

City of Los Angeles

Department of City Planning City Hall • 200 N. Spring Street, Room 621 • Los Angeles, CA 90012

Sustainable Communities Environmental Assessment

350 South Figueroa Project CENTRAL CITY COMMUNITY PLAN AREA Case Number: ENV-2018-2700-SCEA

Project Location: 350-356 South Figueroa Street, 830 West Third, 825 West Fourth Street, and 333-361 South Flower Street in the City of Los Angeles, California 90071, consisting of the block bound by South Figueroa Street, South Flower Street, West Third Street and West Fourth Street.

Council District: 14—Huizar

Project Description: The Project includes the proposed demolition of an approximately 29,500-squarefoot portion of an existing office and commercial structure and construction of a new, 41-story residential building integrated into the existing structure. The Project site is approximately 160,000 square feet in area and includes approximately 330,000 square feet of existing floor area. The Project would add approximately 624,500 square feet of new residential floor area at the southwest corner of the Project site for a combined 925,000 square feet of floor area. The residential building would be a maximum of 480 feet in height and contain 570 residential units. The Floor Area Ratio (FAR) of the Project would be 5.8:1.

Public Review: A 30-day review period will begin on May 21, 2020, and end on June 19, 2020. Any interested person or agency may comment on this matter by submitting comments to Debbie Lawrence via email at Debbie.lawrence@lacity.org; or by mail to 200 North Spring Street, Room 621, Los Angeles, CA 90012.

APPLICANT:

PREPARED BY:

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ON BEHALF OF:

City of Los Angeles Department of City Planning Central Project Planning Division

May 2020

DRAFT SCEA AND INITIAL STUDY

350 South Figueroa Project City of Los Angeles

PREPARED FOR:

City of Los Angeles Department of City Planning Central Project Planning Division 200 N. Spring Street, Room 621 Los Angeles, CA 90012

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May 2020

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1.1 **PROJECT INFORMATION**

Project Title:350 South Figueroa ProjectProject Location:The Project site is located at 350 South Figueroa Street in the City of Los Angeles,
California 90071.Project Applicant:350 South Figueroa, LLC
3450 Wilshire Boulevard, Suite 1200-115
Los Angeles, CA 90010Lead Agency:City of Los Angeles
Department of City Planning
Central Project Planning Division
200 North Spring Street, Room 621
Los Angeles, CA 90012

1.2 PROJECT SUMMARY

This Sustainable Communities Environmental Assessment (SCEA) has been prepared pursuant to Section 21155.2 of the California Public Resources Code. In 2008 the state legislature created an additional document for environmental review called a Sustainable Communities Environmental Assessment (SCEA). Previously, the City reviewed the environmental impacts of a project through one of three methods: categorical exemption, negative declaration/mitigated negative declaration (MND/ND), or environmental impact report (EIR).

The subject of this SCEA is a Project that includes the proposed demolition of an approximately 29,500square-foot portion of an existing structure and construction of a new, 41-story residential building integrated into the existing structure. The Project site is approximately 160,000 square feet in area and includes approximately 330,000 square feet of existing floor area; the Project would add approximately 624,500 square feet of new residential floor area at the southwest corner of the Project site for a combined 925,000 square feet of floor area.¹ The residential building would be a maximum of 480 feet in height and

¹ Floor Area is defined in the Los Angeles Municipal Code (LAMC 12.03) as "that area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing buildingoperating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."

1.0 Introduction

contain 570 units. The Floor Area Ratio (FAR) of the Project, including the existing building to remain in place, would be 5.8:1.

The Project would include activated street frontages on the building's ground floor, as well as a number of community spaces throughout the building, including open space areas on the sixth-floor podium deck and roof deck. The Project would maintain the existing six levels of parking though the configuration and number of spaces would change. The Project when complete would include approximately 1,387 automobile parking spaces that comply with the Los Angeles Municipal Code-required bicycle parking.

The Project approvals requested by the Applicant include:

- Project Permit Compliance pursuant to LAMC Section 11.5.7 C for the Bunker Hill Specific Plan.
- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, off-site improvements, and installation and hookup approvals for public utilities and related permits, and the removal of trees on public and/or private property.

1.3 REGULATORY BACKGROUND

Through the "Sustainable Communities and Climate Protection Act of 2008," known as Senate Bill 375 (SB 375), the state legislature created a new document for environmental review called a Sustainable Communities Environmental Assessment (SCEA). The intent of a SCEA is to encourage projects that would implement regional plans to reduce greenhouse gas emissions (e.g. by building housing near public transit) by providing for streamlined environmental review of "Transit Priority Projects" that are consistent with an adopted sustainable communities strategy. The SCEA provides complete environmental analysis by evaluating the potential effects of a Project in an Initial Study similar to a Mitigated Negative Declaration, with additional requirements specific to a SCEA as described below.

SB 375 sought to integrate transportation and land use planning to reduce greenhouse gas emissions by directing the State's Metropolitan Planning Organizations (MPO) that prepare regional transportation plans to include in those plans a "sustainable communities strategy" to achieve greenhouse gas emission targets set by the California Air Resources Board.^{2,3} The Southern California Association of Governments (SCAG) is the MPO 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

² Stats. 2008, ch. 728, Section 1; Stats. 2009, ch. 354, Section 5.

³ Gov. Code, Section 65080, subd. (b)(2)(B).

Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which outlines strategies to meet or exceed the greenhouse gas emission targets set by CARB.

1.4 TRANSIT PRIORITY PROJECT CRITERIA

SB 375 provided CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain other criteria. Cities acting as lead CEQA agency within the SCAG region can now prepare a SCEA as the environmental CEQA Clearance for "transit priority projects" that are consistent with SCAG's 2016–2040 RTP/SCS. A transit priority project is a project that meets the following four criteria:

- 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;
- Contains at least 50 percent residential use, based on total building square footage or, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
- Provides a minimum net density of at least 20 units per acre; and
- Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

1.5 SCEA PROCESS

A transit priority project may be approved using a SCEA if it has been determined to not result in significant and unavoidable environmental impacts. For a SCEA, an initial study shall be prepared to identify all potentially significant impacts.⁴ As with an MND, mitigation must be identified for any potentially significant impacts. In addition, for a project to qualify to be evaluated through a SCEA, the project should incorporate all feasible mitigation measures, performance standards and criteria set forth in prior applicable EIRs.⁵ This would include the SCAG 2016–2040 RTP/SCS Program EIR.

A SCEA need not consider the cumulative effects of the project that have been adequately addressed and mitigated in prior EIRs; growth-inducing impacts are not required to be referenced, described or addressed; and project specific or cumulative impacts from cars and light duty truck trips on global warming or the regional transportation network need not be analyzed.⁶ The SCEA does not analyze

⁴ PRC Section 21155.2(b)(1).

⁵ PRC Section 21155.2(a).

⁶ PRC Section 21159.28.

alternatives to a project because, like with an ND or MND, there are no significant impacts that need to be reduced or eliminated through project alternatives.

A draft of the SCEA will be circulated for public comment for a period of not less than 30 days with notice provided in the same manner as required for an environmental impact report.⁷ Prior to acting on the SCEA, the lead agency shall conduct a public hearing and shall review and consider all comments received.⁸

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 alternations 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.

The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

1.6 REQUIRED FINDINGS

The City of Los Angeles has determined that:

- 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 State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted SCAG's determination that the sustainable communities strategy adopted by SCAG in the 2016–2040 RTP/SCS would, if implemented, achieve the greenhouse gas emission reduction targets.
- 3. The Proposed Project qualifies as a transit priority project pursuant to Public Resources Code Section 21155(b).

⁷ PRC Section 21155.2(b)(3).

⁸ PRC Section 21155.2(b)(5).

- 4. The Proposed Project is a residential or mixed-use project as defined by Public Resources Code Section 21159.28(d).
- 5. The Proposed Project incorporates all relevant and feasible mitigation measures, performance standards, or criteria set forth in the prior environmental reports, including the RTP/SCS Program Environmental Impact Report.
- 6. All potentially significant or significant effects required to be identified and analyzed pursuant to the California Environmental Quality Act (CEQA) have been identified and analyzed in an initial study; and
- 7. 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 an SCEA as authorized pursuant to Public Resources Code Section 21155.2(b).

1.7 ORGANIZATION OF THE SCEA

This SCEA is organized into the following sections:

Section 1.0: Introduction provides introductory information about the Project.

Section 2.0: Project Description provides a detailed description of the Project, including the environmental setting, Project characteristics, related Project information, Project objectives, and environmental clearance requirements.

Section 3.0: Sustainable Communities Environmental Assessment Criteria describes the regulatory background and criteria for the use of a SCEA in completing the CEQA process for this Project.

Section 4.0: 2016–2040 RTP/SCS Program EIR Mitigation Measures identifies all feasible mitigation measures, performance standards, and criteria from the 2016–2040 RTP/SCS Program EIR.

Section 5.0: Initial Study Checklist contains the completed SCEA Initial Study Checklist showing the significance level under each environmental impact category.

Section 6.0: Sustainable Communities Environmental Analysis contains an assessment and discussion of impacts associated with each environmental issue identified in the Initial Study Checklist

In addition, the **Appendices** include Project-specific reports and data used to support the analysis in this Initial Study.

2.1 PROJECT LOCATION

The Project site is located within the Central City Community Plan area of downtown Los Angeles, as shown in **Figure 2.0-1: Regional Location Map**. The Project site encompasses an area of approximately 160,140 sq. ft. (3.68 acres) and is bound by Figueroa Street to the northwest, Third Street to the northeast, Fourth Street to the southwest, and Flower Street to the southeast, as shown in **Figure 2.0-2: Project Location Map**. The Project site comprises Assessor's Parcel Numbers (APN) 5151-011-020, -021, -022, -023, -024, -025, -026, -027, -028, -029, -030, -031, -032, -033, -034 and -035. Current addresses associated with the Project site are 350 and 356 South Figueroa Street, 830 West 3rd Street, 825 West 4th Street, and 333, 335, and 361 South Flower Street, Los Angeles, CA 90071.

2.2 EXISTING SITE CONDITIONS

The Project site is currently developed with the World Trade Center building, which contains 330,000 square feet of floor area, and was constructed in 1974.⁹ The building consists of a 5-story above-grade commercial and parking structure podium with a commercial office building rising an additional 8 stories at its southeastern corner. The site is currently improved for office, retail, educational, and parking uses. Landscaping on the Project site is characterized by ornamental landscaping on the podium rooftop and street trees in the public rights-of-way bordering the site. There are three levels of subterranean parking and three levels of above grade parking. The site currently contains approximately 1,622 parking spaces. There are driveways providing parking access along Figueroa, Flower and Third Streets. In addition, the building includes pedestrian access via above ground pedway bridges connecting to adjacent properties and a usable rooftop podium with six tennis courts.

2.3 REGULATORY SETTING

The Project site is located within the boundaries of the following jurisdictional areas and subject to the respective requirements thereof:¹⁰

- Central City Community Plan area;
- Bunker Hill Specific Plan area;
- Greater Downtown Housing Incentive Area as defined in the Los Angeles Municipal Code (LAMC Section 12.22 A,29 and C,3);
- Downtown Center Business Improvement District;

⁹ City of Los Angeles, ZIMAS, "Parcel Profile Report," accessed September 2019, zimas.lacity.org.

¹⁰ City of Los Angeles, ZIMAS, "Parcel Profile Report," accessed September 2019, zimas.lacity.org.

- Los Angeles State Enterprise Zone as designated by City Council resolution for areas provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services;
- Transit Priority Area pursuant to Senate Bill (SB) 743;
- High Quality Transit Area as designated by the Southern California Association of Governments (SCAG) for areas within a half-mile of a major rail transit or bus stop (as defined by Section 21064.3 of the Public Resources Code) where lines have peak headways of less than 15 minutes;
- Freeway Adjacent Advisory Notice area;
- Los Angeles County Metropolitan Transportation Authority (Metro) right-of-way (ROW) Project area;
- Los Angeles City Council District 14;
- Downtown Los Angeles Neighborhood Council; and
- Downtown Design Guide area.

The Project site is not located within a CRA/LA Project Area.

Los Angeles Municipal Code

The Project site is zoned C4-4D (Regional Center Commercial), as shown in **Figure 2.0-3: Zoning Map**. The C4 zone permits a range of commercial and residential uses by right, including commercial retail establishments, medical clinics, food markets, restaurants, theaters, hotels, broadcasting studios, parking structures, retail with limited manufacturing, retail contractor business, churches, schools, and residential uses (single-, double, group and multifamily residential dwellings). The Project site is located within Height District 4, as indicated by the "-4D" attached to the zoning designation, which ordinarily limits the FAR to 13:1 without restriction to building height. However, the "D" limitation (enacted by Ordinance No. 164,307) limits FAR at the Project site to 6:1.

Central City Community Plan

The Central City Community Plan area is located south of Sunset Boulevard/Cesar Chavez Avenue, north of the Santa Monica Freeway (Interstate 10), east of the Harbor Freeway (110 Freeway) and west of Alameda Street, as shown in **Figure 2.0-4: Central City Community Plan Map**. It is bordered by the communities of Central City North, Silver Lake-Echo Park, Westlake, Southeast and South Los Angeles. The Plan area is composed of nine districts: Civic Center, Bunker Hill, Financial Core, Convention Center/Arena, South Park Center City/Historic Core, Little Tokyo, Central City East, and South Markets. The Community Plan was developed in the context of promoting a vision of the Central City area as a community that:¹¹

¹¹ City of Los Angeles, *Central City Community Plan II-2*, January 8, 2003, https://planning.lacity.org/complan/pdf/CCYCPTXT.PDF, accessed June 6, 2019.



FIGURE 2.0-1



Regional Location Map



SOURCE: Google Earth - 2020

FIGURE **2.0-2**



Project Location Map



SOURCE: ZIMAS - 2020

FIGURE 2.0-3



Zoning Map



SOURCE: ZIMAS - 2020

FIGURE **2.0-4**



Central City Community Plan Map

- Creates residential neighborhoods while providing a variety of housing opportunities with compatible new housing;
- Improves the function, design, and economic vitality of the commercial districts;
- Preserves and enhances the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance;
- Maximizes the development opportunities of the future rail transit system while minimizing adverse impacts; and
- Plans the remaining commercial and industrial development opportunity sites for needed job producing uses that improve the economic and physical condition of the Central City Community.

Bunker Hill Specific Plan

The Bunker Hill Specific Plan was adopted in 2013, and includes an area generally bound by the Harbor Freeway (110 Freeway) to the west, First Street to the north, Hill Street to the east, and portions of Fourth and Fifth Streets to the south. The Specific Plan is intended to:

- Implement the Central City Community Plan;
- Create a mixed-use district with expanded housing opportunities and commercial retail to create a 24-hour downtown environment;
- Retain and expand the area as the primary office center for the region;
- Reinforce and enhance the district's identity as the cultural center of the region;
- Expand the economic base of the City by providing additional employment opportunities and additional revenues to the region;
- Implement design regulations that maintain a high-quality built form and encourage compatible infill development that enlivens the streets and public spaces;
- Expand, integrate, and activate a linked network of public open spaces and pedestrian pathways;
- Support the expansion of the regional transit network through an urban form and mix of land uses that support high levels of transit use;
- Create a transit-friendly environment by requiring conformance to pedestrian-oriented design guidelines that promote consistent street walls and active ground floor uses;
- Ensure that private development implements special street standards developed for the area;
- Support the improvement of the business environment by providing an attractive public realm; and
- Promote increased flexibility in the regulation of the height and bulk of buildings as well as the design
 of sites and public streets in order to ensure a well-planned mix of commercial and residential uses
 with adequate public space.¹²

¹² City of Los Angeles, *Bunker Hill Community Plan*, pg. 3, 2013, https://planning.lacity.org/complan/specplan/pdf/BunkerHill.pdf, accessed June 11, 2019

2.4 SURROUNDING LAND USES

The Project site is located in the Bunker Hill area of Downtown Los Angeles, an area dominated by highrise commercial office buildings and skyscrapers developed with park-like plazas,¹³ as well as residential high-rise buildings. Surrounding land uses are as follows:

North: Properties to the north and northwest are designated for Regional Center Commercial land uses and contain mid- and high-rise office and residential buildings. Multiple Dwelling Residential (R5-4D) uses are located northeast of the Project site across 3rd Street, including the Bunker Hill Towers residential high-rise buildings. Additionally, properties adjacent to 3rd Street west of South Figueroa Street and associated with the 110 Freeway are designated for Public Facilities uses and zoned PF-1.

East: Commercial office high-rise buildings are located east of the Project site, including the 55-story Bank of America Financial Center and plaza across South Flower Street. Additionally, located northeast of the South Flower Street and 3rd Street intersection is the under-construction Grand Avenue Arts/Bunker Hill station, a future subterranean light rail subway station on Metro's Gold and Expo Lines.

South and West: Properties located to the south and west of the Project site are designated for Regional Center Commercial (C4-4D) uses and contain primarily high-rise hotel buildings, including the L.A. Grand Hotel Downtown mid-rise building and the 35-story Westin Bonaventure Hotel & Suites. Further west is the 40-story Union Bank Plaza at the western corner of the South Figueroa Street and 4th Street intersection. Additionally, properties adjacent to 4th Street west of South Figueroa Street and associated with the 110 Freeway are designated for Public Facilities (PF-1) uses 4th Street is elevated adjacent to the Project site with ramps connecting South Figueroa Street and Flower Street to Hope Street.

Pedestrian bridges across South Figueroa Street, Flower Street, 3rd Street and 4th Street connect the existing building on the site with the buildings located across these streets from the Project site.

2.5 ACCESS

Regional Vehicular Access

Primary regional access to the Project site via automobile is provided by the 110 Freeway, which runs in a northeast–southwest direction approximately 400 feet west of the Project site. Additional regional access to the Project site is provided by the U.S Route 101 (US 101), which generally runs in an east–west direction approximately 0.6 miles north of the Project site.

¹³ City of Los Angeles, *Central City Community Plan*, I-3, January 8, 2003, https://planning.lacity.org/complan/pdf/CCYCPTXT.PDF, accessed September, 2019.

Local Street Access

Local street access is provided by the following streets:

Figueroa Street: Figueroa Street is a one-way northbound street located immediately west of the Project site. It is classified as a Boulevard II north of Wilshire Boulevard, a Modified Avenue I between Wilshire Boulevard and 7th Street and an Avenue I between 7th Street and 9th Street. In the vicinity of the Project site, Figueroa Street generally provides northbound travel lanes. There is a bike lane on Figueroa Street throughout the study area. On-street metered parking is provided during off-peak hours at certain locations with some restrictions. North of 3rd Street, Figueroa Street is a two-way street with two northbound and two southbound lanes and a northbound bike lane.

The City completed the Figueroa Corridor Streetscape Project between 7th Street south to Martin Luther King. Blvd in August 2018. This project included improvements to create a complete, multimodal street to accommodate pedestrians, bicyclists, transit riders, automobiles, and transit. The primary improvements north of 8th Street included additional bicycle facilities.

Flower Street: Flower Street is located immediately east of the Project site. Flower Street is a two-way street north of 4th Street with three travel lanes southbound and one travel lane northbound adjacent to the Project site. South of 4th Street, Flower Street is a one-way street and has four travel lanes southbound. In the City's Mobility Plan 2035, Flower Street is classified as an Avenue II between 3rd Street and 1st Street, Avenue I between 6th Street and 3rd Street and a Modified Avenue II between 6th Street and 11th Street. On-street metered parking is provided on both sides of the street with some restrictions.

Hope Street: Hope Street is a two-way street located east of the Project site. It is classified as a Modified Avenue I north of 4th Street, a Modified Avenue III between 5th Street and 6th Street, and an Avenue II south of 6th Street. Hope Street provides two-travel lanes in each direction north of 6th Street. On-street metered parking is provided on both sides of the street with some restrictions.

<u>Grand Avenue</u>: Grand Avenue is located east of the Project site and is a two-way street north of 5th Street and a one-way southbound street south of 5th Street. In the vicinity of the Project site, Grand Avenue generally provides two travel lanes in each direction. In the City's Mobility Plan 2035, it is classified as a Modified Boulevard II north of 4th Street and a Modified Avenue II south of 4th Street. On-street metered parking is provided with some restrictions.

<u>Olive Street</u>: Olive Street is located east of the Project site and is a two-way street north of 5th Street and a one-way northbound street south of 5th Street. In the vicinity of the Project site, Olive Street generally

2.0-9

provides two travel lanes in each direction. In the City's Mobility Plan 2035, it is classified as a Modified Avenue II. On-street metered parking is provided with some restrictions.

<u>Hill Street</u>: Hill Street is a two-way street located east of the Project site, generally providing two southbound travel lanes and two northbound travel lane in the vicinity of the Project. In the City's Mobility Plan 2035, it is classified as a Modified Avenue II. On-street metered parking is provided with some restrictions.

<u>**3rd Street</u>**: 3rd Street is predominantly a one-way westbound street located immediately north of the Project site, providing six westbound lanes between South Flower Street and South Figueroa Street. Adjacent to the Project site, it also has one travel lane in the eastbound direction, between Figueroa Street and Flower Street. The eastbound direction is forced to turn right at Flower Street to head southbound toward 4th Street. Between Hill Street and Flower Street, 3rd Street runs in tunnel below the ground and therefore does not have intersections with Olive Street, Grand Avenue or Hope Street. In addition to the tunnel, there is a section of 3rd Street between Hope Street and Grand Avenue at grade which provides a turn lane in each direction. In the City's Mobility Plan 2035, it is classified as an Avenue II west of Figueroa Street, a Modified Boulevard II between Figueroa Street and Flower Street, a Modified Avenue II between Figueroa Street and Hope Street, and a Modified Avenue III east of Hope Street. On-street parking is provided is some areas with some restrictions.</u>

<u>**4th Street</u>**: 4th Street is predominantly a one-way eastbound street running across Bunker Hill on a gradeseparated viaduct between Beaudry Avenue and Olive Street. This viaduct does not intersect with Figueroa Street, Flower Street, Hope Street or Grand Avenue, although there are slip-ramps to these streets (It also intersects with lower Grand Avenue). In the immediate vicinity of the Project site, slip-ramps connect from Figueroa Street and Flower Street to Hope Street.</u>

<u>1st Street</u>: 1st Street is a two-way street providing two travel lanes and a bike lane in each direction north of the Project site. In the City's Mobility Plan 2035, it is classified as a Boulevard II. On-street metered parking is provided with some restrictions.

<u>2nd Street</u>: 2nd Street is a two-way street providing one travel lane in each direction north of the Project site. 2nd Street runs in a tunnel between Figueroa Street and Hill Street. In the City's Mobility Plan 2035, it is classified as an Avenue II west of Figueroa Street and a Modified Avenue III east of Figueroa Street. One-street parking is generally restricted.

<u>5th Street</u>: 5th Street is a one-way westbound street located south of the Project site. In the vicinity of the Project site, 5th Street provides five to six travel lanes. In the City's Mobility Plan 2035, it is classified as an

Avenue I west of Flower Street and a Modified Avenue II east of Flower Street. One-street parking is generally restricted.

<u>6th Street</u>: 6th Street is a one-way eastbound street located south of the Project site. In the vicinity of the Project site, 6th Street provides four to five travel lanes. In the City's Mobility Plan 2035, it is classified as a Modified Avenue I west of Flower Street and a Modified Avenue III east of Flower Street. One-street parking is generally restricted.

Public Transit

The Project site is located in downtown Los Angeles, the hub of the regional transit system in the Los Angeles area, thus is well served by transit. The "Project Area," defined as the area within approximately one quarter mile of the Project site, is currently served by a total of seven local and inter-city transit operators. The Los Angeles County Metropolitan Transportation Authority (Metro) operates the Silver Line, three Rapid bus lines, four Express lines and eighteen local lines in the Project Area. Additional transit lines include eight Los Angeles Department of Transportation (LADOT) Commuter Express lines, three City of Montebello bus lines, three LADOT DASH bus lines, two Orange County Transportation Authority bus lines, eight Foothill Transit bus lines, one Santa Monica Big Blue Bus line, and one Torrance Transit bus line operating in the Project Area. The Silver Line operates daily with average headways of 5 minutes or less during the weekday AM and PM peak hours. The three Metro Rapid bus lines operate daily with average headways of 15 minutes or less during weekday AM and PM peak hours.

The Metro Red/Purple Lines also provide proximate service to the Project site; the nearest stations are the 7th Street Metro Center station, approximately 0.35 miles to the southwest; the Pershing Square station, approximately 0.35 miles to the southeast; and the Civic Center/Grand Park station, approximately 0.4 miles east. Additionally, the Metro Grand Avenue Arts/Bunker Hill station is an under-construction at the intersection of South Flower Street and 2nd Street, approximately 0.1 miles northeast of the Project site. This station is being constructed as part of the Regional Connector Transit Project which, when completed, will connect the Little Tokyo/Arts District Station with the 7th Street/Metro Center Station in downtown Los Angeles following a route underneath 2nd Street and Flower Street.

