the Proposed Project includes an existing 8-inch line of Juanita Avenue. The sewage from the existing 8-inch line feeds into a 20-inch line on Berendo Street before discharging into a 48-inch sewer line on Normandie Avenue. Based on the estimated flows, the existing sewer system has adequate capacity to accommodate the total wastewater flows generated by the **Proposed Project.** 

Turne of Upp	Sina	Wastewater Demand	Total Wastewater	
Type of Use	Size	Rate (gpd/unit) *	Demana (gpa)	
Existing Uses (to be removed)				
Commercial	7,881 sf	0.096 gpd/sf	757	
Single-family residential	3 du	140 gpd/du	420	
	Total Existing Waste	water Generation:	1,177	
Proposed Project				
Residential Units (454 total)				
Studio	370 du	75 gpd/du	27,750	
One Bedroom	71 du	110 gpd/du	7,810	
Two Bedroom	13 du	150 gpd/du	1,950	
Supportive Services <sup>b</sup>	11,772 sf	50 gpd/1,000 sf	982	
Common Areas <sup>c</sup>	14,600 sf	50 gpd/machine	330	
	Total Project S	ite Water Demand:	38,822	
	Less Exist	ing Water Demand:	(1,177)	
	N	let Water Demand:	37,645 gpd	
<ul> <li>Notes: sf =square feet; du = dwelling units</li> <li><sup>a</sup> Wastewater generation rates are based on the City of Los Angeles Department of Public Works, Bureau of Sanitation, Enlightenment Plaza Project – Request for Wastewater Service Information, August 26, 2019 (See Appendix G to this SCEA).</li> <li><sup>b</sup> Supportive Services include but are not limited to community rooms, case management offices, computer rooms and/or kitchen areas.</li> <li><sup>c</sup> Common areas include but are not limited to lobbies, mailrooms, laundry rooms, and/or other common decks and interior rooms.</li> </ul>				

Table 6.29
<b>Proposed Project Estimated Wastewater Generation</b>

Source: Parker Environmental Consultants, 2020.

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City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav externalId/s-lsh-wwd-cw-phwrp?\_adf.ctrl-state=t4yrq0jkg\_4&\_afrLoop=10780400868530458#!, accessed May 2019.

A final evaluation of sewer flows would need to be verified as part of the permit process and to identify a specific sewer connection point for the Project Site. This process ensures that the system can accept the anticipated wastewater flows from the Proposed Project at the time of connection, as opposed to prematurely committing to projects that are in the environmental review or entitlement process. At the time of connection, the Bureau of Sanitation will check the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. However, based on the configuration of sewer lines serving the Proposed Project, and the BOS correspondence dated August 26, 2019, it is anticipated that the Proposed Project's sewer flows would be routed to connect to the existing lines under Juanita Avenue and Madison Avenue. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right-of-way. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

#### Stormwater Drainage Facilities

As described in Section 6.10, Hydrology and Water Quality, the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Proposed Project would be required to demonstrate compliance with Low Impact Development (LID) standards and retain or treat the first <sup>3</sup>/<sub>4</sub>-inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event, whichever is greater. The Proposed Project Site is currently developed with three commercial buildings, three single-family residential buildings, and one surface parking lot. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in Section 6.10, the Proposed Project shall comply with NPDES requirements and the LID regulations, and implement Best Management Practices (BMPs) during the construction and operation of the Proposed Project.

The appropriate design and application of BMPs devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. Thus, development of the Proposed Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, Proposed Project impacts on stormwater drainage infrastructure would be considered less than significant.

## Electricity and Natural Gas

As discussed in response to Question VI(a), energy, electricity and natural gas are provided by the LADWP and Southern California Gas, respectively. Adequate electricity and natural gas service and supplies are available in the immediate project vicinity and would be provided to the Project Site. The availability of electricity and natural gas is dependent upon adequate generating capacity, adequate fuel supplies, and a reliable distribution system. The estimated power requirement for the Proposed Project is 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. Construction and operation of the Proposed Project would not necessitate the construction of off-site facilities or infrastructure improvements that would have the potential to cause significant environmental impacts. As such, project impacts would be less than significant.