2.6 **PROJECT CHARACTERISTICS**

The subject of this Sustainable Communities Environmental Assessment (SCEA) is the redevelopment of the southwest corner ("Development Site") of the Project site as shown in **Figure 2.0-5: Proposed Site Plan**. The Project includes the demolition of a portion of the existing structure at the Development Site and construction of a new, 41-story residential building integrated into the existing structure on the Project

¹⁴ See Appendix F of this Initial Study.

site. The overall Project site is approximately 160,000 square feet in area and includes approximately 330,000 square feet of existing floor area. The Project would demolish 29,500 square feet of the existing structure containing office space at levels 4 and 5 and add approximately 624,500 square feet of new residential floor area for a net combined 925,000 square feet of floor area. Approximately 390 existing parking spaces would be demolished, and 155 new spaces provided for a total of 1,387 spots. The residential building would be a maximum of 480 feet in height and contain 570 units, as shown in **Figure 2.0-6: Project Rendering**.

As summarized in Table 2.6-1: Summary of Project Program, the Project would utilize the three existing subterranean levels and three above ground levels for parking, storage, and building operations. The ground floor would include a residential lobby, lounge, and building operations spaces, in addition to improved pedestrian amenities and an activated street frontage, as shown in Figure 2.0-7: Floor Plan— Level 1. Levels 2 and 3 would include parking and storage space, in addition to residential units on Level 3, as shown in Figure 2.0-8: Floor Plan—Level 2 and Figure 2.0-9: Floor Plan—Level 3. Level 4 would include residential units, an entertainment room, and a connection to the existing pedestrian footbridge across South Figueroa Street, as shown in Figure 2.0-10: Floor Plan-Level 4. Level 5 would include residential units and community spaces, including a business meeting center and storage area, as shown in Figure 2.0-11: Floor Plan—Level 5. Level 6 would include an amenity and pool deck with gym, lawn area, seating and dining areas, and sports facilities integrated with three tennis courts on the existing podium roof, among other amenities, as shown in Figure 2.0-12: Floor Plan—Level 6. Levels 7 through 40 would include a mix of 1-, 2-, and 3-bedroom residential units, as shown in Figure 2.0-13: Floor Plan— Level 7-38 and Figure 2.0-14: Floor Plan—Level 39-40. Level 41 would include a rooftop amenity deck with seating areas, lawn space, and private garden, indoor amenity and meeting spaces, and residential units, as show in Figure 2.0-15: Floor Plan—Level 41.

The Project would provide open space for the Project site as required by LAMC Section 12.21.G.2. Based on the number of units and the mix of unit types, approximately 61,300 square feet of open space would be provided. Approximately 59,400 square feet of common indoor and outdoor open space is proposed, which includes space for landscaping and 1,900 square feet dedicated for private balconies. The Project would comply with the City of Los Angeles Landscape Ordinance by including 143 trees within the Project site and adjacent rights-of-way. The Project also includes green space, landscaping, and recreational amenities on three levels of the proposed building: the ground floor, Level 6 podium roof, and Level 41 rooftop deck.

The Project is designed in conformance with the scale, massing, and character of surrounding development. The Floor Area Ratio (FAR) of the Project would be 5.8:1. The Project building would be designed in a modern architectural style.



SOURCE: CALLISON RTKL, INC. - 2018

FIGURE **2.0-5**



Proposed Site Plan



SOURCE: CALLISON RTKL, INC. - 2018

FIGURE **2.0-6**



Project Rendering



FIGURE **2.0-7**



Floor Plan—Level 1





Floor Plan—Level 2



FIGURE **2.0-9**



Floor Plan—Level 3





Floor Plan—Level 4



SOURCE: CALLISON RTKL, INC. - 2018

FIGURE 2.0-11



Floor Plan—Level 5





Floor Plan—Level 6



SOURCE: CALLISON RTKL, INC. - 2018

FIGURE 2.0-13



Floor Plan—Level 7-38



SOURCE: CALLISON RTKL, INC. - 2018

FIGURE 2.0-14



Floor Plan—Level 39-40





Floor Plan—Level 41

The exterior would consist predominantly of aluminum panel, metal louvre, limestone, stucco, vision and tampered glass, and LED lighting. The subterranean levels would consist of concrete walls and floors. The scale and massing for the Project are shown in **Figure 2.0-16: North and East Elevation** and **Figure 2.0-17: South and West Elevation**.

Level	Uses
Basement 1-3	Automobile parking, storage and building operations
1	Residential lobby, lounge, loading and building operations
2	Automobile and bicycle parking
3	Lower level of 5 duplex residential units, 5 flex residential units; parking and storage space
4	Upper level of 5 duplex residential units, 6 flex residential units, residential entertainment room, storage, existing office space, and connection to existing pedestrian footbridge across South Figueroa Street
5	9 residential units and amenity spaces, including a business meeting center, pet grooming, and storage
6	8 residential units, residential amenities including gym, lounge and dining area, lawn area, and outdoor pool deck
7-38	16 residential units per floor
39-40	10 residential units per floor
41	3 residential units, residential lounger, and outdoor rooftop amenity deck

Table 2.6-1 Summary of Project Program

The Project would provide parking consistent with the LAMC and the Bunker Hill Specific Plan, including approximately 1,387 automobile parking spaces, as well as bicycle parking spaces in accordance with LAMC requirements. The existing ingress/egress driveways and circulation along Figueroa Street and Flower Street will be retained for the proposed Project.

2.7 APPROVAL ACTIONS

To entitle the project, the applicant has requested that the Director of Planning approve Project Permit Compliance pursuant to LAMC Section 11.5.7 C of the Bunker Hill Specific Plan.

In addition to the entitlements identified above, the following approvals may be also required from the City, including, but not limited to, approvals and permits from the City's Department of Building and Safety, Public Works, and other City Departments including, but not limited to the following: demolition, haul route, excavation, shoring, grading, foundation, building and interior improvements and the removal of trees on public and/or private property.

2.8 CONSTRUCTION

Construction of the proposed Project is expected to last approximately 39 months. It is anticipated to begin in 2020 and continue through 2023. Construction activities would fall into four principal phases: (1) site preparation and demolition; (2) building foundation; (3) structure construction: and (4) exterior & interior finishing. Excavation required for the construction of the Project is estimated at 30,000 cubic yards and 30 ft. in depth. The planned construction traffic would utilize the SR-110 Harbor Freeway via the 2nd and 3rd Street exits and minimize the use of surface streets.

During construction some building operations would be temporarily affected. Approximately 842 parking spaces would be available during construction, 130 spaces on each level of the 6 parking levels would be affected during demolition and construction work. The Figueroa Street elevator would be closed during construction, as would the sidewalk abutting the Project Site along Figueroa Street and 4th Street. The Figueroa Street pedestrian bridge would be closed for the duration of construction. The 4th Street pedestrian bridge may be intermittently closed during construction. The 3rd Street and Flower Street sidewalks at the Project perimeter, as well as the Figueroa Street sidewalk north of the Project Site, would remain open during construction. Furthermore, the 3rd Street and Flower Street pedestrian bridges would remain open during construction.

Currently, there are three vehicular access driveways on Figueroa Street that provide vehicular access for onto the Project site. The southernmost driveway is anticipated to be closed for the duration of construction. The northernmost driveway would be open during construction. The Flower Street and Third Street driveways would remain open during construction.



SOURCE: CALLISON RTKL, INC. - 2018

FIGURE 2.0-16



North and East Elevation


SOURCE: CALLISON RTKL, INC. - 2018

FIGURE 2.0-17



South and West Elevation

224-001-18

3.1 CONSISTENCY FINDINGS

As explained below, the proposed Project complies with the requirements of CEQA for using a SCEA as authorized pursuant to PRC Section 21155.

RTP/SCS Consistency

PRC Section 21155(a) states that a SCEA is only applicable for a Transit Priority Project that 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 applicable metropolitan planning organization, in this case the Southern California Association of Governments (SCAG).

SCAG is the applicable Metropolitan Planning Organization ("MPO") for the Project site. As such, under SB 375, SCAG developed the applicable SCS governing the Project site, the SCAG 2016 RTP/SCS, adopted on April 7, 2016. On 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 a culmination of a multiyear effort involving stakeholders from across the SCAG Region. The 2016–2040 RTP/SCS is intended to balance the Southern California region's future mobility and housing needs with economic, environmental, and public health goals. On June 28, 2016, ARB accepted SCAG's quantification of GHG emission reduction 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 ARB.¹⁵

Use Designation, Density, and Building Intensity

As part of its requirement to be designated as a transit priority project under SB 375, the Project is consistent with the applicable general land use designation, density, and building intensity categories and requirements outlined in the SCAG 2016–2040 RTP/SCS. The Project site is located within the Central City Community Plan Area, a highly urbanized area within downtown Los Angeles in an area dominated by high-rise buildings and dense commercial and residential uses. The Project site is within an area designated by the 2016–2040 RTP/SCS as "Urban," a land development category (LDC) with the highest density and intensity of land development under the 2016–2040 RTP/SCS. The 2016–2040 RTP/SCS identifies the Project area as an Urban LDC in both 2012 and 2040.¹⁶ The 2016-2040 RTP/SCS describes the Urban Land Development Category as:

¹⁵ ARB Executive Order G-16-066.

¹⁶ SCAG, 2016-2040 RTP/SCS.

These areas are often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (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 well-connected 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.¹⁷

The Project would be consistent with the Urban LDC. The Project site is an infill multifamily residential project located within one of the most highly urbanized areas in the City of Los Angeles. Further, the Project site is located within a High Quality Transit Area (HQTA) as determined by SCAG¹⁸ and a Transit Priority Area¹⁹ under SB 743. These are areas served by a variety of transit opportunities and alternative modes of transportation and thus promote a well-connected, highly walkable environment. As mentioned previously, Metro operates the Silver Line, three Rapid bus lines, four Express lines, and eighteen local lines in the Project Area. Additional transit lines include eight LADOT Commuter Express lines, three Montebello bus lines, three LADOT DASH bus lines, two Orange County Transportation Authority bus lines, eight Foothill Transit bus lines, one Big Blue Bus line and one Torrance bus line operating in the Project Area. As such, the Project's future residents, patrons, and guests would have immediate access to convenient, reliable transit, including for individuals who choose not to own or use personal automobiles.

The 2016-2040 RTP/SCS describes HQTAs as areas that may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Project would develop a new, 41-story multiple dwelling residential building containing 570 units and would promote pedestrian and bicycling activity by providing an activated street frontage with pedestrian amenities such as landscaping, outdoor seating areas, street furniture, and a ground floor with greater transparency than the current condition. Further, the Project, in accordance with the City's bicycle parking ordinance (see LAMC Section 12.21.A.16), including 240 long-term and 23 short-term bicycle parking spaces. The Project would provide 155 new automobile parking spaces consistent with LAMC and Bunker Hill Specific Plan requirements, including available LAMC reductions for the provision of bicycle parking spaces. With approximately 1,232 existing automobile parking spaces and the 155 new spaces, the total on-site parking would be 1,387 spaces.

¹⁷ Southern California Association of Governments, *Final 2016–2040 Regional Transportation Plan/Sustainable Communities* Strategy, adopted April 2016, Chapter 2, 'Where We Are Today',

http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_02_WhereWeAreToday.pdf, page 20, accessed August 2019. SCAG, *High Quality Transit Areas (HQTA) 2040 – SCAG Region*, http://gisdata-

scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-119.935%2C33.582%2C-116.229%2C34.379, accessed October 19, 2018.

¹⁹ City of Los Angeles, ZIMAS, "Parcel Profile Report," zimas.lacity.org, accessed September 2019.

The 2016–2040 RTP/SCS includes various urban footprint place types for transit priority projects, including mixed use, residential, commercial, office, research, and development, industrial, civic, and open space. The Project is consistent with the "Urban Residential" place type within the urban land development category. 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 multifamily. The average total net Floor Area Ratio (FAR) is 9.0, floors range from 5 to 60 feet, and the gross density ranges from 0 to 50+ employees per acre and 75 to 500+ households per acre.²⁰

Based on the Central City Community Plan Area's current household size (e.g., an average of 1.89 persons per multifamily household for the Central City Community Plan area),²¹ the construction of 570 new multifamily residential dwelling units would result in an estimated increase of approximately 1,077 new residents in the Bunker Hill and downtown area. Conservatively assuming all of the approximately 1,077 residents would come from outside the City of Los Angeles, the proposed increase in housing units and population would be consistent with and well within SCAG's forecasted growth of approximately 364,800 households and approximately 763,900 persons in the City of Los Angeles between 2012 and 2040.²²

Applicable Policies Specified for the Project Area

As discussed in **Section 4.0: Initial Study** of this SCEA, the Project is consistent with SCAG's growth projections for the City of Los Angeles, which supports the conclusion that the Project is consistent with SCAG policies. The Project would be consistent with applicable goals and policies presented within SCAG's 2016-2040 RTP/SCS, as shown in **Table 3.1-1: Consistency Analysis 2016–2040 RTP/SCS**, below.

Goals, Strategies, and Actions	Consistency Analysis
2016-2040 RTP/SCS Goal 1 : Align the plan investments and policies with improving regional economic development and competitiveness.	Not Applicable . This goal is directed towards SCAG and the City of Los Angeles (City) and would not apply to the Project. The Project would not be inconsistent with meeting this goal.

 Table 3.1-1

 Consistency Analysis 2016–2040 RTP/SCS

²⁰ Southern California Association of Governments, 2016-2040 RTP/SCS Background Documentation, 'Place Types Categorized Into Land Development Categories (LDCs)'; SCAG 2016-2040 RTP/SCS, Urban Footprint Place Types, http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_SCSBackgroundDocumentation.pdf, accessed August, 2019; see also "Place Types Categorized into Land Development Categories," available at http://scagrtpscs.net/Documents/2016/supplemental/LDC_PlaceType.pdf, accessed August 2019.

²¹ City of Los Angeles, Central City Community Plan.

²² SCAG, 2016-2040 RTP/SCS Demographics and Growth Forecast Appendix, Table 11, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf, accessed August 2019.

Goals, Strategies, and Actions	Consistency Analysis
2016-2040 RTP/SCS Goal 2 : Maximize mobility and accessibility for all people and goods in the region.	Consistent . The Project site is in a highly urbanized area in the City within a High Quality Transit Area (HQTA) and a Transit Priority Area (TPA). The Project would develop 570 residential units, including 9 studio units, 403 one-bedroom units, 151 two-bedroom units, and 7 three-bedroom units, attracting a diverse range of potential residents.
	The Project Area is currently served by a total of seven local and inter-city transit operators. The Los Angeles County Metropolitan Transportation Authority (Metro) operates the Silver Line, three Rapid bus lines, four Express lines and eighteen local lines in the Project Area. Additional transit lines include eight Los Angeles Department of Transportation (LADOT) Commuter Express lines, three City of Montebello bus lines, three LADOT DASH bus lines, two Orange County Transportation Authority bus lines, eight Foothill Transit bus lines, one Santa Monica Big Blue Bus line, and one Torrance Transit bus line operating in the Project Area.
	The Metro Red/Purple Lines also provide proximate service to the Project site; the nearest stations are the 7th Street Metro Center station, approximately 0.35 miles to the southwest; the Pershing Square station, approximately 0.35 miles to the southeast; and the Civic Center/Grand Park station, approximately 0.4 miles east.
	Additionally, the Metro Grand Avenue Arts/Bunker Hill station is under-construction at the intersection of Flower Street and 2nd Street, approximately 0.1 miles northeast of the Project site. This station is being constructed as part of the Regional Connector Transit Project which, when completed, will connect the Little Tokyo/Arts District Station with the 7th Street/Metro Center Station in downtown Los Angeles following a route underneath 2nd Street and Flower Street.
2016-2040 RTP/SCS Goal 3 : Ensure travel safety and reliability for all people and goods in the region.	Not Applicable/Consistent . While not necessarily applicable on a project-specific basis, the Project would support this goal by improving local access to alternative forms of transportation, coupled with appropriate design considerations to ensure travel safety, reliability, and activation of street frontages in a manner that would promote alternative forms of transportation. Specifically, the frontage of the Project along Figueroa Street would feature improved sidewalks with wider pedestrian space and additional landscaping. By enabling a diverse modal split for future residents and visitors in light of its location, the Project would help to indirectly ensure that respective transportation systems are more timely, reliable, and safe. The Project would be consistent with SCAG, County, and City efforts in reaching this goal.
2016-2040 RTP/SCS Goal 4 : Preserve and ensure a sustainable regional transportation system.	Not Applicable/Consistent . While not necessarily applicable on a project-specific basis, the Project would support this goal by improving the viability of alternative forms of transportation

Goals, Strategies, and Actions	Consistency Analysis
	through higher density development, heightened walkability, and additional bicycle infrastructure. A variety of alternative transportation options would help to ensure the mobility needs of residents and visitors are met while promoting the development and sustainability of a more robust and sustainable regional transportation system. The Project would be consistent with SCAG, County and City efforts in reaching this goal.
2016-2040 RTP/SCS Goal 5: Maximize the productivity of our transportation system.	Consistent . As stated above, the Project would place 570 new multifamily residential units in proximity to a variety of alternative transportation options, serving to encourage that future residents and visitors utilize these options and diversify the local/regional modal split. The Project's promotion of the use of a range of transportation modes would work to facilitate a more productive transportation system. Moreover, as discussed in the Traffic Study, the Project would have less than significant traffic and transportation impacts at all intersections within the study area, Project site access points, and on the transit system. The Project would be consistent with the City efforts to meet this goal.
2016-2040 RTP/SCS Goal 6 : Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	Consistent . The Project would place new residential units in a HQTA and TPA. The Project site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-and alternative transportation friendly environment. The location of the Project promotes the use of a variety of transportation options, which include walking, biking, and using public transportation. Further, the Project would activate street frontages on the ground floor of the building and introduce new landscaping, seating areas, and street furniture, encouraging pedestrian activity. As mentioned previously, the Project would include new bicycle infrastructure, including bicycle parking spaces in compliance with LAMC, to encourage bicycle use. Lastly, public transit would facilitate active transportation as riders would be anticipated to walk for a portion of their trip. Furthermore, all of the Project's construction and operational criteria pollutant emissions would be below the SCAQMD construction and operational thresholds and the Project would not result in significant impacts with respect to toxic air contaminants. As such, the Project would be consistent with this goal.
2016-2040 RTP/SCS Goal 7 : Actively encourage and create incentives for energy efficiency, where possible.	Consistent . The Project would comply with the City of Los Angeles Green Building Code, the California Green Building Standards Code (CALGreen), and would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought-tolerant planting, and high-performance building envelopment consistent with this goal.

Goals, Strategies, and Actions	Consistency Analysis
2016-2040 RTP/SCS Goal 8 : Encourage land use and growth patterns that facilitate transit and active transportation.	Consistent . As stated above, the Project site is located in a highly urbanized area of the City of Los Angeles within a HQTA and a TPA and would serve to integrate land use and transportation strategies. The Project site is well served by mass transit with generally frequent service intervals during peak commute periods, including a total of seven local and inter-city transit operators with a total of 32 bus stops within two blocks of the site. The proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. As such, the location of the Project site would encourage a variety of transportation options consistent with this goal.
2016-2040 RTP/SCS Goal 9 : Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Not Applicable . This goal is directed towards the SCAG region to ensure the safety and security of the regional transportation system. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Guiding Policy 1 : Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	Not Applicable . This policy is directed towards SCAG in allocating transportation investments rather than individual development projects. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Guiding Policy 2 : 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.	Not Applicable . This policy is directed towards SCAG in allocating transportation system funding. The Project would contribute to a safe, well-maintained, and efficient multimodal transportation system. As discussed in the Transportation Study, the Project would result in less than significant impacts at the study intersections. ²³ The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Guiding Policy 3 : RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	Not Applicable . This policy is directed towards SCAG and the City of Los Angeles and does not apply to the proposed Project. The Project site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment and smart growth principles outlined under SB 375 and applicable regulations.
2016-2040 RTP/SCS Guiding Policy 4 : Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	Not Applicable . This policy is directed towards transportation investment by SCAG. However, the Project's location within a TPA promotes the use of public transit and pedestrian activity. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Guiding Policy 5 : HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	Not Applicable . The policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare. Nevertheless, the Project's location in a HQTA and TPA would facilitate greater use of public transit and pedestrian activity. The Project would not be inconsistent with meeting this goal.

²³ See Appendix F of this Initial Study.

Goals, Strategies, and Actions	Consistency Analysis
2016-2040 RTP/SCS Guiding Policy 6 : The RTP/SCS will support investments and strategies to reduce nonrecurrent congestion and demand for single-occupancy vehicle use, by leveraging advanced technologies.	Not Applicable . This policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single-occupancy vehicles. However, the Project would support the policy as it is located within a TPA and would support public transportation and other alternative methods of transportation. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Guiding Policy 7 : The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run	Not Applicable . This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Guiding Policy 8 : Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.	Not Applicable . This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Land Use Policy 1 : Identify regional strategic areas for infill and investment.	Not Applicable . This policy is directed towards SCAG and would not necessarily apply to the Project. Nevertheless, the Project site is located within a SCAG-designated High Quality Transit Area (HQTA) and Transit Priority Area (TPA), as defined by PRC Section 21099, and would construct a high-density infill use at an underutilized infill site.
2016-2040 RTP/SCS Land Use Policy 2 : Structure the plan on a three-tiered system of center development. ²⁴	Not Applicable . This policy is directed towards SCAG and would not specifically apply to the Project. Nevertheless, the Project site is located in a highlighted developed urban center with robust transportation infrastructure in place. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Land Use Policy 3: Develop "Complete Communities."	Consistent . The Project site's placement of high-density urban infill housing in proximity to a concentration of amenities and activities, including employment, retail, and entertainment, would enable future on-site residents or visitors to make short trips via transit, walking, or biking to meet all of their daily needs within a short distance of the Project site, a key component of the concept behind "complete communities." As such, the Project would be consistent with this goal.
2016-2040 RTP/SCS Land Use Policy 4 : Develop nodes on a corridor.	Not Applicable . This policy is directed towards SCAG and the City in identifying sites and devising a system where development patterns are clustered along higher density transit corridors. The Proposed Project is located within a HQTA and a

²⁴ 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 threetiered 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.

Goals, Strategies, and Actions	Consistency Analysis
	transit-priority area. The Proposed Project's mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Land Use Policy 5 : Plan for additional housing and jobs near transit.	Consistent . The Project would place 570 new residential units in an HQTA and a TPA in proximity to a range of local and intercity transit options.
2016-2040 RTP/SCS Land Use Policy 6 : Plan for changing demand in types of housing.	Consistent . The Project would introduce a range of housing products on site, including 9 studio units, 403 one-bedroom units, 151 two-bedroom units, and 7 three-bedroom units, providing for a range of housing types that would appeal to a variety of individuals and families with the flexibility to meet changing market demands.
2016-2040 RTP/SCS Land Use Policy 7 : Continue to protect stable, existing single- family areas.	Not Applicable . This policy is not applicable to the Project as no existing single-family homes would be removed. Further, the Project site is in the Bunker Hill neighborhood, an area characterized by high density residential development and no nearby single-family zoned areas. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Land Use Policy 8 : Ensure adequate access to open space and preservation of habitat.	Not Applicable . This policy is directed towards SCAG and the City and does not apply to the Project. The Project site is within a highly urbanized area within the City of Los Angeles and does not contain any wildlife habitat of significant value or natural open space. The Project would introduce approximately 61,300 square feet of open space across both indoor and outdoor spaces. Further, the Project is introducing the "Oasis 350 Plan" on three levels of the proposed building: the ground floor, Level 6 podium roof, and Level 41 rooftop deck. A central component of this plan is the provision of green spaces, landscaping, and recreational amenities. Lastly, the Project would comply with the City of Los Angeles Landscape Ordinance by including 143 trees on and in rights-of-way adjacent to the Project site. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Land Use Policy 9 : Incorporate local input and feedback on future growth.	Not Applicable/Consistent . This policy is directed towards SCAG and would not necessarily apply to the Project. Nevertheless, the Project would serve to help meet the City's critical need for additional housing units, especially in transitrich areas, as outlined in the City's <i>General Plan</i> "Housing Element," itself a product of a robust planning effort involving substantial public input and feedback. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Land Use Strategy 1 : Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Consistent . The Project would develop 570 new residential units, increasing housing supply in Downtown Los Angeles. Further, the Project would introduce a range of housing products, including 9 studio units, 403 one-bedroom units, 151 two-bedroom units, and 7 three-bedroom units, attracting a diverse range of potential residents and affordability levels.

Goals, Strategies, and Actions	Consistency Analysis	
	Moreover, the Project would introduce new housing units to an underutilized portion of an existing commercial structure currently used for office use and would thus not result in the displacement of any existing housing units.	
2016-2040 RTP/SCS Land Use Strategy 2 : Focus new growth around transit.	Consistent . As stated above, the Project would introduce a new high-density residential development with 570 residential units to a site located in a highly urbanized area of the City of Los Angeles within a HQTA and a TPA and is well served by transit, including a total of seven local and inter-city transit operators with a total of 32 bus stops within two blocks of the site.	
2016-2040 RTP/SCS Land Use Strategy 3 : Plan for growth around livable corridors, including growth on the Livable Corridors network.	Consistent . SCAG identified strategies for implementing the Livable Corridors concept: transit improvements, active transportation improvements, and land use policies. The Project would be consistent with strategies for implementing the Livable Corridors concept through the Project's introduction of a higher density residential development on an office and auto parking portion of an existing structure, as well as site pedestrian and bicycle infrastructure improvements.	
2016-2040 RTP/SCS Land Use Strategy 4 : Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	Consistent . The Project would introduce a high density residential development in the Downtown Los Angeles neighborhood, an area characterized by its concentration of housing, employment, and mix of retail and services in close proximity to each other, furthering attainment of the "complete communities" concept by enabling future residents to have their daily needs met in close proximity to the Project in a manner that would not necessitate the use of a personal automobile.	
2016-2040 RTP/SCS Land Use Strategy 5: Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Not Applicable . This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.	
2016-2040 RTP/SCS Land Use Strategy 6 : Protect natural and farm lands, including developing conservation strategies.	Not Applicable . This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.	
2016-2040 RTP/SCS Land Use Strategy 7 : Preserve our existing transportation system.	Not Applicable . This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.	
2016-2040 RTP/SCS Land Use Strategy 8 : Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	Not Applicable . This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.	

Goals, Strategies, and Actions Consistency Analysis	
2016-2040 RTP/SCS Land Use Strategy 9 : Promote safety and security in the transportation system.	Not Applicable . This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.
2016-2040 RTP/SCS Land Use Strategy 10 : Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	Not Applicable. This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The proposed project would not interfere with this larger goal of investing in the transportation system.
2016-2040 RTP/SCS Land Use Strategy 11 : Promote zero-emissions vehicles.	Consistent . The Project would comply with the provisions of the Los Angeles Green Building Code and the CALGreen code which include standards for the provision of electric vehicle charging stations capable of supporting future electric vehicle supply equipment. Specifically, the Project would include 30% of code required spaces as EV-ready with conduit and 10% would have installed charging stations.
2016-2040 RTP/SCS Land Use Strategy 12 : Implement shared mobility programs.	Not Applicable . This strategy is directed towards SCAG and the City and does not apply to the Project. The Project would not be inconsistent with meeting this goal.
Benefit 1 : The RTP/SCS will promote the development of better places to live and work through measures that encourage more compact development in certain areas of the region, varied housing options, bicycle and pedestrian improvement, and efficient transportation infrastructure.	Consistent . As discussed above, the Project will introduce 570 new residential units in a HQTA and TPA in an underutilized portion of an infill site current used as vehicle parking. The Project would provide a variety of dwelling units sizes: 9 studio units, 403 one-bedroom units, 151 two-bedroom units, and 7 three-bedroom units. Ground floor pedestrian improvements and added bicycle infrastructure and electric vehicle charging equipment would encourage both alternative and energy-efficient modes of transportation.
Benefit 2 : The RTP/SCS will encourage strategic transportation investments that add appropriate capacity and improve critical road 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.	Not Applicable . Benefit 2 is directed towards SCAG and not does apply to the Project. Nevertheless, the Project is an infill residential project on an underutilized portion of a site located within a HQTA and a TPA in proximity to employment, retail, and entertainment, thereby decreasing time and cost of traveling between places. The Project would not be inconsistent with meeting this goal.
Benefit 3 : The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households.	Consistent . The Project includes numerous energy-efficient design features to comply with the City of Los Angeles Green Building Code and CALGreen. The Applicant has committed to implement additional water conservation measures above those required by code, specifically:
	• High Efficiency Toilets with a flush volume of 1.06 gallons per flush, or less.
	 Showerheads with a flow rate of 1.75 gallons per minute, or less, for residential units only.

Goals, Strategies, and Actions	Consistency Analysis	
	• ENERGY STAR Certified Residential Dishwashers standard with 2.9 gallons/cycle or less	
	 Drip/Subsurface Irrigation (Micro-irrigation) 	
	 Proper Hydro-zoning/Zoned Irrigation-(groups plants with similar water requirements together) 	
Artificial Turf		
	 Drought Tolerant Plants - approximately 75 percent of total landscaping 	
	Further, the Project's location near transit will provide future residents and visitors with various affordable transit options.	
Benefit 4 : Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.	Consistent . The Project would encourage improved access and mobility by introducing 570 new residential units within a transit-rich urban area. Employment, retail, and entertainment surrounding the Project site are easily accessible by foot, bicycle, and transit. The Project would provide approximately 47,000 square feet of outdoor open space including balconies, rooftop garden, and a central green area for large community events. The Project program thus promotes improved placemaking and alternative modes of transportation that would utilize and concentrate new growth in existing an urban area.	

Source: SCAG, 2016–2040 RTP/SCS, April 2016.

Not Applicable: Actions/strategies are those that are not identified for implementation of local jurisdictions. The Project's consistency with any actions/strategies identified for implementation by the local jurisdictions is assessed above.

Residential Floor Area

PRC Section 21155(b) states a SCEA is only applicable for a Transit Priority Project that contains at least 50 percent residential use, based on total building square footage or, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.

The Project includes the removal of approximately 29,500 square feet of an existing 330,000-square-foot commercial building and the provision of a total of approximately 624,500 square feet of residential floor area, for a net total floor area of approximately 925,000 square feet. As such, the percentage of total building square footage that would be for residential uses would be 67%. The Project includes 570 new multifamily residential units and ancillary residential uses and amenities, which would include indoor community space, code-compliant outdoor open space, and related support areas, which collectively would comprise 100 percent of the new building. As such, the Project would be consistent with this criterion.

Residential Density

PRC Section 21155(b) states a SCEA is only applicable for a Transit Priority Project that provides a minimum net density of at least 20 units per acre. The Project site includes an area of approximately 3.68 acres.

The Project includes 570 new multifamily residential units; as such, the Project provides approximately 154.9 dwelling units per acre. As such, the Project would be consistent with this criterion.

Proximity to Transit

PRC Section 21155(b) states a SCEA is only applicable for a Transit Priority Project that is within one-half mile of a major transit stop or a high-quality transit corridor. 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 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 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 PRC Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

The Project area is well served by existing transit services, with multiple bus stops within a few blocks of the Project. Metro Rapid Lines 720 and 760, that operate at less than 15-minute intervals during peak hours, cross at Grand and 5th Streets. The 7th Street/Metro Center Station, at which the A, B, D and E Metro Rail lines meet, is located within ½ mile of the Project. The future Regional Connector Transit Corridor that will connect the Metro Gold Line to the Metro Blue and the Metro Expo Line will have a stop at 2nd Street and Hope Place. Moreover, the 2016-2040 RTP/SCS specifically identifies the Project Site as being within a HQTA. Therefore, the Proposed Project is located within a high-quality transit corridor. The Proposed Project is consistent with this criterion.

4.1 INCORPORATION OF PRIOR MITIGATION MEASURES

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

The Mitigation Monitoring and Reporting Program for the SCAG RTP/SCS PEIR (SCAG MMRP) does not include project level mitigation measures that are required of the Proposed Project. Rather, the SCAG MMRP provides 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 SCAG measures are not prescriptive on the Proposed Project unless the lead agency determines their applicability to the Project based on the circumstances and anticipated environmental impacts.

To comply with PRC Section 21151.2, the City has reviewed all mitigation measures contained in the SCAG MMRP (shown in **Table 4.1-1: Applicability of 2016 – 2040 RTP/SCS Mitigation Measures**) and determined their applicability to the Project. For each such mitigation measure, the City considered whether to use the SCAG MMRP mitigation measure or an equally effective City mitigation measure or federal, State, regional, or City regulation.

Table 4.1-1 Applicability of 2016—2040 RTP/SCS Mitigation Measures

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
Aesthetics		
Scenic Vistas	MM-AES-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 of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, 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 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:	Measures not applicable. The proposed project is in a Transit Priority Area (TPA). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.
	 Use a palette of colors, textures, building materials that are graffitiresistant, and/or plant materials that complement the surrounding landscape and development. Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. Use alternating facades to "break up" large facades and provide visual interest. Design new corridor landscaping to respect existing natural and manmade features and to complement the dominant landscaping of the surrounding areas. Replace and renew landscaping along corridors with road widenings, interchange projects, and rolated improvements. 	
	 Retain or replace trees bordering highways, so that clear-cutting is not evident. 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. 	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	 Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions in 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 disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain. 	
Visual Character	MM-AES-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 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.	Measures not applicable. The proposed project is in a Transit Priority Area (TPA). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.
	 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. Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. 	
	 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. Design projects consistent with design guidelines of applicable general 	
	plans.	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	 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. 	
	 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 abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. 	
Light, glare, shade	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:	Measures not applicable. The proposed project is in a Transit Priority Area (TPA). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.
	 Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. 	
	 Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations. 	
	• Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.	
	 Use unidirectional lighting to avoid light trespass onto adjacent properties. 	
	 Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. 	
	Provide structural and/or vegetative screening from light-sensitive uses.	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	• Shield and direct all new street and pedestrian lighting away from light- sensitive off-site uses.	
	• Use nonreflective glass or glass treated with a nonreflective coating for all exterior windows and glass used on building surfaces.	
	 Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. 	
Agricultural and Forest Res	ources	
Conversion of farmland to nonag uses. Conversion of forest land.	MM-AF-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 conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural 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 Measure not relevant because agricultural and forest land do not exist in the urban infill area where the proposed project is located. Applicability to Proposed Project account project and site-specific considerations as applicable and feasible:	Measure not applicable because agricultural and forest land do not exist in the urban infill area where the proposed project is located.
	• For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966.	
	• Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.	
	• Maintain and expand agricultural land protections such as urban growth boundaries.	
	• Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural	

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	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 (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:	
	 Offers landowners economic incentives to protect natural resources; Saves permitees time and money by providing them with the certainty of pre-approved compensation lands; Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values; Provides for long-term protection and management of habitat; A publicly owned conservation or mitigation bank; Offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance." 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. 	
	in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	 Include underpasses and overpasses at reasonable intervals to maintain property access. 	
	 Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland. 	
	 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. 	
	 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 Section 21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts 	
Zoning for Ag use, Williamson Act Contract	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:	Measure not applicable because agricultural land does not exist in urban infill area where the proposed Project is located

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	• Project relocation or corridor realignment to avoid lands in Williamson Act contracts.	
	• Establish conservation easements consistent 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.	
	 Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable. 	
Air Quality		
Violation of air quality standards.	 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. 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: 	 The Lead Agency has not identified that the Project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation. Nonetheless, the Proposed Project substantially complies with this measure. Demolition, grading, and construction activities must comply with provisions of the SCAQMD District Rule 403, including the following: Apply water to disturbed areas of the site three times a day Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes Appoint a construction relations officer to act
	 Minimize land disturbance Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. Cover trucks when hauling dirt. 	 Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation. Limit soil disturbance to the amounts analyzed in this air quality analysis.
	• Stabilize the surface of dirt piles if not removed immediately.	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	• Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.	 All materials transported off-site shall be securely covered.
	Minimize unnecessary vehicular and machinery activities.	• Apply nontoxic soil stabilizers according to
	• Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.	manufacturers' specifications to all inactive construction areas (previously graded areas inactive for tan days or more)
	 On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. 	 Traffic speeds on all unpaved roads to be reduced to 15 mph or less.
	 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 	• Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.
	construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.	In addition, through modeling of expected pollutant emissions the Lead Agency has identified that the project would not violate an air
	• Ensure that all construction equipment is properly tuned and maintained.	quality standard or contribute substantially to an existing air quality violation. As such this measure
	• 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.	does not apply.
	 Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or on-site renewable electricity generation rather than diesel and/or gasoline powered generators. 	
	• Develop a traffic plan to minimize traffic flow interference from 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.	
	• As appropriate, require that portable engines and portable engine- driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable	

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	Equipment Registration with the State or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.	
	 Implement EPA's National Clean Diesel Program. 	
	• 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.	
	• On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity.	
	• If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines.	
	• Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines.	
	Convert part of the construction truck fleet to natural gas.	
	• Include "clean construction equipment fleet", defined as a fleet mix cleaner than the State average, in all construction contracts.	
	• Fuel all off-road and portable diesel powered equipment with ARB- certified motor vehicle diesel fuel (nontaxed version suitable for use off- road).	
	• Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas.	
	• Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner off-road heavy-duty diesel engines and comply with State off-road regulation.	
	• 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.	
	 Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the 	

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	operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary.	
•	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.	
•	Prohibit diesel idling within 1,000 feet of sensitive receptors.	
•	Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.	
•	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.	
•	The engine size of construction equipment shall be the minimum practical size.	
•	Catalytic converters shall be installed on gasoline-powered equipment.	
•	Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit.	
•	Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch on site.	
•	Use new or rebuilt equipment.	
•	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.	
•	Use low rolling resistance tires on long haul class 8 tractor-trailers.	
•	Suspend all construction activities that generate air pollutant emissions during air alerts.	
•	Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.	

Topic 2016 RTP/SCS PEIR Project Level Mitigation Measure Applicability to Proposed Project Sensitive Receptors MM-AIR-4(b): Consistent with the provisions of Section 15091 of the State The Proposed Project substantially complies with CEQA Guidelines, SCAG has identified mitigation measures that are within this measure. As previously discussed and list the jurisdiction and authority of the air quality management district(s) where above, regulatory control measures would proposed 2016 RTP/SCS transportation projects would be located. Where address this measure; no additional measures the Lead Agency has identified that a project has the potential to expose required. sensitive receptors to substantial pollutant concentrations and harm public Furthermore, the Lead Agency has identified that health outcomes substantially, the Lead Agency can and should consider the the project would not have the potential to measures that have been identified by CARB and air district(s), or other expose sensitive receptors to substantial pollutant comparable measures, to reduce cancer risk pursuant to the Air Toxics "Hot concentrations and harm public health outcomes Spots" Act of 1987 (AB2588), as applicable and feasible. Such measures substantially. include those adopted by CARB designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment. CARB's strategy includes the following elements: Set technology forcing new engine standards Reduce emissions from the in-use fleet . Require clean fuels, and reduce petroleum dependency • Work with US EPA to reduce emissions from federal and state sources .

Pursue long-term advanced technology measures.

Biological Resources

Candidate, sensitive, or special status species. Riparian or other sensitive natural community. Wetlands. Species movement. Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans **MM-BIO-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 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 Game 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

This Mitigation Measure is not applicable to the Proposed Project as Proposed Project site is an infill site in urban areas in close proximity to transit and therefore Proposed Project site is not anticipated to 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 Game or U.S. Fish and Wildlife Service. Additionally, adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to nesting birds if present.

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	Department of Fish and Wildlife. Such measures may include the following, or other comparable measures identified by the Lead Agency:	As stated as a mitigation measure in Section 6.0, Initial Study, the Project Applicant would comply
	 Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible 	Trees), Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing
	 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 	trees on the site and within the adjacent public right(s)-of-way.
	Species Act of 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 protect the survival and recovery in the wild of federally and state-listed endangered species	Removal or planting of any tree in the public right(s)-of-way requires approval of the Board of Public Works. All trees in the public right(s)-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.
	 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 	
	 Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources 	
	Appoint an Environmental Inspector to monitor implementation of mitigation measures	
	 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 	
	• Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance	
	• 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.	

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Riparian or other sensitive natural community. Wetlands. Species movement. Local policies or ordinances protection biological resources

MM-BIO-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 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 Game 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. 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. Such measures may include the following, or other comparable measures identified by the Lead Agency:

- 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.
- 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
- 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 California Endangered Species Act, or Fully- Protected Species afforded protection pursuant to the State Fish and Game Code
- Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds.

Applicability to Proposed Project

This Mitigation Measure is not applicable to the Proposed Project as Proposed Project site is an infill site in an urban area in close proximity to transit and therefore would not contain riparian areas, wetlands or be expected to affect species movement or conservation plans

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	 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. 	
	• Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.	
	• Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the Manual of California Vegetation, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate.	
	• Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.	
	• 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.	
	• Install fencing and/or mark sensitive habitat to be avoided during construction activities.	
	• 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.	
	• Revegetate with appropriate native vegetation following the completion of construction activities.	
	• Complete habitat enhancement (e.g., through removal of nonnative invasive wetland species and replacement with more ecologically valuable native species).	
	 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 	

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	or other silt-catching devices, and using settling basins to minimize soil transport.	
Wetlands Species movement. Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	MM-BIO-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 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 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:	This Mitigation Measure is not applicable to the Proposed Project as Proposed Project site is an infill site in an urban area in close proximity to transit and therefore would not impact wetlands and would not affect species movement or, policies, or regulations protecting biological resources
	 Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible. 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 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 those affected by the proposed project. 	

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	 This compensatory mitigation process seeks 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. Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether wetlands will be affect and, if necessary, perform a formal wetland delineation. 	
Species movement. Local policies or ordinances protecting biological resources. HCP, NCCP or other conservation plans.	 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 of the USFWS, USFS, CDFW, and related regulations, goals and polices of counties and cities, as applicable and feasible. 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. 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. 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. Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 Section 460 of 	The Proposed Project substantially complies with this measure. The site is located in a developed urbanized area and does not provide habitat for sensitive Biological resources. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Proposed Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area. The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. Implementation of MM-BIO-4(B) would require that the Proposed Project comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. The Proposed Project will be required to comply with the provisions of the

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	the California Code of Regulations protecting fur-bearing mammals, during the breeding season.	MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the
	• Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible.	breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if
	• 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.	touna.
	• 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 nondisturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest 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 expansions in the nest buffer distance may be 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 prior to February 1, or following the nesting 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 avoid adverse impacts from linear projects that 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 habitat fragmentation.	
	• Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore off-site habitat).	

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	 Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible. 	
	• Evaluate the potential for overpasses, 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 FHWA's Critter Crossings or Ventura County 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.	
	 Install wildlife fencing where appropriate to 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-scale habitat areas. 	
	 Where avoidance is determined to be infeasible, design sufficient conservation 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. 	
	• 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.	
	• 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 impressed with final an unbestigation of a second in the	
•	 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. 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. 	
Local policies or ordinances protection C biological resources. HCP, a NCCP or other p conservation plans. r A tl	 MM-BIO-5(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 bolicies 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, he 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 applicable and reasible. Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. 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. 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. 	The Proposed Project substantially complies with this measure. The site is located in a developed urbanized area and does not provide habitat for sensitive Biological resource. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Proposed Project. In addition, the Project would comply with the City of Los Angeles Protected Tree Ordinance. The removal and replacement of any trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Thus, the Project Applicant would comply with the previously mentioned MM-BIO-1 to ensure that no significant impacts to trees would occur. Impacts would be less than significant with Project mitigation incorporated.

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	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.	
	• Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.	
	• 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 heavy construction equipment or construction materials be operated or stored within a 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.	
	• 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.	
	• 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.	
	 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. 	

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	• Design projects to avoid conflicts with local policies and ordinances protecting biological resources.	
	 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 	
Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	MM-BIO-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 impacts on HCP and NCCPs 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 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.	This Mitigation Measure is not applicable to the Proposed Project as Proposed Project site is an infill site in an urban area and not subject to a HCP NCCP.
	 Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs. 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. Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited 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. 	

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Cultural Resources		
Paleontological resources, unique geological features	MM-CUL-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 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 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.	The Proposed Project substantially complies with this measure. The Proposed Project is on a previously developed site in an urban area. No unique geological features or unique paleontological resources are known to exist on the site.
	 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. Avoid exposure or displacement of parent material with a moderate to 	
	high potential to yield unique paleontological resources.	
	• Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance.	
	• Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.	
Historical resources, archaeological resources	MM-CUL-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 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	The Proposed Project substantially complies with this measure. A historic resource assessment of the Project site was conducted which determined that the existing structures on the site are not historic resources under CEQA. Additionally, the Project site is not currently listed under national, state, or local landmark or historic
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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 include:

- Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified.
- 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
- 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 actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:
- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.

Applicability to Proposed Project

district programs. It was not identified as being historic or potentially historic under federal, state, and local criteria in any historic resource surveys of the area, including SurveyLA, the citywide historic resources survey of Los Angeles.

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•	Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.	
•	Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource.	
•	Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the Project site.	
•	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.	
•	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 archaeological resources.	
•	If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property.	
•	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 archaeologist familiar with the local 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 resource will need to be mitigated.	

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	• Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.	
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 human remains that are within the jurisdiction and responsibility of the 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 should consider mitigation measures capable of avoiding or reducing significant impacts on human remains, to ensure compliance with the California Health and Safety Code, Section 7060, and Section 18950-18961 and Native American Heritage Commission, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:	This measure is not applicable to the Proposed Project as it has not been identified as having the potential for significant effects.
	• In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.	
	• If any discovered remains are of Native American origin: Contact the County Coroner to contact the Native American Heritage Commission (NAHC) to ascertain the proper descendants from the deceased individual. The coroner should make recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.	

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Energy		
Residential and commercial energy use	MM-EN-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 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:	The Proposed Project substantially complies with this measure through Regulatory Compliance Measures. The Proposed Project will be constructed to meet all CALGreen code as well as LA Green Building Code, which meets and exceeds applicable provisions of the CALGreen Code. The Proposed Project is located near transit resulting in low fuel consumption
	• Integrate green building measures consistent with CALGreen into project design.	
	• Use energy efficient materials in building design, construction, rehabilitation, and retrofit.	
	 Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. 	
	• Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight.	
	• Incorporate passive environmental control systems that account for the characteristics of the natural environment.	
	 Use high-efficiency lighting and cooking devices. 	
	Incorporate passive solar design.	
	 Use high-reflectivity building materials and multiple glazing. 	
	Prohibit gas-powered landscape maintenance equipment.	
	Install electric vehicle charging stations.	
	Reduce wood burning stoves or fireplaces.	
	• Provide bike lanes accessibility and parking at residential developments.	

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Торіс

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Geology and Soils

Earthquake or other seismic activity. Unstable geologic unit or soil, expansive soils. **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 Standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:

- 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 fault.
- Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the AlquistPriolo 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.
- 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.

The Proposed Project substantially complies with this measure. The Proposed Project would not exacerbate geologic impacts. Further, the Proposed Project already substantially conforms with this Mitigation Measure as it is subject to regulatory compliance and building codes, which are 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.

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	• 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.	
	 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 measures to eliminate any problems. 	
	• 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.	
	• 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.	
Soil erosion, loss of top soil	MM-GEO-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 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	The proposed Project substantially conforms with this Mitigation Measure as it is subject to regulatory compliance and building codes that are capable of avoiding or reducing the significant effects on the potential for the Proposed Project to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and

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	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:	responsibility of public agencies, regulatory agencies, and/or Lead Agencies.
	 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 investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. 	
	 Consistent with the requirements of the State 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: File a Notice of Intent (NOI) with the SWRCB. 	
	 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. 	
	• 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.	
	• After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB.	
	• Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan,	

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	 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. Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils. 	
Greenhouse Gases		
GHG Emissions, plan consistency.	MM-GHG-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 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 set forth below:	The Proposed Project substantially conforms with this Mitigation Measure as it is consistent with State, regional, and the City's Climate Action Plan goals and objectives, therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. For example, the Proposed Project would incorporate specific measures to the extent feasible including but are not limited to the provisions of the Los Angeles Green Building Code and the CALGreen code which include standards for the provision of electric vehicle charging stations capable of supporting future electric vehicle supply equipment.
	 Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision. 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.	
	Off-site measures to mitigate a project's emissions.	

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	 Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction, and operation of projects to minimize GHG emissions. 	
	• 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.	
	 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. 	
	 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. 	
	 Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs. 	
	 Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles. 	
	Land use siting and design measures that reduce GHG emissions.	
Hazards		
Routine transport, use or disposal of hazardous materials, reasonably foreseeable upset, accident. Hazardous emissions near a school	MM-HAZ-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 related to 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	This Mitigation Measure is not applicable to the Project as the Lead Agency has not identified that the project could have the potential for significant effects from the routine transport, use of disposal of hazardous materials. Proposed Project will not result in the routine transport, use, or disposal of hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes, and the use of such substances would comply with State Health Codes and Regulations. Construction could involve the use of potential hazardous materials,

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	regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:	including 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.
	• 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.	
	• Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.	
	• 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.	
	 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. 	
	 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. 	
	 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. 	
	 Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. 	
	 Avoid overtopping construction equipment fuel gas tanks. 	
	• During routine maintenance of construction equipment, properly contain and remove grease and oils.	
	• Properly dispose of discarded containers of fuels and other chemicals.	