#### Telecommunications

Adequate telecommunications services exist within in the immediate the Proposed Project's vicinity and would be provided to the Project Site based on demand. Construction and operation of the Proposed Project would not necessitate the construction of off-site telecommunication facilities that would have the potential to cause significant environmental impacts. As such, Proposed Project impacts to telecommunication facilities would be less than significant.

# 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?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. The determination of whether the Proposed Project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) 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 (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project (SWP), and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 Acre-feet per year (AFY) in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table 6.28, the Proposed Project's net increase for water demand would be 37,053 gallons per day. The Proposed Project's population, housing, and employment growths are within SCAG's forecast. Accordingly, the Proposed Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2015 UWMP. Thus, the Proposed Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, water saving showerheads, and low flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184248, Los Angeles Ordinance No. 184,692, the 2017 Los Angeles Plumbing Code, the 2016 California Green Building Standards Code (CAL Green) and the 2017 Los Angeles Green Building Code. With respect to landscaping, the Proposed Project would be required to comply with Los Angeles City Ordinance No. 170978 and the City of Los Angeles Irrigation Guidelines, 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).

The City of Los Angeles has enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance. Compliance with the regulatory compliance measures identified above would reduce the Proposed Project's demands for potable water resources to a less than significant level.

## Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project, related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City of Los Angeles. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City of Los Angeles through the year 2040, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. As discussed previously in Section 6.14, Population and Housing, the Proposed Project's population and employment growth is consistent with SCAG's growth projections for the City of Los Angeles subregion. Similar to the Proposed Project, each related project would be evaluated to determine whether the water demand was accounted for in the UWMP or would otherwise be required to obtain approval from the LADWP certifying that the LADWP has sufficient water supplies available to serve the project. As such, the additional water demands generated by the Proposed Project are accounted for in the 2015 Urban Water Management Plan, and impacts associated with increased water demand would not be cumulatively considerable, and cumulative impacts on water supply would be less than significant.

#### c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

**Less Than Significant Impact.** A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to 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. A significant impact would also occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and

discharge requirements. The Los Angeles Regional Water Quality Control Board (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the project area.

Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Water Reclamation Plant (HWRP). The HWRP is a public facility and, therefore, is subject to the State's wastewater treatment requirements. Wastewater from the Project Site is and would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB. As discussed above, the Hyperion Water Reclamation Plant has sufficient capacity for the Proposed Project. Therefore, a less than significant impact would occur.

## Cumulative Impacts

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects would further increase regional demands on the HWRP's capacity.

## Local Wastewater Generation

Similar to the Proposed Project, each related project would be required to obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since the Proposed Project would require approval from the Bureau of Sanitation, signifying that the sewer lines serving the Project Site have adequate capacity, the Proposed Project would not be expected to contribute to a local cumulative impact. Locally, the Proposed Project would not be cumulatively considerable.

## Regional Wastewater Generation

The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City of Los Angeles and surrounding area. However, it is anticipated that the 175 mgd of available capacity in the HWRP would not be significant reduced with the cumulative wastewater generation from the related projects and Proposed Project. As such, cumulative impacts with respect to wastewater demand would be less than significant.

# d) 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?

**Less Than Significant Impact.** A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be

made considering the following factors: (a) 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; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

State law (AB 341) currently requires at least 50% solid waste diversion and establishes a state-wide goal of not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.<sup>96</sup> Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030.<sup>97</sup>

In order to meet the above state requirements and local solid waste diversion goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that will 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 will 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.

The Project Site is located within the North Central Commercial Waste Franchise Zone, which is serviced under contract to Athens Services. Under the existing contract, the service provider is required to deliver all solid waste resources collected to the certified facilities specified in Table 6.30, below. After processing at the designated diversion and recycling facility centers, the remaining landfill-bound waste from areas within the North

<sup>&</sup>lt;sup>96</sup> City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.

<sup>&</sup>lt;sup>97</sup> City of Los Angeles, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015.

Central Commercial Waste Franchise Zone would utilize the Chiquita Canyon Landfill, Mid-Valley Sanitary Landfill, San Timoteo Sanitary Landfill, Victorville Sanitary Landfill, and the Savage Canyon Landfill. For purposes of providing a conservative analysis, it is assumed that all of the Proposed Project's solid waste would be disposed of at the Chiquita Canyon Landfill.