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Hazardous materials sites, Government Code section 65962.5.	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 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:	This Mitigation Measure is not applicable as the City, as Lead Agency, has not identified that the project has the potential for significant effects due to hazardous materials.
	 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. 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. 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. Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site 	

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	action plans, risk management plans, soil management plans, and groundwater management plans.	
	• 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.	
	• 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 other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.	
	• Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.	
	 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. Use best management practices (BMPs) regarding potential soil and groundwater hazards. 	
	 Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or nonhazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off- site facility. Complete sampling and handling and transport procedures 	

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	for reuse or disposal, in accordance with applicable local, state, and federal laws and policies.	
	• 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.	
	• 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 but not limited to the 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 further environmental contamination as a result of construction.	
	• If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos 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, and any other building materials or stored materials classified as hazardous waste by state or federal law. 	
	• Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a	

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	 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 OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (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 of such materials. 	
	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.	
Wildland fire risk	MM-HAZ-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 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 Project as the Project Site is located in an urbanized area that does not contain any wildlands or urbanized areas intermixed with wildlands.
	• 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.	

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	• 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 use compatibility, training, sustainable development, brush management, and public outreach.	
	• 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-resistant foliage, or evergreen growth), eliminate brush and chaparral, and discourage the use of fire-promoting species especially nonnative, invasive species (e.g., pampas grass, fennel, mustard, or the giant reed) in the immediate vicinity of development in areas with high fire threat.	
	• Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of nonnative, 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 nonnatives.	
	• 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.	
	• 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.	
	• 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.	
	• Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat.	

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Hydrology and Water Quality

Topic

Violation of water quality standards or waste discharge requirements. Alteration of site drainage, runoff exceeding stormwater drainage system capacity, other degrading water quality. **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 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 the Lead Agency:

- Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.
- Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.
- 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.
- Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.
- Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
- 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.
- Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.

The Proposed Project substantially conforms with this Mitigation Measure as it is subject to regulatory compliance measures which are 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 Board and other regulatory agency requirements including, but not limited to, the National Pollution Discharge Elimination System (NPDES) permitting requirements.

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	 Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. 	
	• Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the Statewide permit applies.	
	 Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff 	
	 Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. 	
	• Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters.	
	• 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.	

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	• 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.	
Depletion of groundwater supply, interfere with groundwater supply	MM-HYD-2(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 groundwater basins, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: 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.	This Mitigation Measure is not applicable to the Project as the Project Site is located in an urbanized area that does not contain any significant groundwater recharge areas.
	lieu fees and off-site mitigation.	
	Avoid designs that require continual dewatering where feasible. Avoid construction and siting on groundwater recharge areas, to prevent	

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	conversion of those areas to impervious surface Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	
Structures within 100- year floodplain hazard area, risk due to levee or dam failure, seiche, tsunami, or mud flow.	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 potential for significant effects, the Lead Agency can 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:	This Mitigation Measure is not applicable to the Project as the Project Site is located in an urbanized area that is not within 100-year floodplain hazard area, or at risk due to levee or dam failure, seiche, tsunami, or mud flow.
	• 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.	
	 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. 	
Land Use		
Land use plans, policies, and regulations.	MM-LU-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 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	The Proposed Project substantially complies with this measure. The Proposed Project is located in proximity to transit and would be consistent with plans and polices with respect to any potential physical environmental impacts.

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	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:	
	• 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.	
Physically divide a community.	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:	This Mitigation Measure is not applicable to the Proposed Project as Proposed Project site is an infill site in an urban area and would not divide a community.
	 Consider alignments within or adjacent to existing public rights-of- way. 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. Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods. 	

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	• 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:	
	Alignment shifts to minimize the area affected	
	• 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.	
	• 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.	
Mineral Resources		
Loss of availability of a known mineral resource.	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. 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:	This Mitigation Measure is not applicable to the Proposed Project as Proposed Project site is an infill site in an urban area where no mineral extraction is taking place.
	 Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation, and maintenance of projects. Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures. 	

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	that 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.	
	• 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.	
	• Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.	
	• Avoid 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.	
Noise		

Expose people to noise in excess of local standards. Excessive groundborne vibration or noise levels. Substantial permanent increase in noise level. Substantial temporary increase in noise levels.

MM-NOISE-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 of noise 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 consistency with the Federal Noise Control Act, California Government Code Section 65302, the Governor's Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health a3nd safety standards set forth by federal, state, and local authorities that regulate noise levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

The Proposed Project substantially complies with this measure. As stated in Section 6.0, Initial Study, the Lead Agency complies with all L.A. CEQA Thresholds Guide related to noise.

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•	Install temporary noise barriers during construction.	
•	part of the project design.	
•	Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices.	
•	Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels.	
•	Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off- hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.	
•	Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.	
•	Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.	
•	Designate an on-site construction complaint and enforcement manager for the project.	
•	Ensure that construction equipment are properly maintained per manufacturers' specifications and 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.	

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•	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 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 are available and consistent with construction procedures.	
ſ	 Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors. 	
•	 Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise- sensitive receptors. 	
·	 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 receptors to the maximum extent feasible. 	
•	• Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way.	
•	• Use noise barriers to protect sensitive receptors from excessive noise levels during construction.	
	 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. 	
•	• Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.	
•	 Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. 	
•	 Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve 	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.	
Expose people to excessive groundborne vibration or noise.	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:	The City of Los Angeles has not adopted any thresholds associated with human annoyance for ground-borne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. Furthermore, the nearest residential structures are over 100 feet away from the Project site. As such, impacts would be less than significant.
	• 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.	
	• 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.	
	• 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 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.	
	• For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	use of more than one pile driver to shorten the total pile driving duration.	
Population, Housing and E	mployment	
Displacement of housing requiring replacement housing elsewhere.	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:	This Mitigation Measure is applicable to transportation projects and would not apply to the Proposed Project. Further, the Proposed Project would involve the construction of new housing and would not involve any displacement of housing.
	 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. Prioritize the use existing ROWs, wherever feasible. Develop a construction schedule that minimizes potential neighborhood detonation from protracted waiting periods between right-of-way acquisition and construction. 	
Public Services		
Adverse effects associated with new or physically altered government facilities for fire protection and emergency response.	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 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	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact fire protection or emergency services.

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	the applicable 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:	
	• 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.	
	 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-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(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. 	
Adverse effects associated with new or physically altered government facilities for police protection.	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	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact police protection services.

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	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:	
	 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. Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and (as personnel). 	
	 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-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(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. 	
Adverse effects associated with new or physically altered government facilities for schools.	MM-PS-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 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 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	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact school services. In addition, the Applicant will be required to pay school impact fees to the LAUSD based on the current fee schedule for residential developments prior to the issuance of building permits to provide funds to ensure adequate school facilities are available.

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
Topic	 2016 RTP/SCS PEIR Project Level Mitigation Measure 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: Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable. 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-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-UISS 4(b) and MM USS 6(b) to avoid or reduce cimiliant. 	Applicability to Proposed Project
	environmental impacts associated with the construction or expansion	
	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.	
Desausation		

Recreation

Increase use and physical deterioration of recreational facilities.

MM-REC-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 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 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:

This Mitigation Measure would be met through a combination of (1) on-site open space proposed within the Project discussed above, and (2) payment of applicable fees in accordance with LAMC Section 21.10.3(a)(1), As such, potential impacts would be less than significant.

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	 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. 	
	 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: Increasing the accessibility to natural areas for outdoor recreation, Promoting infill development and redevelopment to revitalize existing communities, Utilizing "green" development techniques, Promoting water- efficient land use and development, Encouraging multiple uses, Including trail systems and trail segments in General Plan recreation standards. 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. 	
Traffic and Transportation		
Conflict with measures of effectiveness for performance of the circulation system.	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	This Mitigation Measure is not applicable to the Proposed Project because, as stated in Section 6.0 , the Project was determined not to have significant impacts on the circulation system.

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	measures as set forth below, or through other comparable measures identified by the Lead Agency:	
	 Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation. 	
	• 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.	
	Provide a vanpool for employees.	
	• Fund capital improvement projects to accommodate future traffic demand in the area.	
	 Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single-occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement, Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document), Signage and striping on site to encourage bike safety, Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials, Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan, Direct transit sales or subsidized transit passes, Guaranteed ride home program o Pre-tax commuter benefits (checks), On-site carpooling program, Distribution of information concerning alternative transportation options o Parking spaces sold/leased separately, Parking management strategies; including attendant/valet parking and shared parking spaces. 	
	 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. 	

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•	Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible.	
•	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, and providing public education and publicity about public transportation services.	
•	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.	
•	Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs.	
•	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.	
•	Provide information on alternative transportation options for consumers, residents, tenants, and employees to reduce transportation-related emissions.	
•	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.	
•	Purchase, or create incentives for purchasing, low or zero-emission vehicles.	
•	Create local "light vehicle" networks, such as neighborhood electric vehicle systems.	
•	Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.	

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	• Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.	
	• 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.	
	• Project Selection: Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. o Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints.	
	• Public Involvement: Carry out a comprehensive public 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.	
	• Transit and Multimodal Impact Fees: Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure, and other multimodal accommodations. o Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions.	
	• System Monitoring: Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency.	
	 Arterial Traffic Management: Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. 	
	• Signal Synchronization: Expand signal timing programs where emissions reduction benefits can be 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.	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	• HOV Lanes: Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions.	
	• Delivery Schedules: Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off- peak hours in high traffic areas, Implement and supporting trip reduction programs, Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives.	
	• 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.	
	• Bicycle and Pedestrian Trails: Establish a network of multiuse trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations.	
	• Bicycle Safety Program: Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers.	
	• Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects.	
	• Bicycle Parking: 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 multifamily developments (suggestion: check language with League of American Bicyclists).	
	 Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following: Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation; Eliminate or reduce minimum parking requirements for new buildings; "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space); Use parking pricing to discourage 	

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Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	private vehicle use, especially at peak times; Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities; Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times; Encourage shared parking programs in mixed-use and transit-oriented development areas.	
	• Establish policies and programs to reduce on-site 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; Encourage special event center operators to advertise and offer discounted transit passes with event tickets; Encourage special event center operators to advertise to carpooling patrons, with four or more persons per vehicle for on- site parking; Promote the use of bicycles by providing space for the operation of valet bicycle parking service.	
	• Parking "Cash-out" Program: Require new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use.	
	 Pedestrian and Bicycle Promotion: 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: Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel-efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models.	
Conflict with applicable Congestion Management Plan.	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	This Mitigation Measure is not applicable to the Proposed Project because, as stated in Section 6.0 , Project traffic impacts were analyzed, and no significant traffic impacts were identified.

Topic

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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 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:

- Encourage a comprehensive parking policy that prioritizes system . management, increase rideshare, and telecommute opportunities, including investment in nonmotorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: Advocate for a regional, market-based system to price or charge for auto trips during peak hours. Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation. Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology. Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation. 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 nonmotorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay.
- 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
| Торіс | 2016 RTP/SCS PEIR Project Level Mitigation Measure | Applicability to Proposed Project |
|-------|---|-----------------------------------|
| | Lead Agency: 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. Notification | |
| | procedures for adjacent property owners and public safety personnel | |
| | regarding when major deliveries, detours, and lane closures will occur. | |
| | Location of construction staging areas for materials, equipment, and | |
| | vehicles at an approved location. A process for responding to, and | |
| | tracking, complaints pertaining to construction activity, including | |
| | identification of an on-site 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 Provision for | |
| | accommodation of pedestrian flow. As necessary, provision for parking | |
| | management and spaces for all construction workers to ensure that | |
| | construction workers do not park in on street spaces. 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, 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. | |
| | Any heavy equipment brought to the construction site shall be | |
| | transported by truck, where feasible. No materials or equipment shall | |
| | be stored on 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. All equipment shall be | |
| | equipped with mufflers. 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 public rights-of-way, or properties | |

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	of adjacent or nearby neighbors. Promote "least polluting" ways to connect people and goods to their destinations.	
	 connect 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: Ensure transportation centers are multimodal to allow transportation modes to intersect. Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail. To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges. Focus transit resources on high-volume corridors and high-boarding destinations. Coordinate schedules and routes across service lines with neighboring transit authorities. Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles). Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so. Employ transit-preferential measures, such 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- preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles. Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets. 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. 	
	• Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including: Ensure transit stops and bus lanes are safe, convenient, clean, and efficient. Ensure transit stops have clearly marked street-level designet in and are associable.	
	designation, and are accessible. Ensure transit stops are safe, sheltered,	

benches are clean, and lighting is adequate. Place transit stations along

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one half mile.	
	• Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including: Develop a Regional Pass system to reduce the number of different passes and tickets required of system users. Implement "Smart Bus" technology, using 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). Investigate the feasibility of an on-line tripplanning program.	
	• Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including: Give funding preference to improvements in 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: Designate a certain percentage of parking spaces for ride-sharing vehicles. Designate adequate passenger loading, unloading, and waiting areas for ride- sharing vehicles. Provide a web site or message board for coordinating shared rides. Encourage private, for-profit community car-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 programs.	
	 Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including: Provide assistance to regional and local ridesharing organizations. Advocate for legislation to maintain and expand incentives for employer ridesharing programs. Require the development of Transportation Management Associations for large employers and commercial/ 	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	 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 encourage employers to subscribe to or support the program.	
	• Encourage and utilize shuttles to serve 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.	
	• Work with existing shuttle service providers to coordinate their services.	
	• Facilitate employment opportunities that minimize the need for private vehicle trips. Amend zoning ordinances and the Development Code to include live/work sites 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 GHG-reducing activities. 	
	• Implement a Parking Management Program to discourage private vehicle use, including: Encouraging carpools and vanpools with preferential parking and a reduced parking fee. Institute a parking cashout program. Renegotiate employee contracts, where possible, to eliminate parking subsidies. Install on-street parking meters with fee structures designed to discourage private vehicle use. Establish a parking fee for all single-occupant vehicles.	
	• Work with school districts to improve pedestrian and bicycle to schools and restore school bus service.	
	 Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities. 	
	 Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency. 	
	• Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers.	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	 Synchronize traffic signals to reduce congestion and air quality. Work with community groups and business associations to organize and publicize walking tours and bicycle events. Support legislative efforts to increase funding for local street repair. 	
Inadequate emergency access. Impair or interfere with Emergency Response Plan or Evacuation Plan.	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:	The Proposed Project substantially complies with this Mitigation Measure because the design of the Proposed Project would not cause any alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way.
	 Prior to construction, project implementation 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: Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. Development of circulation and detour plans 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. Scheduling of truck trips outside of peak morning and evening commute hours. Limiting of lane closures during peak hours to the extent possible. Usage of haul routes minimizing truck traffic on local roadways to the extent possible. Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. Installation of traffic 	

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions 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. Storage of construction materials only in designated areas. Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones as percessary.	
	 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. 	
	• Enhance emergency preparedness awareness among public agencies and with the public at large.	
	• Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities, Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format, 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.	
Utilities and Service System	15	
Require new or expanded entitlements for wastewater treatment	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	This Mitigation Measure is not applicable to the Proposed Project because analysis has demonstrated that the net increase of wastewater from the Proposed Project would not significantly

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project		
	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, 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	impact the Hyperion Water Treatment Plant and no new or expanded entitlements for wastewater treatment would be required. Furthermore, the Project Applicant shall be required to implement applicable LA Green Building Code requirements that would further reduce wastewater flow.		
Require new or expanded entitlements for water supply.	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:	This Mitigation Measure is not applicable to the Proposed Project as the Lead Agency has determined that the Project is within the growth projections used to by the LADWP in its Urban Water Management Plan and no new or expanded entitlements for water supply would be required.		
	• 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.			
	• Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed			

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	water especially in median landscaping and hillside landscaping can and should be implemented where feasible.	
	• Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.	
	• 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 the project. Comply with appropriate building codes and standard practices including the Uniform Building Code.	
	• 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.	
	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.	
Landfill capacity.	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:	The Proposed Project substantially conforms with this Mitigation Measure as it is subject to regulatory compliance measures that avoid or reduce 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.

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
Topic	 2016 RTP/SCS PEIR Project Level Mitigation Measure Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities, Inclusion of a waste management plan that promotes maximum C&D diversion, 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) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.), Reuse of existing structure and shell in renovation projects, Design for deconstruction without compromising safety, Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components, Development of indoor recycling program and space, Discourage the siting of new landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities, Locally generated waste should be disposed of regionally, considering distance to disposal site. Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required, Encourage the development of local markets for waste prevention, reduction, and recycling practices, Develop ordinances that promote waste prevention and recycling practices, Develop ordinances that promote waste prevention and recycling practices. Develop ordinances that promote waste prevention and recycling e	Applicability to Proposed Project

Торіс	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	facilities, Develop alternative waste management strategies such as composting, recycling, and conversion technologies, Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts, Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard), Integrate reuse and recycling into residential industrial, institutional and commercial projects, Provide recycling opportunities for residents, the public, and tenant businesses, Provide education and publicity about reducing waste and available recycling services, Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates, Implement or expand city or county-wide recycling and composting programs for 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 publicity about recycling services.	

Source: 2016 SCAG/RTP SCS FEIR

CITY OF LOS ANGELES

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY and CHECKLIST

LEAD CITY AGENCY:			COUNCIL DISTRI	CIL DISTRICT: DATE:	
City of Los Angeles, Department of City Planning		CD 14 – Huizar	1 – Huizar		
RESPONSIBLE AGENCIES:					
PROJECT TITLE:		ENVIRO	NMENTAL CASE:	TAL CASE: CASE NOS:	
350 South Figueroa Project		ENV-20	18-2700-SCEA	DIR-2018	3-2699-SPP
PREVIOUS ACTIONS CASE NO.	D D	OES have	have significant changes from previous actions.		
No recent activity.		DOES NOT have significant changes from previous actions			
		013 1101	nave significant e	nunges nor	
PROJECT LOCATION: 350 South Figure	eroa Street,	Los Ange	eles, California 900)71.	
PROJECT DESCRIPTION: The propose	ed Proiect w	ould invo	olve removal of ap	proximatel	v 29.500 sq. ft. of office and
parking uses from the Project Site. 1	The propose	d Project	t will add a new, 4	1-story res	idential building integrated
into the existing structure. The Project	ct would ad	d approxi	mately 624,500 s	quare feet o	of new residential floor area
at the southwest corner of the Project site for a combined 925,000			ined 925,000 squ	are feet of	floor area. The residential
building would be a maximum of 480 feet in height and contain			contain 570 reside	ential units	. The Floor Area Ratio (FAR)
of the Project would be 5.8:1.					1
COMMUNITY PLAN AREA:			AREA PL	ANNING	CERTIFIED
Central City			COMMIS	SION:	NEIGHBORHOOD
STATUS:			Central		
Preliminary 🛛 Does (Conform to	Plan			Downtown
Proposed Does I	NOT Confor	m to Plar	1		
Adopted in 2003					
EXISTING ZONING:	MAX DENS	ITY ZONI	NG: LA River	Adjacent:	
C4-4D	13:1 FAR		No		
GENERAL PLAN LAND USE: MAX. DENSITY PLAN			N: PROPOS	PROPOSED PROJECT DENSITY:	
Regional Center Commercial Same as zoning				ł	

Determination (to be completed by Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.
- I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified 'residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the Project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because this Sustainable Communities Environmental Assessment (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.

Signature

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact			
AE Exc	ESTHETICS xcept as provided in Public Resources Code Section 21099, would the project:							
a.	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 within a state scenic highway?							
c.	In nonurbanized areas, substantially degrade the existing visual character or quality of public views 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?							
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?							
AG	RICULTURE AND FORESTRY RESOURCES							
Wc	uld 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?				\square			
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			

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
AIR	RQUALITY				
Wo	uld the project:			<u></u>	
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?				\boxtimes
BIC	DLOGICAL RESOURCES		·		
Wo	uld the project:	1	· · · · · · · · · · · · · · · · · · ·		
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				
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?				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
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?				
CU Wo	LTURAL RESOURCES				
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			\boxtimes	
c.	Disturb any human remains, including those interred outside of dedicated cemeteries?				
EN	ERGY				
Wo	uld 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	
GE	OLOGY AND SOILS		······································		
Wo	uld the project:				
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	 Rupture of a known earthquake fault delineated on the most recent Alquist-Pu Earthquake Fault Zoning Map issued by State Geologist for the area or based other substantial evidence of a known fa caused in whole or in part by the proje exacerbation of the existing environme conditions? Refer to Division of Mines Geology Special Publication 42. 	, as			
	Strong seismic ground shaking cause whole or in part by the proje exacerbation of the existing environme conditions?	d in 🗌 ect's ental			
	iii. Seismic-related ground failure, inclu liquefaction, caused in whole or in par the project's exacerbation of the exis environmental conditions?	ding t by ting			
	iv. Landslides, caused in whole or in part by project's exacerbation of the exis environmental conditions?	ting			
b.	Result in substantial soil erosion or the los topsoil?	s of			
c.	Be located on a geologic unit that is unstable that would become unstable as a result of project, and potentially result in on- or off landslide, lateral spreading, subside liquefaction, or collapse, caused in whole of part by the project's exacerbation of the exist environmental conditions?	e, or		\boxtimes	
d.	Be located on expansive soil, as defined in T 18-1-B of the Uniform Building Code (19 creating substantial direct or indirect risks to or property caused in whole or in part by project's exacerbation of the exis environmental conditions?	able 94), 9 life the ting			
e.	Have soils incapable of adequately suppor the use of septic tanks or alternative waste w disposal systems where sewers are not avail for the disposal of waste water?	ting 🗌 ater able			\square

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	Directly or indirectly destroy a unique paleontological resource or site unique geologic feature?			\boxtimes	
GR Wc	EENHOUSE GAS EMISSIONS uld the project:				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			\boxtimes	
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			\boxtimes	
HA	ZARDS AND HAZARDOUS MATERIALS				
Wo	uld the project:			\square	
d.	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?			\boxtimes	
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 caused in whole or in part from the project's exacerbation of existing environmental conditions?				
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?			\boxtimes	

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				\boxtimes
ΗY	DROLOGY AND WATER QUALITY				
Wo	uld the project:	I	·		
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:i. Result in substantial erosion or siltation on or off-site?				
	 Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; 				
	iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater 20drainage systems or provide substantial additional sources of polluted runoff; or				
	iv. Impede or redirect flood flows?				\square
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				
LAI	ND USE AND PLANNING				
Wo	uld the project:				
a.	Physically divide an established community?				\boxtimes
b.	Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			\boxtimes	
MI	NERAL RESOURCES				
Wo	uld the project:	1	1		
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 locally- important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				\boxtimes
NO	ISE				
Wo	uld the project:	•			
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	
e.	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?				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				\boxtimes
Would the project result in substantial adverse physical physically altered governmental facilities, need for new construction of which could cause significant environmen ratios, response times or other performance objectives for	impacts ass or physicall tal impacts, in any of the pu	ociated with th y altered gover n order to main ıblic services:	e provision of mmental facili tain acceptable	new or ties, the e service
a. Fire protection?			\square	
b. Police protection?			\square	
c. Schools?			\boxtimes	
d. Parks?			\square	
e. Other public facilities?			\boxtimes	

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
RE	CREATION					
а.	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?					
TR	ANSPORTATION					
Wo	uld the project:					
a.	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?					
b.	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			\boxtimes		
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		
TR	BAL CULTURAL RESOURCES					
Wo Puk def Nat	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					

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.				
UT					
Wo	uld the project:			\square	
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 reasonable 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?			\square	
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			\boxtimes	
wı	LDFIRE				
If Ic	ocated in or near state responsibility areas or lands class	ified as very h	igh fire hazard z	ones, would th	e project:
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?				M

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations form a wildfire or the uncontrolled spread of a wildfire?				\boxtimes
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?				\boxtimes
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?				\boxtimes
M	ANDATORY FINDINGS OF SIGNIFICANCE				
а.	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?			\boxtimes	

6.0 SUSTAINABLE COMMUNITIES ENVIRONMENTAL ANALYSIS

6.1 **AESTHETICS**

Exc 210	rept as provided in Public Resources Code Section 1999, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Have a substantial adverse effect on a scenic vista?			\boxtimes	
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			\boxtimes	
c.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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?				
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			\square	

a. Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. CEQA Section 21099(d)(1) states that a project's aesthetic impacts shall not be considered significant if the project is a residential, mixed-use residential, or employment center project; that is located on an infill site within a transit priority area (TPA). An infill site is defined as 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. A TPA is defined as an area within one-half mile of major transit stop that is existing or planned. The Project meets these criteria. As such, aesthetic impacts are considered less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less Than Significant Impact. Refer to Response to Checklist Question 1(a) above.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views 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?