Facility Name	Facility Address	Primary or Secondary		
Mid-Valley Sanitary Landfill	2390 N Alder Ave Rialto, CA 92377	Primary/Secondary		
Chiquita Canyon Landfill	29201 Henry Mayo Dr. Castaic, CA 91384	Primary/Secondary		
San Timoteo Sanitary Landfill	San Timoteo Canyon Rd. Redlands, CA 72373	Primary/Secondary		
Victorville Sanitary Landfill	18600 Stoddard Wells Rd Victorville, CA 92307	Primary/Secondary		
Savage Canyon Landfill	13919 E Penn St. Whittier, CA 90602	Primary/Secondary		
Athens Industry MRF	14048 E Valley Blvd. City of Industry, CA 91746	Secondary (Transfer)		
Athens Sun Valley MRF & Transfer Station	11121 Pendleton St. Sun Valley, CA 91353	Primary (Transfer)		
Central LA Recycling & Transfer Station (CLARTS)	2201 E Washington Blvd. Los Angeles, CA 90034	Secondary (Transfer)		
Source: City of Los Angeles Department of Public Works, Personal Services Contract between the City of Los Angeles and Arakelian Enterprises, Inc., DBA Athens Services, for Exclusive Franchise to Provide Collection, Transfer, Processing, and Disposal Services for Solid Resources to Commercial Establishments and Applicable Multifamily Establishments in the West Los Angeles, North Central, and Harbor Zones, September 2016.				

Table 6.30North Central Zone Authorized Disposal Facilities

The Chiquita Canyon Landfill has 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 beginning in 2025 through the year 2047.<sup>98</sup> Based on the current conditional use permit (CUP 2004-00042(5)), 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.<sup>99</sup> 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

<sup>&</sup>lt;sup>98</sup> County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2017 Annual Report, April, 2019 (at page 25).

 <sup>&</sup>lt;sup>99</sup> County of Los Angeles, Project No. R2004-00559-(5), Conditional Use Permit No. 2004-0042-(5) July 25, 2017.

capacity shall not be exceeded.<sup>100</sup> In 2017, the Chiquita Canyon Landfill had an average disposal intake of 4,588 tons per day.<sup>101</sup>

Based on the calculations provided in Table 6.31, it is estimated that the proposed construction activities would generate approximately 5,934 tons of debris during the demolition and construction process that would be exported to a landfill located within the City. In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. 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.

Construction Activity	Size	Rate <sup>a</sup>	Generated Waste (tons)	
Demolition				
Commercial	7,881 sf	155 lbs/sf	611	
Single-family Residential	1,519 sf	155 lbs/sf	118	
Soil Export	3,040 cy	2,400 lbs/cy	3,648	
Asphalt Export	845 cy	2,400 lbs/cy	1,014	
Construction				
Residential and Support Services	247,812 sf	4.38 lbs/sf	543	
		Total Debris:	5,934	
Notes: sf= square feet				

Table 6.31 **Estimated Construction and Demolition Debris** 

<sup>a</sup> USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States. July 1998.

Source: Parker Environmental Consultants, 2019.

As shown in Table 6.32, below, Estimated Operational Solid Waste Generation, the Proposed Project's net generation during operation of the Proposed Project would be 5.381 pounds per day, as compared to the existing uses on the Project Site. However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste

<sup>100</sup> Ihid

<sup>101</sup> County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2017 Annual Report, April, 2019 (at page 63).

collection services. The amount of solid waste generated by the Proposed Project is within the available capacities at area landfills and the Proposed Project's impacts to regional landfill capacity would be less than significant. In compliance with AB 341, 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 Proposed Project's regular solid waste disposal program. The Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. The amount of solid waste generated by the Proposed Project is within the available capacities of area landfills, and the Proposed Project's impacts to regional landfill capacity would be less than significant.

Type of Use	Size <sup>b</sup>	Solid Waste Generation Rate <sup>a</sup> (Ibs/unit/day)	Total Solid Waste Generated (Ibs/day)	
Existing Uses (to be removed)				
Commercial (7,881 sf)	15 emp	10.53 lbs/employee/day	134	
Single-family Residential	3 du	12.23 lbs/du/day	37	
	Total Existing	Solid Waste Generation:	171	
Proposed Project				
Multi-family Residential	454 du	12.23 lbs/du/day	5,552	
Total Project Solid Waste Generati			5,552	
	171			
NET TOTAL Solid Waste Generation: 5,381				
Notes: sf = square feet, emp = employees				

**Table 6.32 Expected Operational Solid Waste Generation** 

<sup>a</sup> Includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

<sup>b</sup> The employee generation factor for commercial and residential uses was taken from the United States Green Building Code, Building Area per Employee by Business Type, May 13, 2008.

Source: Parker Environmental Consultants, 2019.

#### Comply with federal, state, and local management and reduction statutes e) and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services. Mandatory recycling of organic waste is the next step toward achieving California's recycling and greenhouse gas emission goals. Organic waste such as green materials and food materials are recyclable through composting and mulching, and through anaerobic digestion, which can produce renewable energy and fuel. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

The Proposed Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Proposed Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. The Proposed Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required.

#### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing

the daily excess capacity of the existing landfills serving the City of Los Angeles. Based on the 2017 Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the countywide cumulative need for Class III landfill disposal capacity of approximately 126.4 million tons in the year 2032 will not exceed the 2017 remaining permitted Class III landfill capacity of 167.6 million tons.<sup>102</sup> However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the Countywide Integrated Waste Management Plan – Los Angeles County - Countywide Summary Plan and Citing Element (adopted December 2016) demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

Furthermore, it should be noted that the City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with the Proposed Project is within those projections. In addition, projects within the City of Los Angeles must comply with the City's SRRE.

As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.<sup>103</sup> Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. These programs include Green Mulching and Composting workshops, back 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

<sup>&</sup>lt;sup>102</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.

<sup>&</sup>lt;sup>103</sup> City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.

recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Proposed Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Moreover, as with the Proposed Project, other related projects would participate in regional source reduction and recycling programs significantly reducing the amount of solid waste deposited in area landfills. Therefore, the Proposed Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

# 6.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would	the project:				
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?				$\boxtimes$
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				
C.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				

#### Responses a through d:

**No Impact.** A potential significant impact upon wildfire hazards could occur if the Project Site were to be located on state responsibility areas or lands classified as very high fire hazard severity zones. Lands subject to this provision have been designated by the City of Los Angeles Fire Department (LAFD) pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire

Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code. The Very High Fire Hazard Severity Zone (VHFHSZ) was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The Project Site is not located within a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, this checklist question is not applicable to the Proposed Project, and no impact would occur.

# 6.21 Mandatory Findings of Significance

- a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

_	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
, , ,				
1		$\boxtimes$		

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

**Less Than Significant Impact.** A significant impact would occur only if the Proposed Project results in potentially significant impacts for any of the above issues. The Proposed Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources or California's history or prehistory. As noted in the analysis above, the Project Site is developed with three commercial buildings, three single-family residential buildings, one office building, and one surface parking lot and does not support any substantial habitat of a fish or wildlife species. Vegetation on the Project Site is limited to trees on the Project Site, trees in the public right-of-way, and limited landscaping. Compliance with standard regulatory compliance measures would reduce potential impacts upon migratory bird species associated with the proposed tree removals of 4 non-protected trees, should construction commence during the breeding season.

Additionally, although no known direct impacts to historic resources are anticipated, compliance with existing regulations would ensure any impacts upon cultural resources are less than significant level in the unlikely event any such historic, or archaeological materials are accidentally discovered during the construction process.

With respect to paleontological resources, excavations that extend down below five feet may encounter significant fossil vertebrate specimens. Any substantial excavations below the uppermost layers in the project area, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. With adherence to regulatory compliance, any impacts to paleontological resources would be less than significant. Therefore, with adherence to regulatory compliance measures, the Proposed Project would not have the potential to degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. A significant impact may occur if the Proposed Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. As concluded in the analysis above, the Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, utilities, tribal cultural resources, and wildland fire hazards would be less than significant. As such, the Proposed Project's contribution to cumulative impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts to humans would be reduced to less than significant through the implementation of the applicable mitigation measures identified within this SCEA analysis.