Less Than Significant Impact. Refer to Response to Checklist Question 1(a) above.

Mitigation Measures

No project-specific mitigation measures are necessary.

d. Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Refer to Response to Checklist Question 1(a) above.

Mitigation Measures

Project Mitigation

No project-specific mitigation measures are necessary.

Cumulative Impacts

Refer to Response to Checklist Question 1(a) above. As such, the Project would not have a considerable contribution to cumulative aesthetic impacts.

6.2 AGRICULTURE AND FORESTRY RESOURCES

Wc	uld the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				\boxtimes
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))?				\boxtimes
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				\square
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. Would the project 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?

No Impact. The Project site is located within a highly developed and urbanized area of the City. The California Department of Conservation designates the Project site as "urban and built-up land."²⁵ No portion of the Project site or the surrounding area is designated as Farmland of Statewide Importance,

²⁵ California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2010, map, Sheet 2 of 3 (January 2012), ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf.

Unique Farmland, or Farmland of Local Importance and no farmland or agricultural activity exists on or near the Project site.²⁶ No impacts to farmland would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project site is subject to the applicable land use and zoning requirements of the Los Angeles General Plan and Municipal Code (LAMC). The Project site consists of one lot and is zoned C4-4D²⁷ and has the land use designation of Regional Center Commercial.²⁸ The Project site is not zoned for agricultural production and no Williamson Act contracts are in effect for the Project site.²⁹ No impacts would occur regarding agricultural zoning or Williamson Act lands.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. Would the project 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. As mentioned above, the Project site is zoned C4-4D and has the land use designation of Regional Center Commercial. The Project site is not zoned as forestland or timberland, and there is no timberland production at the Project site. No impacts regarding forest or timberland would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

²⁶ City of Los Angeles, ZIMAS, "Parcel Profile Report," zimas.lacity.org, accessed July 2019.

²⁷ City of Los Angeles, ZIMAS, "Parcel Profile Report," zimas.lacity.org, accessed August 2018.

²⁸ City of Los Angeles, Center City Community Plan, "Generalized Land Use Map," September 2016.

²⁹ California Department of Conservation, *Division of Land Resource Protection*, "The California Land Conservation Act (The Williamson Act) 2014 Status Report" (2015).

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The site and the surrounding area does not contain any forest land as defined in the Public Resources Code (PRC). No impacts to forest land would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

No Impact. Neither the Project site nor the surrounding area contain agricultural or forestry uses. No impacts to farmland would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

Neither the Project Site nor any of the related projects within downtown Los Angeles are used or designated as agricultural land or forest land. As such, the Project would not contribute to cumulative impacts to agricultural or forestry resources.

6.3 AIR QUALITY

Wo	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			\square	
c.	Expose sensitive receptors to substantial pollutant concentrations?			\square	
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact.

Existing Project Site Emissions

The Project site is currently developed with the World Trade Center building. The current site usage generates existing vehicle trips and air quality emissions from operations related for the office, retail, and parking uses. **Table 6.3-1: Existing Operational Air Quality Emissions** identifies the existing emissions from the existing uses. The most current CARB-approved, SCAQMD-recommended air quality modeling software, the California Emissions Estimator Model (CalEEMod version 2016.3.2), was used to estimate existing air quality operational emissions.

The Project site is located within the South Coast Air Basin SCAQMD is the agency principally responsible for comprehensive air pollution control and the reduction of the emission of criteria pollutants in the Basin. To that end, SCAQMD, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, and cooperates actively with all State and federal government agencies as part of its comprehensive planning obligations. SCAQMD develops rules and regulations, establishes permitting requirements, oversees an air permitting regime, inspects emissions sources, and enforces such measures through broad enforcement authority, including the ability to issue fines, order corrective measures, and to limit, condition or rescind permits to operate.

Source	voc	NOx	со	SOx	PM10	PM2.5
Source						
Area	<1	<1	<1	<1	<1	<1
Energy	<1	1	<1	<1	<1	<1
Mobile	<1	8	6	<1	1	<1
Total	1	2	6	<1	2	<1
SCAQMD threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Table 6.3-1 Existing Operational Air Quality Emissions

Notes:

CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gases; SOx = sulfur oxides.
Refer to Air Quality Modeling Results in Appendix A.

To fulfill its commitments as an MPO under the Sustainable Communities and Climate Protection Act, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The Growth Management chapter of the RTP/SCS forms the basis of land use and transportation controls of the Air Quality Management Plan. Projects that are consistent with the projections of population forecasts are considered consistent with the AQMP.

The air quality plans applicable to the Project site are the SCAQMD's 2016 AQMP, the 2016–2040 RTP/SCS, and the City's Air Quality Element.

2016 AQMP

The 2016 AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Projects that are considered to be consistent with the AQMP do not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Therefore, project, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP.

The Air Basin is designated as nonattainment at the federal level for O3 and PM2.5; and at the state level for O3, PM10, and PM2.5. SCAQMD developed regional emissions thresholds to determine whether a project would contribute to air pollutant violations. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Air Basin.

As discussed and shown in **Table 6.3-2** below, temporary emissions associated with construction of the Project would fall below SCAQMD thresholds for VOCs, NOx, CO, SOx, PM10, and PM2.5.

As discussed and shown in **Table 6.3-3** below, long-term emissions associated with operation of the Project would not exceed SCAQMD thresholds for VOCs, NOx, CO, SOx, PM10, and PM2.5.

The Project's maximum potential NOx, CO, PM10, and PM2.5 daily emissions during construction and operation were analyzed to determine potential effects on localized concentrations and to determine if the potential exists for such emissions to cause or affect a violation of an applicable AAQS. As shown in **Table 6.3-4**, NOx, CO, PM10, and PM2.5 emissions would not exceed the SCAQMD localized significance thresholds.

The Project is also located in an urban area, which would reduce vehicle trips and vehicle miles traveled due to the Project's urban infill characteristic and proximity to public transit stops. These measures and features are consistent with existing recommendations to reduce air emissions. Since the AQMP forms the basis for strategies by growth projections, the future development would be consistent with the planned land uses and would not conflict or obstruct implementation with the AQMP.

2016–2040 RTP/SCS

The growth projections from SCAG's 2016–2040 RTP/SCS form the basis for the strategies identified in the AQMP. The City of Los Angeles had a total of 3,845,500 people in 2012, and it is projected that a total population of 4,609,400 by the year 2040.³⁰ The population increase within the City between 2012 and 2040 was forecasted to be 763,900. As discussed in **Section 3.0** above, the construction of 570 new multifamily residential dwelling units would result in an estimated increase of approximately 1,077 new residents in the Bunker Hill and downtown area. This would yield to approximately 0.1 percent of the anticipated increased projected within the City. This increase would not result in population and housing growth that would cause growth within the City to exceed the SCAG population forecast. Furthermore, as discussed in **Table 3.1-1** above and **Section 6.13: Population and Housing** below, the Project is consistent with SCAG policies. Because the Project is located in a TPA and provides for needed housing and affordable housing, the population growth generated by the Project would not conflict with the City's and SCAG's growth policies.

Air Quality Element

The City's Air Quality Element includes Citywide policies regarding a range of City resources and services, some of which are relevant to air quality. **Table 6.3-2: Applicable Goals and Policies of the Air Quality**

³⁰ Southern California Association of Governments, *Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* (April 2016), Demographics and Growth Forecast.

Element, evaluates the consistency of the Project with the applicable air quality goals, objectives, and policies in the Air Quality Element. As discussed below, the Project construction and operations would not conflict with or be inconsistent with applicable air quality policies of the General Plan.

Recommendation	Analysis of Project Consistency
Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.	Consistent . The Project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement "smart growth". The Project would provide residential uses and employment opportunities in close proximity to job centers in Los Angeles where people can live and work and have access to convenient modes of transportation that provides options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The Project would meet the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The project would also reduce VMT as a result of its urban infill location in a dense mixed-use area. The Project would add new infill residential units, with convenient access to public transit, which would allow people to live near work and recreational amenities. The Project site is in a highly urbanized area in the City within a High Quality Transit Area (HQTA) and a Transit Priority Area (TPA) The Project site is currently served by a total of seven local and inter-city transit operators. As a result, the Project would provide people with convenient mobility options and a wide range of economic/employment opportunities.
Policy 1.3-1: Minimize particulate emissions from construction sites.	Consistent . The Project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403, which would minimize particulate emissions associated with construction-related vehicular traffic
Goal 2: Less reliance on single-occupant vehicles with fewer commute and nonwork trips.	Consistent . The Project's land use characteristics would reduce trips and VMT due to its urban infill location in a dense mixed-use area that includes nearby housing, employment, commercial and service uses with nearby access to multiple nearby public transportation routes. As discussed above, The Project site is in a highly urbanized area in the City within a High Quality Transit Area (HQTA) and a Transit Priority Area (TPA) The Project site is currently served by a total of seven local and intercity transit operators.
Policy 2.1-1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	Consistent. The Project would be within a quarter-mile of existing and future public transportation, and would provide access and pedestrian links to surrounding services and employment.

Table 6.3-2 Applicable Goals and Policies of the Air Quality Element

Recommendation	Analysis of Project Consistency
Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	Consistent . The Project's characteristics would reduce trips and VMT due to its infill location, ready access to public transportation, close proximity to multiple other destinations including job centers, commercial uses, and services, and is pedestrian and bicycle friendly. As discussed above, The Project site is in a highly urbanized area in the City within a High Quality Transit Area (HQTA) and a Transit Priority Area (TPA) The Project site is currently served by a total of seven local and inter-city transit operators.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	Consistent. The Project would provide new residential units in an infill location that is walkable to public transportation, employment retail, restaurant, and entertainment uses.
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. The Project would provide new residential units in an infill location that is walkable to public transportation. The Project would also provide bicycle parking and would maintain the existing pedestrian bridges connecting to adjacent uses.
Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The Project environmental review includes an analysis of air quality impacts.
Policy 4.2.5: Emphasize trip reduction, alternative transit, and congestion management measures for discretionary projects.	Consistent. The Project would provide new residential units in an infill location that is walkable to public transportation, employment retail, restaurant, and entertainment uses. The Project would also provide bicycle parking and would maintain the existing pedestrian bridges connecting to adjacent uses.
Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures, including passive methods such as site orientation and tree planting.	Consistent . The Project would be designed and operated to meet the applicable requirements of the State of California Green Building Standards Code and City of Los Angeles Green Building Code. The Project would incorporate sustainability measures and performance standards including implementing a construction waste management plan to diver all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Council File 09-3029. As described above, the Project would include providing green space, landscaping, recreational amenities on three levels, and planting of 143 trees within the Project site and adjacent rights-of-way.
Policy 5.3.1: Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent. The Project would be designed and operated to meet the applicable requirements of the City of Los Angeles Green Building Code and provide the quantity of electric vehicle parking required by the City.

Emissions

Construction of the proposed Project is expected to last approximately 39 months and would fall into four principal phases: (1) demolition of existing uses; (2) building foundation; (3) structure construction; and

(4) exterior and interior finishing. Construction emissions were estimated according to the SCAQMD CEQA Air Quality Handbook and construction emission factors contained in the California Emissions Estimator Model (CalEEMod). The emission calculations assume the use of standard construction practices, such as compliance with SCAQMD Rule 403—Fugitive Dust, which requires all unpaved demolition and construction areas to be wetted at least three times a day during excavation and construction to minimize the generation of fugitive dust. In addition, SCAQMD Rule 1403 — Asbestos emissions from demolition/renovation activities, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities.

Construction of the Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from the Project site. In addition, fugitive dust emissions would result from various soil-handling activities. Mobile-source emissions, primarily NOx, would result from the use of construction equipment, such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions.

Each phase of construction would result in varying levels of intensity and a number of construction personnel. The construction workforce would consist of approximately 17 worker trips per day and 134 total hauling trips during demolition; 17 worker trips per day and 25 vendor trips per day during site preparation; 21 worker trips per day and 65 vendor trips per day during grading; 84 worker trips per day and 70 vendor trips per day during building construction; 147 worker trips per day and 45 vendor trips per day during paving.

The Project's maximum unmitigated daily emissions during construction are listed in **Table 6.3-3**: **Maximum Construction Emissions**; and unmitigated operational emissions are shown in **Table 6.3-4**: **Maximum Operational Emissions**. The analysis assumes that operation of all construction equipment for a given activity would occur simultaneously and continuously over the day. This would not actually occur, given that most equipment would operate only a fraction of each workday; moreover, many of the activities would not overlap on a daily basis. Therefore, the analysis represents a conservative scenario for construction activities. As shown in **Table 6.3-3**, emissions associated with construction would not exceed the applicable maximum daily SCAQMD thresholds for criteria pollutants. Furthermore, any asbestos or lead-based paint found from removal of the existing building would be properly removed and abated as required by State law, specifically Title 22 of the California Code of Regulations (CCR), the California Health and Safety Code, including the Hazardous Waste Control Law.

Operational emissions would be generated by both stationary and mobile sources from normal day-to-day activities associated with the Project. Stationary emissions would be generated by the consumption of natural gas for space- and water-heating equipment. Mobile emissions would be generated by motor

vehicles traveling to and from the Project site. The analysis of daily operational emissions has been prepared using the data and methodologies identified in the SCAQMD CEQA Air Quality Handbook and current motor vehicle emission factors in the CalEEMod model. The estimated emissions are based on development of all the proposed land uses on the Project site. As shown in **Table 6.3-4**, the emissions associated with the proposed Project would not exceed the SCAQMD recommended operational emission thresholds. The majority of emissions associated with Project operation (NOx and CO) are attributed to anticipated vehicular traffic traveling to and from the Project. Taking into account the removal of the existing uses, the overall net operational emissions would be below the applicable SCAQMD thresholds. As such, the Project would not conflict with or obstruct the implementation of the AQMP. Impacts would be less than significant.

Mitigation Measures

Incorporation of Prior Mitigation

Public Resources Code (PRC) Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Table 6.3-3

Project Mitigation

No additional project-specific mitigation measures are necessary.

Maximum Construction Emissions							
	VOC	NOx	СО	SOx	PM10	PM2.5	
Unmitigated Maximum	pounds/day						
Year 2020	4	45	23	<1	21	12	
Year 2021	11	31	30	<1	4	2	
Year 2022	11	28	29	<1	4	2	
Year 2023	10	17	25	<1	4	2	
Maximum	11	45	30	<1	21	12	
SCAQMD threshold	75	100	550	150	150	55	
Threshold Exceeded?	No	No	No	No	No	Νο	

Notes: Model assumed Tier 1 equipment

CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gases; SOx = sulfur oxides.

Refer to Air Quality Modeling Results in Appendix A.

	VOC	NOx	СО	SOx	PM10	PM2.5		
Source		pounds/day						
Area	15	1	47	<1	<1	<1		
Energy	<1	1	<1	<1	<1	<1		
Mobile	2	8	24	<1	9	2		
Total	17	10	71	<1	9	2		
Existing	1	2	6	<1	2	<1		
Net Total	16	8	65	<1	7	2		
SCAQMD threshold	55	55	550	150	150	55		
Threshold Exceeded?	No	No	No	No	No	No		

Table 6.3-4 Maximum Operational Emissions

Notes:

CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gases; SOx = sulfur oxides.

Refer to Air Quality Modeling Results in Appendix A.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard?

Less than Significant Impact. A significant impact could occur if the Project would add a considerable cumulative contribution to Federal or State nonattainment pollutants. The Basin is currently in State nonattainment for ozone, PM10, and PM2.5.³¹ In regard to determining the significance of the Project contribution, 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 impacts. Furthermore, SCAQMD states that "projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."³² Therefore, if a project generates less than significant construction or operational emissions, then the project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

³¹ California Air Resources Board (CARB), "Area Designation Maps/State and National," http://www.arb.ca.gov/desig/adm/adm.htm.

³² South Coast Air Quality Management District (SCAQMD), *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003),* Appendix A.
As discussed above, the Project would not generate construction or operational emissions that exceed SCAQMD's regional thresholds of significance. The Project would therefore not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant.

The SCAQMD devised the Localized Significance Threshold (LST) methodology³³ to assess the potential air quality impacts that would result in the near vicinity of the Project. This methodology considers emissions generated from on-site sources and excludes emissions from off-site vehicular traffic. The SCAQMD provides mass rate lookup tables as a screening tool to determine the likelihood of localized impacts from Project construction and operation. The lookup tables provide values for 1-, 2-, and 5-acre sites based on the geographic location of the Project and the proximity of sensitive receptors (i.e., schools, residences, hospitals, etc.). The Project is located in the Central Los Angeles County, SRA 1. As described above, the Project area is dominated by high-rise commercial office buildings and skyscrapers developed with park-like plazas.

Sensitive receptors are defined as schools, residences, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions who would be adversely impacted by changes in air quality. Sensitive receptors adjacent to the site include the mid- and high-rise office and hotel buildings to the north and northwest, across 3rd Street, and the L.A. Grand Hotel Downtown Building and the Westin Bonaventure Hotel & Suites to the south and west.

The screening criteria depend on: (1) the area in which the project is located, (2) the size of the project site; and (3) the distance between the project site and the nearest sensitive receptors (e.g., residences, schools, hospitals). The SCAQMD provides screening criteria distances of 25, 50, 100, 200, and 500 meters and allows for linear interpolation to estimate the screening criteria between these distances. The Project Site (3.7 acres) is located within Source Receptor Area (SRA) 1, which covers the Central Los Angeles

³³ South Coast Air Quality Management District, Final Localized Threshold Methodology, July 2008. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodologydocument.pdf?sfvrsn=2

County.³⁴ On-site emissions from construction activities and Project operations have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in **Table 6.3-5: Localized Significance Threshold (LST) Worst-Case Emissions**, peak daily emissions generated within the Project Site would not exceed the SCAQMD-recommended thresholds. Localized air quality impacts from construction and operational activities to the off-site sensitive receptors would be less than significant.

	NOx	СО	PM10	PM2.5
Source	pounds/day			
Construction				
Maximum daily emissions	42	22	20	12
LST threshold	179	8,637	190	110
Threshold Exceeded?	No	No	No	Νο
Operational				
Maximum daily emissions	2	8	<1	<1
LST threshold	179	8,637	46	27
Threshold Exceeded?	No	No	No	Νο

Table 6.3-5 Localized Significance Threshold (LST) Worst-Case Emissions

Source: Refer to Appendix A

Note: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

Carbon Monoxide Hot Spot Analysis

It should be noted that LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling along the roadways. 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 SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below C, and for any intersection operating at LOS D or worse where the project would increase the volume demand to capacity (V/C) ratio by two percent or more.³⁵

A stated in the Transportation Impact Report prepared for this project, attached as **Appendix F**, would not worsen the LOS of any of the study intersections below C, nor increase the V/C ratio by two percent of

³⁴ South Coast Air Quality Management District, SRA Monitoring Map, accessed July 2019, http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf

³⁵ SCAQMD, CEQA Air Quality Handbook, April 1993.

more for an intersection rated D or worse. Therefore, the Project would not have the potential to cause or contribute to an exceedance of the California 1-hour or 8-hour CO standards of 20 parts per million (ppm) or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard at any local intersection.

Based on the above, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. 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 in sewage treatment facilities and landfills. As the Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Good housekeeping practices, such as the use of trash receptacles, would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project's long-term operations phase.

During the construction phase, activities associated with the operation of construction equipment, the application of asphalt, and the application of architectural coatings such as paint and other interior and exterior finishes may produce discernible odors typical of most construction sites. Although these odors could be a source of nuisance to adjacent receptors, they are temporary and intermittent in nature. As construction-related emissions dissipate from the construction area, the odors associated with these emissions would also decrease, dilute, and become unnoticeable.

According to the SCAQMD *CEQA Air Quality Handbook*, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting refineries, landfills, dairies, and fiberglass molding.³⁶ The proposed Project would not include any of these or any other type of odor-producing uses. Odors associated with Project operation would be limited to on-site waste generation and disposal. All trash receptacles would be covered and properly maintained in accordance with City requirements to minimize odors. Impacts would be less than significant.

³⁶ SCAQMD, *Air Quality Handbook*, accessed July 2018, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The *CEQA Air Quality Handbook* identifies possible methods to determine the cumulative significance of land use projects. All of SCAQMD's methods are based on performance standards and emission reduction targets necessary to attain the federal and State air quality standards identified in the AQMP. The analysis presented above evaluates whether the project is consistent with the AQMP and thus, would not jeopardize attainment of State and federal ambient air quality standards in the Basin. In addition to the cumulative significance methodologies contained in *CEQA Air Quality Handbook*, SCAQMD staff has suggested that the emissions-based thresholds be used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. Individual projects that exceed SCAQMD-recommended daily thresholds for project-specific impacts would be considered to cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. As presented above in **Tables 6.3-3** through **6.3-5**, construction and operation of the Project would result in daily emissions that fall below thresholds of significance recommended by SCAQMD. Therefore, the contribution of these emissions to the air quality within the South Coast Air Basin is not considered to be cumulatively considerable, and thus a less than significant impact.

The proposed project's implementation would not result in any new exceedance of air pollution standards nor contribute significantly to an existing air quality violation. Furthermore, the analysis determined that the implementation of the proposed project would not result in any significant adverse air quality impacts. As a result, no significant adverse cumulative impacts would occur.

6.4 **BIOLOGICAL RESOURCES**

Wo	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
а.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			\boxtimes	
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				
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?				
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?				\boxtimes
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		\boxtimes		
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?				\boxtimes

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

Less than Significant. A project could have a significant impact on biological resources if it were to 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 to a degree that may diminish the chances for long-term survival of a sensitive species.

Due to the urbanized and previously disturbed nature of the Project Site and the surrounding areas, species likely to occur on site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of undisturbed wildlife habitat currently on the Project Site, it is unlikely any special-status species listed by the California Department of Fish and Wildlife or by the U.S. Fish and Wildlife Service would be present on site. Existing trees and shrubs may provide temporary habitat for migratory birds, which are protected under the federal Migratory Bird Treaty Act (MBTA). Additionally, Section 3503, 3503.5 and 3512 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). However, tree removal would be undertaken pursuant to applicable City permits and requirements and would be required to comply with existing federal and State laws (MBTA and California Fish and Game Code, respectively). Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The Project site is previously developed in an urbanized setting. According to the California Department of Fish and Wildlife's CNDDB data, no riparian or other sensitive natural community are located on or adjacent to the Project site.³⁷ The Project site is also not located within a significant ecological area as determined by the City or County of Los Angeles.³⁸ No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

³⁷ CDFW, CNDDB, "Maps and Data," https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data.

³⁸ *City of Los Angeles General Plan,* "Conservation Element" (2001), "Exhibit B2: SEAs [Significant Ecological Areas] and Other Resources," January 2001.

c. Would the project 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?

<u>No Impact.</u> A project could have a significant impact if it would result in the alteration of an existing wetland habitat. The Project site is entirely developed and largely covered with impermeable surfaces. The Project site is not in proximity to nor does it contain wetland habitat or a blue-line stream that is subject to the jurisdiction of the US Army Corps of Engineers or the CDFW. No federally protected streams, wetlands, or other water bodies, or any riparian habitat are located on or adjacent to the Project site.³⁹ Further, 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. No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. A project could have a significant impact on biological resources if it would result in interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project site has been previously developed and is located in a heavily urbanized area of the City and is not located near any natural open space areas used by wildlife for movement. There are no wildlife migration corridors in the vicinity of the Project site.⁴⁰ No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

³⁹ USFWS, National Wetlands Inventory, "National Wetlands Mapper," http://137.227.242.85/wetland/wetland.html.

⁴⁰ County of Los Angeles, General Plan 2035, Fig. 9.2: Regional Habitat Linkages, available at http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-2_Regional_Wildlife_Linkages.pdf.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant with Project Mitigation. 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.⁴¹ As described in the Tree Report included as **Appendix B** to this document, there are nonnative ornamental trees on or adjacent to the Project site that would be removed during construction. These trees are not protected species under the City of Los Angeles Protected Tree Ordinance. However, they are off-site and within the public right of way and thus subject to the Board of Public Works, Urban Forestry Division.

Mitigation Measures

In order to ensure that potential impacts to public trees are less than significant, the following mitigation measure shall be incorporated into the Project.

MM-BIO-1 Tree Removal (Nonprotected Trees)

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- Removal or planting of any tree in the public right(s)-of-way requires approval of the Board of Public Works. All trees in the public right(s)-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. A significant impact would occur if the Project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project site is not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.⁴² No impacts would occur.