#### Lead Agency

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# 2. Acronyms and Abbreviations

AB	Assembly Bill
ACM	Asbestos-containing materials
AFY	Acre-feet per vear
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
BMPs	Best Management Practices
BOS	Bureau of Sanitation
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
CalEPA	California Environmental Protection Agency
CARB	California Air Resources Board
CBC	California Building Code (2007)
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
Cf	Cubic feet
CGS	California Geological Survey
CH <sub>4</sub>	Methane
CLARTS	Central Los Angeles Refuse Transfer Station
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO2e	carbon dioxide equivalent
CPA	Community Plan Area
CRA/LA	Community Redevelopment Agency of the City of Los Angeles
CREC	Controlled Recognized Environmental Condition
CWA	Clean Water Act
CWC	California Water Code
су	cubic yards
dB	decibel
dBA	A-weighted decibel scale
DHS	California Department of Health and Services
DWP	Department of Water and Power
du	dwelling unit
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
	Los Angeles State Enterprise Zone
FAR	Floor Area Katio
	Federal Emergency Management Agency
	rederal Highway Administration
FIIP	rederal Transportation improvement Program
GHG	greenhouse gas
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gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HQTA	High-Quality Transit Areas
HREC	Historic Recognized Environmental Condition
HSA	Hyperion Service Area
HVAC	Heating, Ventilation and Air Conditioning
HWRP	Hyperion Water Reclamation Plant
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
kWh	kilowatt-hours
LAAFP	Los Angeles Agueduct Filtration Plant
LABC	City of Los Angeles Building Code
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
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 <sub>dn</sub>	day-night average noise level
LDC	Land Development Category
LEED	Leadership in Energy and Environmental Design
Lea	equivalent energy noise level/ambient noise level
LID	Low Impact Development
LOS	Level of Service
LST	localized significance thresholds
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MEP	maximum extent practicable
MERV	Minimum Efficiency Reporting Value
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
MWD	Metropolitan Water District
N <sub>2</sub> O	nitrous oxide
NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commision
NO <sub>2</sub>	nitrogen dioxide
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O <sub>3</sub>	Ozone

OPR	Office of Planning and Research	
PFC	perfluorocarbons	
PM	particulate matter	
PM <sub>10</sub>	respirable particulate matter	
PM <sub>2.5</sub>	fine particulate matter	
ppm	parts per million	
PPV	Peak Particle Velocity	
PRC	Public Resources Code	
PSI	pounds per square inch	
PUC	Public Utilities Commission	
RCP	Regional Comprehensive Plan	
REC	Recognized Environmental Condition	
RMS	Root Mean Square	
ROG	Reactive Organic Gases	
ROWD	Report of Waste Discharge	
RTP	Regional Transportation Plan	
RTP/SCS	Regional Transportation/Sustainable Communities Strategy	
RWOCB	Regional Water Quality Control Board	
SAR	Sonvice Advisory Poquest	
SR	Senate Bill	
SCAG	Southern California Association of Governments	
SCAOMD	South Coast Air Quality Management District	
SCG	Southern California Gas Company	
of	square feet	
SE.	sulfur boxafluorido	
	State Implementation Plan	
	Spille Leake Investigation and Cleanup	
SO <sub>2</sub>	sulfur dioxide	
SOx	sulfur oxides	
SRA	source recentor area	
SRRE	Source Reduction and Recycling Element	
	Standard Urban Storm Water Mitigation Plan	
	Stormwater Management Plan	
	Solid Waste Management Policy Plan	
	State Water Project	
	Storm Water Pollution Prevention Plan	
SWITT	Stormwater Quality Design Volume	
	State Water Resource Control Roard	
JURCD	State Water Resource Control Board	
TAC	transportation control macouros	
	Transportation Control measures	
	Transponation Demand Management	
	Hellswood Freework	
	Hollywood Fleeway	
	United States Environmental Protection Agency	
	United States Fish and Wildlife Service	
	Underground Storage tank	
	Volume to Conseity	
	Volocity in Docibole	
	Very Ligh Fire Hezerd Soverity Zene	
VULUST	very high file hazard Seventy Zone	

VMT	Vehicle Miles Traveled
VMT	Vehicle Miles Traveled

- VOC
- WHO
- WSA
- Volatile Organic Compound World Health Organization Water Supply Assessment Zoning Information and Map Access System ZIMAS