⁴¹ City of Los Angeles Department of City Planning, Los Angeles Tree Ordinance (No. 177404), LAMC, sec. 12.21

⁴² CDFW, "NCCP Plan Summaries," accessed September 2018, https://www.wildlife.ca.gov/conservation/planning/nccp/plans.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The project would not involve any loss of protected habitat since no such habitat is found within the project site's boundaries. New street trees would be planted in accordance with City requirements. Related projects within the surrounding area of downtown Los Angeles would be subject to the same requirements. As a result, no cumulative impacts on biological resources would be associated with the proposed project's implementation. As such, the Project would not contribute to cumulative impacts on biological resources.

6.5 CULTURAL RESOURCES

Wa	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to section15064.5?			\boxtimes	
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to section15064.5?			\boxtimes	
c.	Disturb any human remains, including those interred outside of dedicated cemeteries?			\boxtimes	

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less than Significant Impact. Consistent with Section 15064.5(b) of the CEQA Guidelines, a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. Section 15064.5(a) of the CEQA Guidelines defines a historic resource as a resource that is (1) listed in, or determined to be eligible for listing, in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register.⁴³ The California Register automatically includes all properties listed in or formally determined to be eligible for listing the National Register of Historic Places (National Register).

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:

⁴³ CEQA Guidelines Section, 15064.5(a)(3).

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. 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; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

- 1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
- 2. It is associated with the lives of persons important to local, California, or national history; Or
- 3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
- 4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

The Los Angeles City Council adopted the Cultural Heritage Ordinance15 in 1962 and amended it in 2018 (Ordinance No. 185472). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission comprises five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The three criteria for HCM designation are stated below:

- 1. The proposed HCM is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, or community; or
- 2. The proposed HCM is associated with the lives of historic personages important to national, state, or local history; or
- 3. The proposed HCM embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs.

The Project site is not currently listed under national, state, or local landmark or historic district programs. It was not identified as being historic or potentially historic under federal, state, and local criteria in any historic resource surveys of the area. However, the current building on the property is approximately 45 years of age, the age at which it must be evaluated as a potential historical resource pursuant to CEQA. Therefore, the existing building on the Project site was evaluated to determine whether it meets the applicable standards to be deemed a potential historical resource within in the *Historical Resource Technical Report* prepared for the Project.⁴⁴

The existing building was determined not to eligible for listing in the National Register of Historic Places, California Register of Historical Resources, nor did it contain sufficient historical significance or architectural distinction to qualify as a Los Angeles Historic-Cultural Monument. It does not have an important association with the redevelopment of Bunker Hill, nor does it represent the history of Bunker Hill in any significant way. No individuals of historic significance were identified during the course of research that were associated with this building. The property has elements of both Late Modernism and Sculpturalist (Glass Skin) architecture. The World Trade Center possesses some of the character-defining features of the style, including lack of traditional ornamentation, integrated landscape elements (in this case, courtyards, and concrete planters), steel windows, and prominent signs (though nonoriginal, the building's existing signs are similar in placement, size, and configuration). However, the property is not an excellent example of the style. It lacks many of the stylistic features of Late Modern architecture, and the dominant visual element of the building is that of a typical and utilitarian concrete parking structure. Accordingly, the Project would not result in any direct impacts on a historical resource.

⁴⁴ GPA Consulting, *Historical Resource Technical Report* (October 2019); provided as **Appendix** C to this Initial Study.

There are five historical resources in the surrounding area: Bunker Hill Towers (222-234 S. Figueroa Street), Bank of America Plaza (333 S. Hope Street), Westin Bonaventure (404 S. Figueroa Street), Union Bank Building (445 S. Figueroa Street), and a portion of the Calvin S. Hamilton Pedway System. The threshold for determining significant impacts on historical resources is whether the proposed project would cause a substantial adverse change, which is defined as demolition, destruction, relocation, or alteration of the resource or its immediate vicinity such that the significance of the historical resource is materially impaired.

During construction, the pedestrian bridges attached to the building (part of the Calvin S. Hamilton Pedway system) may be altered, damaged, or removed but would be repaired or reinstalled in their original locations as part of the Project. The proposed work would comply with the Standards and therefore would have a less than significant impact on the pedway system as a historical resource.

None of the other historical resources in area would be affected by the Project, due to the physical and visual separation between these resources and the Project. As such, the Project would not cause a loss of integrity for any of these historical resources, and they would all continue to be eligible for listing as historical resources defined by CEQA. Therefore, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?

Less than Significant Impact. A significant impact could occur if grading or excavation activities associated with the Project would disturb unique archaeological resources that could exist within the Project site. A unique archaeological resource is defined as an artifact or object that meets any of the following criteria:

- 1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- 2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- 3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

The Project site was previously developed and minimal new ground disturbance activities are proposed. A records search of the California Historic Resources Information System (CHRIS) did not identify any unique archaeological finds on or adjacent to the Project site.⁴⁵ As such, the likelihood of unearthing unique archeological resources is considered low.

It is possible that unknown archaeological resources could exist at the Project Site and could be encountered during grading and excavation activities. Per California Public Resources Code Section 21083.2(f), a lead agency may make provisions for archeological sites accidently discovered during construction. The Project Applicant would be required to comply with the City's standard condition of approval related to inadvertent discovery of unknown archaeological resources. In the event that any subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with federal, state, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Compliance with this condition would ensure that Project impacts related to unknown archaeological resources would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. A significant adverse effect could occur if grading or excavation activities would disturb previously interred human remains, including those interned outside formal cemeteries. No known burial sites are located on or adjacent to the Project site.⁴⁶ While additional excavation of depths up to 30-feet will be necessary for new footings, excavation for the existing parking levels would likely have disturbed subsurface remains that may have been present. Furthermore, the Project Applicant shall be required to comply with existing regulations, including State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 that specify the measures to be taken if human remains are

⁴⁵ Tribal Cultural Resources Assessment, 350 South Figueroa, World Trade Center, City of Los Angeles, California, SWCA Environmental Consultants, March 2019 included as **Appendix G** to this Initial Study.

⁴⁶ See Tribal Cultural Resources Assessment, 350 South Figueroa, World Trade Center, City of Los Angeles, California, SWCA Environmental Consultants, March 2019 included as **Appendix G** to this Initial Study.

discovered during excavation, grading, or construction activities. If human remains are encountered, Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. If the County Coroner concludes that the remains are of Native American descent, the Native American Heritage Commission must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and handling of the remains. With regulatory compliance, any potential significant impacts of the Project related to this threshold would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

As discussed above, the Project would not result in indirect or direct impacts to any significant historical resource. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. All development in the City (including the proposed Project and related projects) that involves ground-disturbing activities is required to comply with the City's standard conditions of approval related to the discovery of artifacts during ground disturbance. For these reasons, the Project would not make a considerable contribution to significant cumulative impacts related to cultural resources. Impacts would be less than significant.

6.6 ENERGY

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

This section analyzes the Project's potential impacts on energy resources, focusing on three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). This analysis addresses both construction and operational impacts associated with the consumption of energy resources. This section evaluates the demand for energy resources attributable to the Project and determines whether the current and planned electrical, natural gas, and petroleum-based fuel supplies and distribution systems are adequate to meet the Project's forecasted energy consumption. The information presented herein is based, in part, on the California Emissions Estimator Model (CalEEMod) outputs as calculated for **Section 6.3: Air Quality**, and **Section 6.8: Greenhouse Gases**, and on the calculations for this section as presented in **Appendix D: Energy Calculations**.

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The determination of whether the project results in a significant impact on energy 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. A significant impact would occur if the Project required additional energy supply facilities and/or distribution infrastructure, creating significant direct or indirect impacts to the environment.

Construction

Construction of the proposed Project would require the use of various forms of energy. **Table 6.6-1: Summary of Energy Use during Construction**, summarizes the quantity of petroleum fuels and electricity

that would be consumed during construction. As shown in **Table 6.6-1**, a total of 12,283,800 gallons of diesel fuel, 48,097,334 gallons of gasoline fuel, and 216 kilowatt-hours of electricity would be consumed during construction. When compared to the worldwide oil supply in 2023 (buildout) of 103.9 million barrels per day,⁴⁷ and the City's 2023 (buildout) estimated power demand of 22,425 gigawatt-hours,⁴⁸ the oil and electricity usage during construction would be minimal.

Although construction would consume energy resources, construction activities would be temporary and would cease at the end of construction; therefore, there would be no long-term energy impacts associated with construction activities. The adopted energy conservation plans do not specifically discuss energy uses from construction activities. For this reason, and because the amount of fuel and electricity used during construction would be minimal and met by existing sources, impacts from construction would be less than significant.

Fuel Type	Quantity
Diesel	
On-site construction equipment	112,779 gallons
Off-site motor vehicles	12,171,021 gallons
Total	12,283,800 gallons
Gasoline	
On-site construction equipment	0 gallons
Off-site motor vehicles	48,097,334 gallons
Total	48,097,334 gallons
Electricity	216 kWh

Table 6.6-1Summary of Energy Use during Construction

Source: Meridian Consultants, November 2019, Appendix D.

Operation

During operation of the proposed Project, energy would be consumed for a variety of purposes, including electricity consumption for lighting, laundry equipment, appliances, HVAC equipment, water supply and

⁴⁷ Organization of the Petroleum Exporting Countries (OPEC), 2019 World Oil Outlook (September 2018). Available at https://www.opec.org/opec_web/en/publications/340.htm

⁴⁸ City of Los Angeles Department of Water and Power, 2018 Retail Electric Sales and Demand Forecast, November 5, 2018, Page 15, http://rates.ladwp.com/Admin/Uploads/Load%20Forecast/2019/04/2018%20Load%20Forecast_Final.pdf.

delivery, and other commercial operations; natural gas consumption for space heating, cooking, and laundry dryers; and transportation fuel consumption from motor vehicles driving to and from the site.

As discussed in, above, CalEEMod was run for the Project utilizing the baseline conditions, and for the proposed Project in order to produce a net difference. The output for CalEEMod, takes into account that the Project would meet Title 24 energy requirements, including installation of high-efficiency lighting and the use of low-flow appliances for water conservation.

Specific measures that would be implemented to achieve the CALGreen standards would be identified during the Project's design. Typical methods that could be incorporated into the Project design's to improve energy efficiency and meet CALGreen standards include use of efficient building techniques, such as insulation in walls and roofs, and use of high-performance glazing; installation of energy-efficient appliances, such as kitchen appliances and laundry rooms; high-efficiency lighting; design that maximizes reliance on natural lighting; and reduced water consumption through methods such as low-flow fixtures (faucets, showers, toilets) and water-efficient landscaping and irrigation.

Table 6.6-2: Summary of Annual Energy Use during Operation, summarizes the estimated annual energy consumption from operations for the proposed Project with incorporation of the energy conservation and efficiency measures that were previously described. Operation of the proposed Project would result in a permanent increase in electricity and natural gas consumption. Furthermore, the building would be built in compliance with the CALGreen ordinance, including reducing water consumption by at least 20 percent.

The availability of electricity depends on adequate general capacity of the grid and sufficient fuel supplies. LADWP estimates that electricity consumption within the City will be approximately 22,425 GWh per year by 2023, the anticipated Project buildout year.⁴⁹ As shown in **Table 6.6-2**, the proposed Project would use 2,877,115 kWh per year, which is 0.013 percent of the 2023 forecasted demand. LADWP expects to have adequate electricity supply and transmission capability to meet the needs of its customers well beyond 2023. Because the proposed Project would use a low percentage of the total electricity demand projected for the future and LADWP anticipates it will have sufficient capability to meet future needs, construction and operation of the proposed Project would not require the expansion of existing facilities or the construction of new electricity-generating or transmission facilities.

Natural gas consumption would increase during Project operations. The 2018 California Gas Report indicates that sufficient capacity exists in the utility network to meet future demand in Southern California.

⁴⁹ City of Los Angeles Department of Water and Power, 2018 Retail Electric Sales and Demand Forecast, November 5, 2018, Page 15, http://rates.ladwp.com/Admin/Uploads/Load%20Forecast/2019/04/2018%20Load%20Forecast_Final.pdf.

The total gas supply available in 2022, the latest year available, is estimated to be 2,519 MMcf per day,⁵⁰ equivalent to 2,569,380 million British thermal units (Btu) per year or 2,569,380,411 thousand Btu (kBtu).⁵¹ As shown in **Table 6.6-2**, the proposed Project would use approximately 4,946,565 kBtu per year, which is 0.19 percent of the 2022 forecasted demand. Because the proposed Project would use a low percentage of the total natural gas demand projected for the future and SoCalGas anticipates it will have sufficient capability to meet future needs, construction and operation of the proposed Project would not require the expansion of existing facilities or the construction of new natural gas facilities.

Source	Units	Project	Existing	Net Difference
Electricity				
General Office Building	kWh/yr	0	383,205	-383,205
Apartments High Rise	kWh/yr	2,257,250	0	2,257,250
Parking structure	kWh/yr	363,320	0	363,320
Building Subtotal	kWh/yr	2,620,570	383,205	2,237,365
Indoor water use	kWh/yr	483,571	68,271	415,300
Outdoor water use	kWh/yr	260,152	35,702	224,449
Water Subtotal	kWh/yr	743,723	103,973	639,750
Electricity Total	kWh/yr	3,364,293	487,178	2,877,115
Natural Gas				
General Office Building	kBtu/yr	0	307,095	-307,095
Apartments High Rise	kBtu/yr	5,253,660	0	5,253,660
Parking structure	kBtu/yr	0	0	0
Natural Gas Total	kBtu/yr	5,253,660	307,095	4,946,565
Mobile				
Diesel	Gallons	24,434	4,198	20,235
Gasoline	Gallons	158,356	27,210	131,146

Table 6.6-2 Summary of Annual Energy Use during Operation

Source: Meridian Consultants, November 2019, Appendix D.

Notes: kWh/yr = thousand kilowatt-hours per year, kBtu/yr = thousand British Thermal Units per year

Electricity and Natural Gas for the Project is total operational usage. Net difference, takes total Project usage and subtracts existing uses. Mobile gasoline and diesel usage was calculated using VMT which was provided by CalEEMod outputs.

50 California Gas and Electric Utilities, 2018 California Gas Report (2018). Available at https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf.

⁵¹ *The Climate Registry,* "Table 12.1: U.S. Default Factors for Calculating CO2 Emissions from Fossil Fuel and Biomass Combustion" (April 2015), Available at https://www.theclimateregistry.org/wp-content/uploads/2016/03/2015-TCR-Default-EFs.pdf.

Although operation of the proposed Project would increase electricity and natural gas consumption, the Project would be designed and operated in accordance with the applicable State Building Code Title 24 regulations and City of Los Angeles Green Building code, which impose energy conservation measures. Adherence to the aforementioned energy requirements will ensure conformance with the State's goal of promoting energy efficiency. Energy Commission staff estimates that the implementation of the 2016 Building Energy Efficiency Standards may reduce Statewide annual electricity consumption by approximately 281 gigawatt-hours per year, electrical peak demand by 195 megawatts, and natural gas consumption by 16 million therms per year.⁵² As such, impacts of the Project would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. As stated above, the Project would be designed and operated in accordance with the with applicable State Building Code Title 24 regulations and City of Los Angeles Green Building code, which impose energy conservation measures. As such, the Project would not conflict with energy efficiency plans. Impacts would be less than significant.

Mitigation Measures

Project Mitigation

No project-specific mitigation measures are necessary.

<u>*Cumulative Impacts*</u>: The proposed project's implementation would not result in any new energy sources. As a result, no significant adverse cumulative impacts would occur.

Cumulative Impacts

Buildout of the Project, and related projects, would cumulatively increase the demand for energy. However, the Project would be consistent with growth expectations for the region utilized by energy providers to manage power generation and other facilities. As the Project is consistent with these forecasts, it would not make a considerable contribution to cumulative impacts on energy systems.

⁵² California Energy Commission, 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (June 2015, https://www.energy.ca.gov/2015publications/CEC-400-2015-037/CEC-400-2015-037-CMF.pdf.

6.7 GEOLOGY AND SOILS

Wa	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	 Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42. 				
	ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?			\boxtimes	
	iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?			\boxtimes	
	iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?			\boxtimes	
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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?				
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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?				

Wc	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				\boxtimes
f.	Directly or indirectly destroy a unique paleontological resource or site unique geologic feature?				

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 could occur if a project were located within a Statedesignated Alquist-Priolo Zone or other designated fault zone. According to the City's General Plan, the Project site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act.⁵³ Additionally, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, nor do any known active faults cross the Project site.⁵⁴ The closest potentially active fault is the Puente Hills Blind Thrust, located approximately one mile from the Project site. The potential risk for surface fault rupture through the Project site is considered low. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

ii. Strong seismic ground shaking?

Less than Significant Impact. A significant impact could occur if a project were to represent an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to

⁵³ City of Los Angeles, *General Plan*, "Safety Element" (1996).

⁵⁴ California Department of Conservation, *Regulatory Maps: Beverly Hills Quadrangle*, PDF Map, "Earthquake Zones of Required Investigation Beverly Hills Quadrangle," accessed July 2018, http://maps.conservation.ca.gov/cgs/informationwarehouse/.

seismically induced ground-shaking hazards that are greater than the average risk associated with other locations in Southern California. The Project site is not located within a seismic hazard zone for land sliding or faulting; however, it is in a zone for liquefaction.⁵⁵ The 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. The Project would conform to all applicable provisions of the California Building Code seismic standards with respect to new construction, as approved by the Department of Building and Safety. Specifically, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Adherence to applicable building codes, agency guidance, and engineering practices would ensure that the Project would not expose people, property, or infrastructure to seismically induced ground-shaking hazards that represent an increased risk associated with locations in the Southern California region. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. A significant impact could occur if a project site were located within a liquefaction zone and thereby were to represent an increased risk to public safety or destruction of property by exposing people, property, or infrastructure As stated in the City's General Plan "Safety Element," and as noted in the City's parcel information report, the Project site is located within an area identified as having the potential for liquefaction. The Project is an addition to an existing structure and would conform to all applicable provisions of the California Building Code seismic standards with respect to new construction, as approved by the Department of Building and Safety. Specifically, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

⁵⁵ City of Los Angeles, Department of City Planning, *General Plan*, "Safety Element" (1996). Exhibit B.

iv. Landslides?

No Impact. A project-related, significant adverse effect could occur if the project were located in a hillside area with soil conditions that would suggest a high potential for sliding. The Project site is on relatively level terrain and is not in a designated earthquake-induced landslide hazard zone.⁵⁶ There is also no risk of landslides from other causes. Therefore, the probability of landslides is considered to be low. No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Although development of the Project site has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. No grading is planned as part of the project. The potential for soil erosion during the ongoing operation of the Project is extremely low due to the predominantly level topography of the site; furthermore, the Project site would be almost entirely built upon, with little or no soil exposed. For these reasons, Project impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less than Significant Impacts. As previously discussed, the Project site is located within a liquefaction zone. The Project is an addition to an existing structure. Code requirements to prevent soil erosion and liquefaction would be implemented. Specifically, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. For all these reasons, Project impacts would be less than significant.

⁵⁶ California Geological Society, Earthquake Zones of Required Investigation, interactive map, accessed August 2018, https://maps.conservation.ca.gov/cgs/EQZApp/app/.

Mitigation Measures

No project-specific mitigation measures are necessary.

d. Would the project be located on expansive soil, as defined in Table 18 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less than Significant Impact. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and that 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.

Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, Los Angeles Municipal Code and other applicable building codes which includes building foundation requirements appropriate to site-specific conditions. Specifically, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismicrelated hazards. Therefore, Project impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project site is in a developed area that is served by the wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. The Project's wastewater demand would be accommodated via connections to this existing wastewater infrastructure. No septic tanks or alternative disposal systems would be utilized. For all these reasons, no impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. A significant impact could occur if grading or excavation activities associated with the Project were to disturb unique paleontological resources or geologic features that presently exist within the Project site. The Project site has been previously graded and is currently improved with an existing commercial retail building and related surface parking. No new grading would be required. While additional excavation of depths up to 30-feet will be necessary for new footings, excavation for the existing parking levels would likely have disturbed subsurface resources that may have been present. As such, the likelihood of unearthing unique paleontological resources is considered low. Furthermore, the Project Applicant would be required to comply with the City's standard condition of approval related to the inadvertent discovery of subsurface resources. In the event that any paleontological resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. With compliance with the condition of approval, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project would add to an existing structure. Geotechnical impacts tend to be site specific and not additive. All development in the City (including the proposed Project and related projects) that involves ground-disturbing activities is required to comply with the City's codes and requirements for building design and construction management. As such, the Project would not make a considerable contribution to cumulative geology and soils impacts.

6.8 GREENHOUSE GAS EMISSIONS

Wo	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

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. A significant impact could occur if the Project: (1) would generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment; or (2) conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. GHG emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere, and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation, and temperature. Although scientists disagree as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that a direct link exists between increased emission of GHGs and long-term global temperature.

There are no federal, State, or local quantitative adopted thresholds of significance for addressing a residential project's GHG emissions. Although estimated GHG emissions have been quantified, the California Air Resources Board (CARB), SCAQMD, and the City of Los Angeles have yet to adopt quantitative, project-level significance thresholds for GHG emissions that would be applicable to the Project. Assessing the significance of a project's contribution to cumulative global climate change involves: (1) evaluating the project's sources of GHG emissions; and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth by the lead agency or other regional state agency.

Operation

Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, as well as waste management would occur every year after full development of the uses allowed by the Project. This section addresses operational GHG emissions.

Area Sources

The area source GHG emissions included in this analysis result primarily from natural gas fireplaces with additional emissions from landscaping-related fuel combustion sources, such as lawn mowers. GHG emission due to natural gas combustion in buildings other than from fireplaces are excluded from area sources since they are included in the emissions associated with building energy use.

Consumer products are various solvents used in nonindustrial applications which emit Reactive Organic Gases (ROGs) during their product use. Consumer products include cleaning supplies, kitchen aerosols, cosmetics, and toiletries. All land use buildings are assumed to be repainted at a rate of 10 percent of area per year. This is based on the assumptions used by SCAQMD. However, CalEEMod does not consider architectural coatings and consumer products to be sources of GHG.

Energy Sources

GHGs are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emission in an indirect manner.

Estimated emissions from the combustion of natural gas and other fuels from the implementation of the Project are calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for Southern California Edison were selected in CalEEMod. Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

Mobile Sources Emissions

Vehicle trips generated by growth within the Plan area would result in operational emissions through the combustion of fossil fuels. O₂ emissions were determined based on the Project's daily trips (refer to **Section 4.17: Transportation and Traffic**. The vehicle miles travelled (VMT) takes into account internal and external trips. The City is served by multiple transit operators, specifically within the vicinity of the Plan area, with networks connecting different communities within and outside of City boundaries. The primary transit operator is Metrolink, which operates six commuter rail lines throughout Southern California. The Omnitrans Transit Agency provides local transit service throughout San Bernardino County, including within the City boundaries.

Solid Waste Emissions

Solid waste generation and associated emissions are calculated based on the square footage of the Plan Area, using default data found in CalEEMod for the proposed land uses. Disposal of organic waste in landfills can lead to the generation of CH4, a potent GHG. By generating solid waste, the Plan would contribute to the emission of fugitive CH4 from landfills, as well as CO2 and N2O from the operation of trash collection vehicles.

Water Consumption and Wastewater Emissions

California's water conveyance system is energy intensive, with electricity used to pump and treat water. The Project will result in indirect GHG emissions due to water consumption and wastewater generation. Water consumption and wastewater generation, and their associated emissions, are calculated based on the square footage of the Plan Area, using CalEEMod data.

Emissions

Construction and operational GHG emissions were modeled using CalEEMod for each year of construction of the Project and for the typical year of operation. The estimated emissions from existing uses on the site were subtracted from the estimated emissions resulting from the Project in order to calculate a potential net change in emissions. The results of this analysis are presented in **Table 6.8-1: Proposed Project Greenhouse Gas Emissions**. As shown, when taking into account the removal of the existing uses, the net increase in GHG emissions generated by the Project would be 3,430 MTCO2e per year.

The City adopted the LA Green Plan to provide a Citywide plan for achieving the City's GHG emissions targets, for both the existing and future generations of GHG emissions. To further implement the LA Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code as it applies to new development projects.

	Unmitigated	Regulatory Compliance	Reduction
GHG Emissions Source		MTCO₂e/year	
Construction (amortized)	86	86	
Operational (mobile) sources*	1,618	1,548	70
Area sources	10	10	
Energy	1,745	1,696	49
Waste	132	40	92
Water	466	372	94
Annual Total	4,057	3,752	305 (9%)
Existing	627	627	
Net Total	3,430	3,125	305

Table 6.8-1 Project Operational Greenhouse Gas Emissions

Source: CalEEMod.

Notes: Emissions calculations are provided in Appendix A.

Totals in table may not appear to add exactly due to rounding in the computer model

MTCO₂e = metric tons of carbon dioxide emissions.

* N2O emissions account for 0.03 MTCO2e/year.

With respect to new development, the City adopted the LA Green Building Code (Ordinance No. 181480), which incorporates applicable provisions of the CALGreen Code, and in some cases outlines stricter GHG reduction measures available to development projects in the City of Los Angeles. Among the many GHG reduction measures outlined later in this section, the LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation; to meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008; and to meet 50 percent construction waste recycling levels. The Scoping Plan encourages communities to adopt building codes that go beyond the State code. Accordingly, as the LA Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development project that can demonstrate that it complies with the LA Green Building Code is considered consistent with Statewide GHG reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

The Project would be consistent with the City of Los Angeles goals and actions to reduce the generation and emission of GHGs from both public and private activities pursuant to the applicable portions of the AB 32, Senate Bill (SB) 375, and the LA Green Building Code. As such, impacts would be less than significant.

calculations.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. The goal of AB 32 is to reduce Statewide GHG emissions to 1990 levels by 2020. As previously noted, in 2014, the CARB updated the Scoping Plan, which details strategies to meet that goal. On September 8, 2016, Governor Brown enacted SB 32 that extends AB 32 another ten years to 2030 and expands upon the State's objectives. SB 32 calls on Statewide reductions in GHG emissions to 40 percent below 1990 levels by 2030. In addition, AB 197 requires CARB to approve a Statewide GHG emissions limit equivalent to the Statewide GHG emission level in 1990 to be achieved by 2030. SB 32 requires ARB to prepare and approve a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions.

SCAG RTP/SCS 2016–2040

The 2016 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions of 9 percent by 2020 and 16 percent by 2035.⁵⁷ Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.⁵⁸

The 2016 RTP/SCS would result in an estimate 8 percent decrease in per capita passenger vehicle GHG emissions by 2020, 18 percent decrease in per capita passenger vehicle GHG emissions by 2035, and 21 percent decrease in per capita passenger vehicle GHG emissions by 2040. In March 2018, CARB adopted updated targets requiring a 19 percent decrease in VMT for the SCAG region by 2035. As the CARB targets were adopted after the 2016 RTP/SCS, it is expected that the updated targets will be incorporated into the next RTP/SCS. The 2016 RTP/SCS and/or the next RTP/SCS are expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2016 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2016 RTP/SCS would result in more complete communities with a variety of transportation and housing choices,

⁵⁷ CARB, Regional Greenhouse Gas Emission Reduction Targets Pursuant to SB 375, Resolution 10-31.

⁵⁸ SCAG, Final 2016–2040 RTP/SCS, April 2016, p. 153.

while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2016 RTP/SCS can be grouped into the following two categories: (1) integrated growth forecast; and (2) reduction of vehicle trips and VMT.

The 2016 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The population increase within the City between 2012 and 2040 was forecasted to be 763,900. As discussed in **Section 3.0** above, the construction of 570 new multifamily residential dwelling units would result in an estimated increase of approximately 1,077 new residents in the Bunker Hill and downtown area. This would yield to approximately 0.1 percent of the anticipated increased projected within the City. This increase would not result in population and housing growth that would cause growth within the City to exceed the SCAG population forecast.

As mentioned previously, the Project would meet the mandatory Green Building standards and exceed Title 24 requirements. These features are also consistent with the SCAG RTP/SCS MM-GHG-3(b) which requires a reduction in emissions resulting from a project features, design, or other measures. As such, the Project would be consistent policies listed in the SCAG RTP/SCS.

Sustainable Communities and Climate Protection Act (SB 375)

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. This act requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that prescribes land use allocation in that MPO's regional transportation plan (RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035. In addition, SCAG's landfill capacity MM-USS-6(b) states that 75 percent of the waste stream would be recycled and waste reduction goal by 50 percent that are within responsibility set forth by the City.⁵⁹ As discussed previously, the Project would be within the population forecasts.

Green Building Standards (CALGreen) Code

In November 2008, the California Building Standards Commission established the California Green Building Standard Code (CALGreen Code), which sets performance standards for residential and nonresidential development to reduce environmental impacts and encourage sustainable construction practices. As of January 1, 2011, the CALGreen Code is mandatory for all new building construction in the State. The

⁵⁹ SCAG, *Mitigation Monitoring and Reporting Program*, Adopted April 2016, http://scagrtpscs.net/Documents/2016/peir/final/2016fPEIR_ExhibitB_MMRP.pdf.

CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

In December 2010, the Los Angeles City Council adopted various provisions of the CALGreen Code as part of Ordinance No. 181,480, thus codifying certain provisions of the CALGreen Code as the new Los Angeles Green Building Code (LA Green Building Code). The LA Green Building Code imposes more stringent green building requirements than those contained within the CALGreen Code and is applicable to the construction of every new building, every new building alteration with a permit valuation of over \$200,000, and every building addition unless otherwise noted. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. In 2016, the Los Angeles City Council adopted the 2017 Los Angeles Green Building Code, which is in effect as of January 1, 2017. The 2017 Los Angeles Green Building Code contains mandatory measures for residential and nonresidential development related to site development; water use; weather resistance and moisture development; construction waste reduction; disposal and recycling; building maintenance and operation; pollutant control; indoor air quality; environmental comfort; outdoor air quality; and electric vehicle charging requirements. Furthermore, as mentioned above, the Project would reduce total energy consumption by 34 percent and would have a 75 percent of waste stream to be recycled.

City of Los Angeles Sustainable City pLAn

On April 8, 2015, the City of Los Angeles released the Sustainable City pLAn ("pLAn") which defines a roadmap for actions to be taken by the City over the next 20 years to create a City that is environmentally healthy, economically prosperous, and equitable in opportunity. The pLAn addresses increasing local water and solar energy resources, energy efficiency in new buildings, carbon and climate leadership and waste and landfills.

On carbon and climate leadership, the pLAn states that the City will reduce GHG emissions below the 1990 levels called for by state law by 2020. The City's objectives are to reduce GHG emissions below 1990 baseline by at least 45 percent by 2025, 60 percent by 2035 and 80 percent by 2050. By 2017, the City will develop a comprehensive climate action and adaptation plan. Strategies and policy initiative include creating a benchmarking policy for building energy use, and incentivizing or requiring LEED Silver or better for new construction.

The Project would be consistent with the planed land use and population growth within the area and would not conflict with the AQMP. Through required implementation of the LA Green Building Code, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation

of GHGs. Further, the Project would meet the 2016 Title 24, Part 6 Standard. As such, the Project's generation of GHG emissions would not make a cumulatively considerable contribution to or conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gasses. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

GHG emissions are cumulative in nature, as their impact is associated with global climate change. As such, the evaluation of Project impacts is also the determinant of whether a Project has a considerable contribution to cumulative effects. The analysis herein determined that the implementation of the proposed project would not result in any significant adverse impacts related to the emissions of greenhouse gases. As a result, the Project would also not have a considerable contribution to significant cumulative impacts.

6.9 HAZARDS AND HAZARDOUS MATERIALS

Wo	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			\boxtimes	
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?			\boxtimes	
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 caused in whole or in part from the project's exacerbation of existing environmental conditions?				
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?				\boxtimes

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, transmission fluids, solvents, and

other acidic and alkaline solutions that would require special handling, transport, and disposal. However, all potentially hazardous materials would be used and stored in accordance with applicable federal, State, and local regulations. Residential uses involve the routine use of household products some of which contain small quantities of hazardous materials. However, the routine use and disposal of normal household products is not considered to create a significant hazard to the public or the environment. As such, the Project would not create a significant hazard to the public or the environment. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

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. During the operation of the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. However, it is expected that all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. 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.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. East College Prep, a charter school for grades 9-12, is located on the Project site. In addition, the American University Preparatory School is located approximately 40 feet west of the Project site across Figueroa Street No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for residential housekeeping, maintenance and other janitorial purposes would
be present at the Project site and use of these substances would comply with Health and Safety Code Section 25501(o). The Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

<u>No Impact</u>. A significant impact may occur if a project site is included on any Statewide list and poses an environmental hazard to surrounding sensitive uses. California Government Code Section 66962.5 requires various State agencies including but not limited to, the Department of Toxic Substances Control (DTSC) and SWRCB, to compile list of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.⁶⁰ Based on a review of these databases, the Project site is not located on a list of hazardous materials sites compiled pursuant to Section 65962.5. In addition, a Phase 1 Site Assessment, prepared for the Project Site, found no recognized environmental conditions associated with the site.⁶¹ As such, no impact would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

e. For a project located within an airport land use plan or, where such plan has not been adopted, within 2 miles of a public airport or public use

⁶⁰ These lists include, but are not limited to the 'EnviroStor' database (https://www.envirostor.dtsc.ca.gov/public/) and Geotracker list (https://geotracker.waterboards.ca.gov/)mainatained by DTSC and SWRCB respectively.

⁶¹ Phase I Environmental Site Assessment, World Trade Center 350 South Figueroa Street, AE West Consultants Inc, May 31, 2005

airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The closest public airports to the Project site are the Hollywood Burbank Airport, Santa Monica Airport, and Los Angeles International Airport (LAX). However, none of these airports are located within two miles of the Project site, nor is the site located in an airport land use plan or airport hazard area. No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

f. Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact.

The Project site is bound by Figueroa Street to the northwest, 3rd Street to the northeast, 4th Street to the southwe2st, and Flower Street to the southeast. Figueroa Street is a selected disaster route as identified by the City's General Plan.⁶² While it is expected that the majority of construction activities for the Project would be confined to the Project site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which may result in temporary lane closures that could have the potential to interfere with established emergency response or evacuation plans. However, any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. As discussed in Section 4.17, Transportation, the Project would implement a Construction Traffic Management Plan. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

⁶² City of Los Angeles General Plan "Safety Element" (1996), Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles.

g. Would the project 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 an urbanized area of Los Angeles that does not contain wildlands or high fire hazard terrain or vegetation. The Project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).⁶³ No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project and related projects would be subject to the same regulatory requirements. As stated previously, the Project site does not contain any recognized environmental conditions and the Project would not result in any significant impacts related to hazards and hazardous materials. As such, the Project would not have a considerable contribution to cumulative impacts.

⁶³ City of Los Angeles Department of Planning, *Zone Information and Map Access System*, accessed July 2018, http://zimas.lacity.org/.

6.10 HYDROLOGY AND WATER QUALITY

Wo	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			\boxtimes	
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:				
	i. Result in substantial erosion or siltation on or off-site?			\boxtimes	
	ii Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			\boxtimes	
	 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 			\boxtimes	
	iv. Impede or redirect flood flows?				\square
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				\square

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than Significant Impact. For the purpose of this specific threshold, a significant impact may occur if the project would discharge water that does not meet the quality standards of local agencies that regulate surface water quality and water discharge into stormwater drainage systems.

Construction Impacts

During construction and demolition activities stormwater runoff from the Project site could cause erosion and/or transport sediment off site and into municipal storm drain systems. Thus, pollutant discharges associated with the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could result in adverse impacts to water quality. The Project would be required to comply with the NPDES General Construction Permit including the preparation of a SWPPP and implementation of BMPs, required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements.

Operation Impacts

Operation of the proposed Project would introduce sources of potential stormwater pollution that are typical of commercial and residential uses. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would require a Low Impact Development (LID) Plan. The LID Plan is a document developed to control pollutants, pollutant loads, and runoff volume being released from the Project site by minimizing the impervious surface area and controlling runoff from impervious surfaces; it applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. The Project is expected to comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB).

The proposed Project would generate wastewater that would be conveyed via municipal sewage infrastructure maintained by the City of Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP), a public facility subject to the state's wastewater treatment requirements. The proposed Project

would generate wastewater similar to that generated by existing mixed-use buildings throughout the City with pollutant loads typical of urban wastewater already processed by the HTP. Thus, operation of the proposed Project would not violate waste discharge requirements.

Compliance with the LID Plan would reduce the amount of surface water runoff leaving the Project site compared to runoff under current conditions. Compliance with existing regulations, such as the LID Plan and MS4, including the implementation of BMPs, would ensure that operation of the proposed Project would not violate any water quality standards or waste discharge requirements. Construction and operation of the proposed Project would not violate any water quality standards any water quality standards or waster quality standards or waster discharge requirements. As such, impacts would be less than significant,

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. A project could 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.⁶⁴

The Project site is generally impervious with the exception of some portions of landscaping along the public rights-of-way. As such, surface water runoff from the Project site is directed to adjacent storm drains and generally does not percolate into the groundwater table beneath the Project site. The Project is not adjacent to a well field nor part of a groundwater recharge area. Furthermore, during nearby site investigations, groundwater was not encountered at depths of up to 100 feet.⁶⁵ As such, Project construction would not reach the groundwater level. As such, the Project Site is not a source of substantial groundwater recharge. Impacts would be less than significant

⁶⁴ L.A. CEQA Thresholds Guide.

⁶⁵ Preliminary Geotechnical Assessment Proposed Residential Tower 350 South Figueroa Street Los Angeles California, Geotechnologies Inc, December 2018 page 3

Mitigation Measures

No project-specific mitigation measures are necessary.

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

i. result in substantial erosion or siltation on or off site;

Less Than Significant Impact. A significant impact could occur if the Project substantially altered the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on-or off-site. The Project Site is located in a highly urbanized area of the City. There are no natural watercourses on the Project Site or in the vicinity of the site. The Project Site is currently developed with impervious surfaces and the Project would also be completely impervious. As such, the drainage patterns would be the same as under the existing condition -- stormwater runoff would flow to the local storm drain system.

During construction, the Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The SWPPP would include best management practices (BMPs) and erosion control measures. The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities.

In addition, the Project would be required to implement a Low-Impact Development (LID) Plan which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPS to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period.

Therefore, the Project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site.

Mitigation Measures

No project-specific mitigation measures are necessary.

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. The Project site is largely developed with impervious surfaces. Implementation of the Project would not increase site runoff or result in changes to the local drainage patterns. Implementation of a SWPPP for the Project would reduce the amount of surface water runoff after storm events because the Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing three-quarters of an inch of rainfall in a 24-hour period in compliance with the City's LID Ordinance. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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 could occur if the Project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site, or if the Project would introduce substantial new sources of polluted runoff. Runoff from the Project Site currently is and would continue to be collected on the site and directed towards existing storm drains in the Project vicinity that have adequate capacity to serve the site. Currently, drains and catch basins maintained by the City are located on Hill Street, adjacent to the Project Site's southwestern boundary. Pursuant to local practice and City policy, stormwater retention would be required as part of the SWPPP during construction and LID implementation features during operation of the Project. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, pollutants from the subterranean parking garage and surface parking lot would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. The Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant. The Project would not result in a significant increase in site runoff or any changes in the local drainage patterns. Runoff from the Project site currently is, and would continue to be, collected on the site, and directed toward existing storm drains in the Project vicinity. The Project would not create or contribute runoff water that would exceed the capacity of existing or planned

stormwater drainage systems or provide substantial additional sources of polluted runoff. With compliance with regulatory requirements Project impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

iv. impede or redirect flood flows?

No Impact. A significant impact could occur if the Project site 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.⁶⁶ The Project site is located in a highly urbanized area, and no changes to the local drainage pattern would occur with implementation of the Project; therefore, the Project would not have the potential to impede or redirect floodwater flows. No impact would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

<u>No Impact</u>. A significant impact would occur if the Project Site were sufficiently close to the ocean or other water body to potentially be at risk of seismically induced tidal phenomena (e.g., seiche and tsunami), or was within a flood zone, and if the Project Site utilized, stored, or otherwise contained pollutants that would be at risk of release if inundated. The Project Site is not located within a Tsunami Inundation Zone or Flood Zone.⁶⁷ Furthermore, the proposed use does not involve the storage or use of substantial quantities of potential pollutants that could be released during a flood event. No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. Under the California Water Code, the State of California is divided into nine regional water quality control boards (RWQCBs), which govern the implementation and enforcement of the California Water Code and the Clean Water Act. The Project Site is located within Region 4, also known as the Los Angeles Region, (LARWQCB). The LARWQCB Water Quality Control Plan: Los Angeles Region Basin Plan for

⁶⁶ City of Los Angeles General Plan Safety Element, Exhibit F.

⁶⁷ City of Los Angeles Parcel Profile Report, http://zimas.lacity.org.

the Coastal Watersheds of Los Angeles and Ventura Counties, September 11, 2014, is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. Under the NPDES permit enforced by the LARWQCB, all existing and future municipal and industrial discharges to surface waters within the City of Los Angeles are subject to applicable local, State and/or federal regulations. The Project must comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the LARWQCB. The Project would comply with and not obstruct implementation of the LARWQCB Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. As described earlier, the Project would comply with the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring, and reporting program requirements, and general compliance determination criteria for groundwater discharges. The Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and in the City's LID ordinance. Project construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to avoid or reduce the effects of sedimentation and erosion. In addition, the Project would require approval of an erosion control plan and would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the NPDES permit. The SWPPP incorporates best-management practices (BMPs) in accordance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities to control erosion including grading and dust control measures. Conclusion: The Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant and no mitigation measures are required.

Mitigation Measures

No project-specific mitigation measures are necessary.

<u>Cumulative Impacts</u>: The potential impacts related to hydrology and storm water runoff are typically site specific. As discussed throughout the section, the Project would comply with existing regulations pertaining to hydrology and water quality and the implementation of the proposed project would not

result in any significant adverse impacts related to hydrology. As a result, no cumulative impacts are anticipated.

Cumulative Impacts

The Project is located in an urbanized area. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. New construction does not lead to substantial additional runoff, since new developments is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, Project the cumulative would not have a considerable contribution to cumulative impacts.

6.11 LAND USE AND PLANNING

Wc	uld the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Physically divide an established community?				\square
b.	Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				

a. Would the project physically divide an established community?

No Impact. A significant impact could occur if the Project were configured in such a way as to create a physical barrier within an established community. The Project site is located in an urbanized area and currently developed with office building and commercial building standing at 8 levels above podium and 5 levels above grade, respectively. The Project would be consistent with the scale, massing, character, and existing physical arrangement of the development in the vicinity of the Project site. Moreover, because the Project would consist of an infill development on any existing site that would replace a portion of an existing building, it would not divide an established community. Therefore, no impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project 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 could occur if a project is inconsistent with planning or zoning designations currently applicable to the project site adopted for the purpose of avoiding or mitigating an environmental effect. The Project site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the designations and regulations of local land use and zoning plans, as summarized below, and associated. In addition, project implementation would not occur without the General Plan Amendment and Change of Zone proposed.

City of Los Angeles General Plan. The land use component of the City of Los Angeles General Plan is set forth in the Framework Element and in Community Plans. The Framework sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing,

urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through community plans and specific plans. The General Plan Framework Land Use chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City's residential neighborhoods and commercial districts. The Project site is not within a designated district in the Framework. The Project is within the Central City Community Plan area, the Bunker Hill Specific Plan area, the Greater Downtown Housing Incentive Area, and is designated for Regional Center Commercial land use. The stated intent of the Community Plan is to enhance the positive characteristics of residential neighborhoods while providing a variety of housing opportunities. The Community Plan also aims to improve the function, design, and economic vitality of commercial areas, maximize development opportunities around existing and future transit systems, and preserve and strengthen commercial developments to provide a diverse job-producing economic base. The Project would develop a residential building in place of an office and commercial building and would therefore conform to the goals, objectives, and land uses identified in the Community Plan and the General Plan as listed below in Table 6.11-1: City of Los Angeles Applicable General Plan Consistency.

SCAG Regional Transportation Plan/Sustainable Communities Strategy. As discussed in **Section 3.0** of this document, the Project would be consistent with policies set forth in SCAG's RTP/SCS.

Zoning Regulations, Los Angeles Municipal Code. The Project site is zoned C4-4D (Commercial), which permits a range of commercial and residential uses by right and limits the FAR to 6:1 without restriction to building height. The Project would contain permitted uses and an FAR of 5.8:1.

As such, the Project would not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect

Mitigation Measures

Project Mitigation

No project-specific mitigation measures are necessary.

Cumulative Impacts

As discussed, the Project would not result in any inconsistencies with plans, policies, or regulations. As such, the Project would not contribute to cumulative impacts.

Table 6.11-1

City of Los Angeles Applicable General Plan Consistency

Plan Objectives	Project Consistency
City of Los Angeles General Plan Framework	
Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents in the City.	Consistent. The proposed Project would provide new residential uses, in the City on top of existing other commercial uses. Therefore, providing additional households and commercial uses for residents and visitors to the City. As such, the Project would be consistent with this policy.
Objective 4.1: Plan the capacity for and develop incentives to encourage production for an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level for the future population to the year 2010.	Not Applicable. Though the Project would develop new housing units to meet future projected housing needs, this objective is outdated.
Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	Consistent. The proposed Project would provide new commercial uses on the ground floor, under residential uses above. It is located in Downtown Los Angeles
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost and within each City subregion to meet the twenty-year projections of housing needs.	Consistent: The Project would provide new housing units that would contribute to meeting the City's housing needs.
Policy 4.1.6: Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City.	Consistent. As mentioned previously, the proposed Project would provide new residential uses, including a very low-income and moderate-income affordable housing units. This Project would expand the amount of affordable housing units in the City. As such, this Project would be consistent with this policy.

6.12 MINERAL RESOURCES

Wo	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				\boxtimes
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?				\boxtimes

a. Would the project result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?

No Impact. The Project site has been developed with an existing structure and the Project would involve limited excavation. The Project site has not been utilized for mineral extraction. The Project site is not within an oil drilling district, state-designated oil field, or surface mining district.⁶⁸ There are no known oil wells at or near the Project site, nor is the site located within a Mineral Resource Zone 2 (MRZ-2) Area.⁶⁹ As such, no impacts would occur.

Mitigation Measures

Project Mitigation

No project-specific mitigation measures are necessary.

b. Would the project 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. As noted above, the Project site is not located within a Mineral Resource Zone 2 (MRZ-2) Area. The Project site is not delineated as a locally important mineral resource recovery site on a local general plan, specific plan, or other land use plan. No impacts would occur.

⁶⁸ City of Los Angeles General Plan, "Conservation Element" (2001), Mineral Resources Exhibit A, January 2001.

⁶⁹ City of Los Angeles, Department of City Planning, *Environmental and Public Facilities Map*, September 1996.

Mitigation Measures

Project Mitigation

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project would have no impact on mineral resources. As such, the Project would not contribute to cumulative impacts to mineral resources.

6.13 NOISE

Wo	ould the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	
e.	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?				

a. Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels 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 with Project Mitigation. A significant impact could occur if a project would generate excess noise that would cause the ambient noise environment 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).

Existing noise levels at four locations around the Project site were measured using a Larson-Davis Model 831 sound level meter, which satisfies the American National Standard Institute (ANSI) for general environmental noise measurement instrumentation and for Type 1 accuracy.⁷⁰ The sound level meter and microphone were mounted on a tripod 5-feet above the ground and equipped with a windscreen during all measurements. The sound level meter was set to "slow" time constant mode to record noise levels using the A-weighting filter network. The measured noise levels are shown in **Table 6.13-1: Existing Ambient Daytime Noise Levels in Project Site Vicinity**.

⁷⁰ ASHA, "American National Standard on Classroom Acoustics," https://www.asha.org/public/hearing/american-nationalstandard-on-classroom-acoustics/.

Table 6.13-1 Ambient Noise Measurements

Lo	cation Number and Description	Noise Source	Leq (dBA)
1	Northeastern corner of S. Figueroa Street and W. 3rd Street intersection	Traffic	80.0
2	Southeastern corner of S. Figueroa Street and W. 4th Street intersection	Traffic	72.7
3	Southeastern side of S. Figueroa Street, mid-block in between 3rd Street and 4th Street	Traffic	70.6
4	Northeastern corner of S. Hope Street and W. 3rd Street	Traffic	65.8

Construction

A significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dB(A) or more at any off-site, noise-sensitive location or construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by 5 dB(A) or more at any nearby noise-sensitive use, would also normally result in a significant impact. Noise sensitive uses are generally considered to be residences, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks.⁷¹

Construction of the proposed Project would require the use of equipment with the potential to generate noise above ambient background noise level. Noise levels would vary based on the amount and type of equipment being used, and the location of each activity.

The nearest noise-sensitive use, and also the nearest residential zone, is at Figueroa and 3rd Streets approximately 400 feet north of the Project. As indicated above, the ambient noise measured at the intersection of Figueroa Street and 3rd Street was 80.0 dB. Sound generated by a point source typically diminishes (attenuates) at a rate of 6 dBA for each doubling of distance from the source to the receptor at acoustically hard sites, such roadways and buildings.⁷² Therefore, at the sensitive receptor 400 feet away the construction noise from the Project would have attenuated by 18 dB from the levels measured at 50 feet. As such, construction equipment noise generated at the Project site would not significantly exceed ambient noise at the nearest noise sensitive receptor. Impacts would be less than significant.

⁷¹ City of Los Angeles, L.A. CEQA Thresholds Guide (2006), p. I.1-3.

⁷² USDOT FHWA, Fundamentals and Abatement, 97.

Operation

Roadway Noise

In order for a new noise source to be audible, there would need to be a 3 dB(A) or greater CNEL noise increase. The traffic volume on any given roadway segment would need to double during peak hours in order for a 3 dB(A) increase in ambient noise to occur. Because the Project would not double the existing traffic, the Project's mobile noise impacts can be assumed to be less than significant. As described in the Transportation Impact Report, the Project would not result in doubling the existing traffic counts on any of the analyzed intersections. As such, traffic-generated noise impacts would be considered less than significant.

Parking Structure Noise

Development of the Project would introduce parking lots associated with retail-commercial uses on the Project site. Generally, noise associated with parking lots is not of sufficient volume to exceed community noise standards based on the time-weighted CNEL scale. Parking lots can be a source of annoyance due to automobile engine start-ups and acceleration, and the activation of car alarms. Parking lots can generate Leq noise levels of between 49 dBA Leq (tire squeals) to 74 dBA Leq (car alarms) at 50 feet. As this is parking is enclosed within an existing, fully-screened concrete subterranean parking structure, noise associated with parking noise sources would be eliminated or at least substantially reduced at the nearest sensitive receptors. In addition, due to the existing level of traffic noise along area roadways, noise would not likely be audible due to the additional masking of traffic noise. As such, impacts would be less than significant.

Stationary Noise

New stationary sources of noise, HVAC equipment, would be installed in the proposed buildings at the Project site. The design of this equipment would be required to comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dB. Because the noise levels generated by the HVAC equipment serving the Project would not be allowed to exceed the ambient noise level by 5 dB on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project result in the generation of excessive ground-borne vibration or ground-borne 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. Vibration intensity is typically expressed as the peak particle velocity (PPV), defined as the maximum instantaneous peak of the vibration level, and measured in inches/second (ips). The general range of groundborne vibration extends from barely perceptible (0.006 ips) to severe (2.0 ips).

Construction activities for the Project have the potential to generate ground-borne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminish 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. The construction activities associated with the Project could have an adverse impact on both sensitive structures (e.g., building damage) and populations (i.e., annoyance).

The City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 0.2 ips at residences and other buildings where people normally sleep (e.g., nearby residences).⁷³ No thresholds have been adopted or recommended for commercial and office uses. The nearest residential structures are over 100 feet away from the Project site. Vibration attenuates with distance and construction-generated vibration levels would be less than 0.1 ips at any of the nearby residences. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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 2 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 could occur if a 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

⁷³ Caltrans, *Transportation and Construction Vibration Guidance Manual*, September 2013, http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf

or in the vicinity of a project site. There are no airports within a 2-mile radius of the Project site, nor is the Project Site within an area addressed by any airport land use plan. Further, the Project site is not near a private airstrip. As such, the Project would not expose people to excessive noise levels associated with airport uses. No impact would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project and other related projects are physically separated. Noise levels attenuate with distance. As such, on site noise from the Project, whether during construction or operation, would not cumulatively combine with noise from the site of the related projects. Off-site noise associated with the Project would consist of traffic noise from Project-related traffic. While the Project combined with the related projects would cumulatively increase area traffic, together they would not contribute to a doubling of traffic volumes throughout downtown Los Angeles. As such, they would not cause a noticeable increase in ambient noise. Therefore, the Project would not make a considerable contribution to a significant cumulative effect.

6.14 POPULATION AND HOUSING

Wc	uld the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

a. Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant Impact. A significant impact could occur if the Project would locate new development such as homes, businesses, and/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.

SCAG Regional Transportation Plan Sustainable Communities Strategy. In April 2016, SCAG adopted the 2016–2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS).⁷⁴ As a designated Metropolitan Planning Organization (MPO) under federal law, SCAG is responsible for developing and adopting a long-range RTP every four years. The plan evolved out of a massive outreach undertaking involving a broad range of stakeholders across the region to update the shared vision for the region's sustainable future. The RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards set forth by the federal Clean Air Act. The RTP/SCS focuses on the interconnected components of economic, social, and transportation investments required to achieve a sustainable regional multimodal transportation system. The goals and policies of the RTP/SCS require the participation of individual municipalities and multilevel investment of stakeholders throughout the region. As discussed in **Section 3.0** of this SCEA, the Project would be consistent with the goals and strategies of SCAG's RTP/SCS. As such, it would not result in substantial indirect or induced unplanned population growth.

⁷⁴ Southern California Association of Governments (SCAG), 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016; http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

According to the Central City Community Plan, the average household size for occupied units in a high medium density-zoned residential area is 1.89 persons per unit.⁷⁵ The construction of 570 units would result in an increase of approximately 1,077 residents in the City of Los Angeles. The overall increase in housing units and population would be consistent with and well within the SCAG forecast of 316,700 additional households and approximately 550,100 people in the City of Los Angeles between 2008 and 2035. As such, the Project would not cause unexpected growth (i.e., new housing or employment generators). The Project would not accelerate development in an undeveloped area that exceeds growth projections that would result in an adverse physical change in the environment or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan.

Based on the above, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact could occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project would develop new housing on a site that is currently occupied by office and commercial towers, landscaping, and pavements. No displacement of existing housing or people would occur upon implementation of the Project. No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project would not generate unplanned growth nor would it displace existing housing. As such, the Project would not make a considerable contribution to cumulative population or housing impacts.

⁷⁵ City of Los Angeles, *Brentwood-Pacific Palisades Community Plan*, p.III-1, accessed September 2018, https://planning.lacity.org/complan/pdf/CCYCPTXT.PDF.

6.15 PUBLIC SERVICES

Wo	buld 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.	Fire protection?			\boxtimes	
b.	Police protection?			\boxtimes	
c.	Schools?			\boxtimes	
d.	Parks?			\boxtimes	
e.	Other public facilities?			\boxtimes	

Impact Analysis

a. 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:

i. Fire Protection

Less than Significant Impact. A project would normally have a significant impact on fire protection if it requires a new or expanded fire station to maintain service and that new or expanded facility resulted in adverse physical effects. 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. The maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.⁷⁶

⁷⁶ LAMC Section 57.09.07A.

The Project could potentially increase the demand for LAFD services. The Project site is served by LAFD Station No. 3, located at 108 North Fremont Avenue, approximately 0.25 miles north of the Project site.⁷⁷ Aa discuss in **Section 4.17 Transportation and Traffic**, the Project would not result in a significant change in traffic flow that could impede response times. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 3 to the Project site, fire protection response is considered adequate. As such, no new or expanded fire stations or other facilities would need to be constructed to serve the Project. Impacts would be less than significant.

The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire-flow requirements for different land uses and a minimum residual water pressure that must remain in the water system when during the required fire flow. LADWP has prepared a fire service pressure flow report that indicates that there is sufficient pressure to provide fire flow and residual pressure.⁷⁸ Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

ii. Police Protection

Less than Significant Impact. For the purpose of this Initial Study, a significant impact could occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project without necessitating a new or physically altered station, the construction of which may cause significant environmental impacts. The determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area; (b) the demand for police services anticipated at the time of completion and occupancy of the Project compared to the expected level of service available, considering, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

⁷⁷ Los Angeles Fire Department, Station 3, accessed September 2018, https://www.lafd.org/fire-stations/station-3.

⁷⁸ See Appendix H.

A letter was sent to the LAPD to determine if the Project would result in any significant impacts to LAPD services and facilities. The following information was provided in the response letter received on December 13, 2018.

The Project site is located in the Central Community of the LAPD's Central Bureau.⁷⁹ The Central Community Police Station is located at 251 East 6th Street, approximately 1.2 miles and 6 minutes without traffic from the Project site. The Central Geographic Area is approximately 4.5 square miles and consists of 52 Reporting Districts. The service boundaries for the Central Area is as follows: Stadium Way, Pasadena Freeway to the North, Washington Boulevard, 7th Street to the South, Los Angeles River to the East, and the Harbor Freeway to the West. The officer to resident ratio is; 1 officer to 108 residents in the Central Area. Additionally, there are special service teams available within the LAPD to service the Central Area.

The Central Station's emergency response system is directly linked to the Los Angeles Police Department Communications Division's Dispatch Centers. Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, and paramedic). Communication Division handles only policy related calls for the City.

The average response time to emergency calls for service in Central Area during 2018 was 2.8 minutes. The average response time for nonemergency calls for service in the Central Area during 2018 was 19.6 minutes.⁸⁰

Implementation of the Project would result in an increase of residents and visitors on the Project site, thereby generating a potential increase in the number of service calls to the site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to minimally increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. This increase in service demand may require additional officers. However, the Central Community Police Station would not need to be expanded or relocated to accommodate the additional demand from the Project. Furthermore, any future new stations or other facilities would be subject to CEQA review. As such, no substantial adverse physical impacts would be associated with new or physically altered police facilities as a result of the Project. Impacts would be less than significant.

⁷⁹ Los Angeles Police Department, *Central Community Police Station*, accessed September 2018, http://www.lapdonline.org/central_community_police_station.

⁸⁰ Correspondence from Michel Moore, Chief of Police, Los Angeles Police Department, December 2018.

Mitigation Measures

No project-specific mitigation measures are necessary.

iii. Schools

Less than Significant Impact. A significant impact could occur if a project includes substantial employment or population growth that could generate a demand for school facilities which would exceed the capacity of the Los Angeles Unified School District (LAUSD). The determination of whether the project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area; (b) the demand for school services anticipated at the time of project completion and occupancy compared to the expected level of service available, considering, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand; (c) whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions that would create a temporary or permanent impact on the school(s); and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project area is currently served by several LAUSD public schools, as shown in **Table 6.15-1: LAUSD Public Schools within the Project Area.** As shown in **Table 6.15-2: Project Estimated Student Generation**, the Project could generate approximately 94 elementary students, 26 middle school students, and 54 high school students, for a total of approximately 174 K-12 students, an incremental increase in student population. In addition, the Applicant would be required to pay applicable school fees in accordance with California Government Code Section 65995, which are deemed by statute to fully mitigate any potentially significant impact on schools. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

School	Address	Distance from Project Site (miles)	Students Served
Para Los Ninos – Evelyn Thurman Gratts Primary Center	474 S Hartford Ave, Los Angeles, CA 90017	0.7	K-1
Castelar Street Elementary School	840 Yale St, Los Angeles, CA 90012	1.3	K-5
Gratts Learning Academy for Young Scholars (GLAYS)	309 Lucas Ave, Los Angeles, CA 90017	0.6	2-6
John H Liechty Middle School	650 S Union Ave, Los Angeles, CA 90017	1.0	6-8
Miguel Contreras Learning Complex	322 Lucas Ave, Los Angeles, CA 90017	0.5	9-12
Ramon C Cortines School of Visual & Performing Arts	450 N Grand Ave, Los Angeles, CA 90012	0.9	9-12
Belmont Senior High School	1575 W 2nd St, Los Angeles, CA 90026	0.9	9-12
Edward R Roybal Learning Center	1200 W Colton St, Los Angeles, CA 90026	1.0	9-12

Table 6.15-1LAUSD Public Schools within the Project Area

Source: Los Angeles Unified School District, Resident School Identifier (2018); Correspondence from Rena Perez, Director, Los Angeles Unified School District Facilities Services Division, December 2018.

Table 6.15-2 Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total
Multifamily residences ^a	570 du	94	26	54	174

Source: Los Angeles Unified School District, School Facilities Needs Analysis (September 2012).

a Student generation rates are as follows for residential uses: 0.1649 elementary, 0.0450 middle, and 0.0943 high school students per unit. Note: du = dwelling unit.

iv. Parks

Less than Significant Impact. The determination of whether a 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 project; (b) the demand for recreation and park services anticipated at the time of

completion and occupancy of a project 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 *Public Recreation Plan*, 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.⁸¹ The standard ratio of neighborhood and community parks to population is 4 acres per 1,000 residents within a 1- to 2-mile radius for neighborhood and community parks. The Project site is located within a highly urbanized area of the Central City community. There are approximately 75 parks and 51 recreation centers within a 5-mile radius of the Project.⁸²

It is estimated that development of the Project would result in an increase of 1,077 new residents, and that these residents would increase the activity and frequency of use of these facilities.

The Project includes on-site open space amenities intended to serve the recreational needs of on-site residents, including approximately 61,300 square feet of common indoor and outdoor open space, which includes space for landscaping and approximately 1,900 square feet dedicated for private balconies. The ground floor would include indoor and outdoor seating areas, green spaces, and a residential lobby. The Level 6 podium deck would include a residential lobby and lounge; indoor gym and yoga studio; outdoor pool and spa; seating, lounge, dining, and barbeque areas; grass area and assorted green spaces; fire pit with additional seating; bocce ball court; and a new basketball court, in addition to an existing tennis court to remain. The Level 41 rooftop deck would include a synthetic grass area and green spaces; seating, lounge, dining, and barbeque areas; outdoor projector screen; and private residential garden.

Notwithstanding the availability of on-site recreational amenities, it is assumed that the future residents of the Project site would utilize recreation and park facilities in the surrounding area and generate additional demand for such amenities. Based on the standard parkland ratio goal of 4 acres per 1,000 residents, the Project would generate a need for approximately 4.31 acres of public parkland. This demand would be met through a combination of (1) on-site open space proposed within the Project discussed above, and (2) payment of applicable fees regarding the availability of existing park and recreation facilities within the area. In accordance with City Ordinance 184,505, the Project Applicant would be required to pay a fee for the purpose of developing park and recreational facilities to offset the Project's demand for

⁸¹ City of Los Angeles General Plan, "Service Systems Element."

⁸² City of Los Angeles Department of Recreation and Parks, *Facility Map Locator*, https://www.laparks.org/maplocator, accessed September 2018

parks and recreational facilities.⁸³ Through compliance with the LAMC, Project impacts related to parks and recreational facilities would be offset to a level of less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

v. Other Public Facilities

Libraries

Less than Significant Impact. A significant impact could occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries) that would exceed the capacity available to serve the Project site. The LAPL provides library services at the Central Library, eight regional branch libraries, 64 community branches and bookmobile units, with approximately 6.9 million books and other materials that compose the LAPL collection.⁸⁴ Library facilities within two miles of a Project site are generally considered to be within the service area of a Project.⁸⁵ The closest LAPL currently serving the Project site is the Central Library, located at 630 West 5th Street, approximately 830 feet southeast of the Project site. The Project site is also located within the service area of six other LALP Branch Libraries. The Little Tokyo Branch Library is located 0.68 miles from the Project site, the Chinatown Branch Library is located 0.92 miles from the Project site, the Echo Park Branch Library 0.93 miles from the Project site, the Pico Union Branch Library 1.46 miles from the Project site, the Edendale Branch Library 1.74 miles from the Project site and the Felipe de Neve Branch Library 1.8 miles from the Project site. The Project would introduce new residents to the site, however the population growth associated with the Project is within the growth projections for downtown Los Angeles. Impacts of the Project on library services would further be reduced as it is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. Furthermore, the Project would be required to pay development impact fees. Therefore, given the existing library facilities with the surrounding area, and seeing as the Project site is within the service area of seven LAPL Branch Libraries, no new branches or facilities are projected to be needed to serve the surrounding community with the Project. Impacts would be less than significant.

⁸³ City of Los Angeles Municipal Code, Section 21.10.3(a)(1), and (3)

⁸⁴ Los Angeles Public Library, Library Statistics, https://www.lapl.org/about-lapl/press/2013-library-facts. Accessed September 2018.

⁸⁵ City of Los Angeles CEQA Thresholds Guide, Section K.5, page K.5-2 (2006).

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The proposed project's implementation will result in an incremental increase in the demand for police and fire service calls. The developer will be required to pay all pertinent development fees and to ensure that the site plans and project are consistent with the most recent fire codes and safety measures outlined by the Los Angeles Fire Department (LAFD) and the Los Angeles Police Department (LAPD). No new facilities would be required to accommodate the proposed use. As a result, no cumulative impacts are anticipated.

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?				\boxtimes
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 facility would occur or be accelerated?

Less than Significant Impact. A significant impact could occur if a project includes 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 Project; (b) the demand for recreation and park services anticipated at the time of Project build-out 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 Project includes on-site open space amenities intended to serve the recreational needs of the residents, including approximately 61,300 square feet of common indoor and outdoor open space, which includes space for landscaping and approximately 1,900 square feet of private balcony space. Notwithstanding the availability of on-site recreational amenities, it may be assumed that the future occupants of the Project would utilize recreation and park facilities in the surrounding area. However, the Project would include a range of on-site recreational amenities that would offset demand on surrounding public parks. Further, the Applicant is required by law to pay applicable fees regarding the availability of

existing park and recreation facilities within the area.⁸⁶ Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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 could occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The proposed Project would include recreational facilities, including a pool and space, basketball courts, and other outdoor amenities discussed previously. However, these recreational facilities would be integrated into the building, and thus do not represent separate potential impacts.

As previously mentioned, based on the standard parkland ratio goal of 4 acres per 1,000 residents, the Project would generate a need for approximately 4.31 acres of public parkland. This demand would be met through a combination of (1) on-site open space proposed within the Project discussed above, and (2) payment of applicable fees regarding the availability of existing park and recreation facilities within the area. In accordance with City Ordinance 184,505, the Project Applicant would be required to pay a fee for the purpose of developing park and recreational facilities to offset the Project's demand for parks and recreational facilities.⁸⁷ Although the Project would place some additional demand on park facilities, the increase in demand would be met through a combination of on-site open space amenities and existing parks in the Project area. As such, the Project's increased demands upon recreational facilities would not by itself necessitate the construction of new recreation or park facilities, which might have an adverse physical effect on the environment. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The analysis determined the proposed project would not result in any potential impact on recreational facilities and services. As a result, no cumulative impacts on recreational facilities would result from the proposed project's implementation.

⁸⁶ City of Los Angeles Municipal Code, Section 21.10.3(a)(1), and (3).

⁸⁷ City of Los Angeles Municipal Code, Section 21.10.3(a)(1), and (3).

6.17 TRANSPORTATION AND TRAFFIC

Wo	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				
b.	Would the project 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)?				
d.	Result in inadequate emergency access?				

a. Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less than Significant Impact. The following section summarizes and incorporates by reference information from the Transportation Study for the proposed 350 South Figueroa Project, dated July 2019, prepared by The Mobility Group, and included as **Appendix F** of this SCEA. The analysis therein was prepared in accordance with the assumptions, methodology, and procedures approved by the City of Los Angeles Department of Transportation (LADOT). The LADOT signed the Transportation Impact Study Memorandum of Understanding (MOU), included in **Appendix F**, which acknowledges that the Transportation Study was prepared in accordance with the latest version of LADOT's Transportation Impact Study Guidelines.

A significant impact could occur if the Project were to result in substantial increases in traffic volumes in the vicinity of the Project such that the existing street capacity experiences a decrease in the existing volume-to-capacity (V/C) ratios or experiences increased traffic congestion exceeding LADOT's recommended level of service.

Trip generation estimates for the Project were calculated based on the latest edition of the Institute of Transportation Engineers' *Trip Generation* manual.⁸⁸ The Project is expected to generate a total of 965 net trips per day, including 105 morning peak-hour trips and 95 evening peak-hour trips. The report analyzed existing (2018) and future (2023, approximate end of construction) AM and PM peak-hour traffic

⁸⁸ See Appendix F of this SCEA.

conditions at 13 critical intersections in the vicinity of the Project site. These locations, discussed with and agreed up by the LADOT, include key intersections along the primary access routes to and from the site, and are those locations expected to be most directly impacted by Project traffic.

The methodology used for analyzing intersections was based on the "Critical Movement Analysis (Planning Method)" as described in "Transportation Research Circular 212, Transportation Research Board, Washington D.C. 1980," and as required by LADOT's Traffic Study Policy and Procedures, to obtain volume/capacity (V/C) ratios for each intersection. LADOT has established criteria to determine if project impacts are significant at an intersection. According to these criteria, a project would have a significant after the addition of project traffic at an intersection if it is operating at LOS C and the incremental change in V/C ratio is equal to or greater than 0.040, if it is operating at LOS D and the incremental change in V/C ratio is equal to or greater than 0.020, or if is operating at LOS E or F and the incremental change in V/C ratio is equal to or greater than 0.010. As shown in **Table 6.17-1: Existing Traffic Conditions Without and With Project—Intersection Level of Service, AM/PM Peak Hours** and **Table 6.17-2: Future Traffic Conditions Without and with Project—Intersections** evaluated. Construction related trips would be less than the number of trips identified to be generated by the Project and therefore construction traffic would also have a less than significant impact on level of service.

As described in the Traffic Study, the number of transit trips that would be generated by the Project was estimated to be 28 net additional transit trips in the AM peak hour and 25 additional trips in the PM peak hour. Based on capacity of the existing transit system serving the Project site, the Project would represent approximately 0.15% of the transit capacity during the peak hour. As such, the Project would not cause the capacity of the transit system to be substantially exceeded.

The project will improve the pedestrian experience by increasing sidewalk widths in compliance with the dimensions proposed in the Downtown Street Standards guide and the Bunker Hill Specific Plan. In addition, construction of the Project would implement the following Project Design Feature:

PDF-TRAF1: A Construction Traffic Management Plan will be prepared for approval by the City prior to the start of construction, to incorporate the measures identified above, as well as a Worksite Traffic Control Plan to facilitate pedestrian bicycle and vehicular traffic movement, in order to minimize any potential impacts, and specifying the details of any sidewalk or lane closures. The Worksite Traffic Control Plan will be developed by the Applicant, and will identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. The Applicant will notify and consult with the two schools on the plan. The Worksite Traffic Control Plan would minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The plan will be reviewed and approved by LADOT prior to commencement of construction

Based on the above, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact. CEQA Guidelines Section 15064.3(b) states that "vehicle miles traveled is the most appropriate measure of transportation impacts" and that "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." The Project is within one-half mile of an existing major transit stop. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.
Table 6.17-1 Existing Traffic Conditions Without and With Project—Intersection Level of Service, AM/PM Peak Hours

			Exist	ing	Existing Plus Project			
No	Intersection	Peak Hour	V/C	LOS	V/C	LOS	Change in V/CSig	nificant Impact
1	Figueroa Street &	AM	0.639	В	0.640	В	0.001	NO
1.	2nd Street	PM	0.692	В	0.694	В	0.002	NO
2	Figueroa Street &	AM	0.704	С	0.709	С	0.005	NO
Ζ.	3rd Street	PM	0.673	В	0.674	В	0.001	NO
3.	Figueroa Street &	AM	0.203	А	0.203	А	0.000	NO
	4th Street	PM	0.231	А	0.234	А	0.003	NO
4	Figueroa Street &	AM	0.319	А	0.320	А	0.001	NO
4.	5th Street	PM	0.476	А	0.480	А	0.004	NO
-	Figueroa Street &	AM	0.295	А	0.295	А	0.000	NO
5.	6th Street	PM	0.366	А	0.369	А	0.003	NO
<u> </u>	Hope Street & 1st	AM	0.555	А	0.556	А	0.001	NO
6.	Street	PM	0.659	В	0.665	В	0.006	NO
_	Flower Street &	AM	0.649	В	0.652	В	0.003	NO
7.	3rd Street	PM	0.435	А	0.435	А	0.000	NO
	Flower Street &	AM	0.498	А	0.508	А	0.010	NO
8.	4th Street	PM	0.548	А	0.551	А	0.003	NO
•	Flower Street &	AM	0.245	А	0.257	А	0.012	NO
9.	5th Street	PM	0.439	А	0.442	А	0.003	NO
10	Flower Street &	AM	0.235	А	0.237	А	0.002	NO
10.	6th Street	PM	0.283	А	0.283	А	0.000	NO
11	Grand Avenue &	AM	0.318	А	0.318	А	0.000	NO
11.	5th Street	PM	0.427	А	0.427	А	0.000	NO
	Olive Street & 5th Street	AM	0.363	А	0.363	A	0.000	NO
12.		PM	0.661	В	0.661	В	0.000	NO
	Hill Street & 3rd Street	AM	0.671	В	0.673	В	0.002	NO
13.		PM	0.592	А	0.598	А	0.006	NO

Table 6.17-2

Future Traffic Conditions Without and with Project—Intersection Level of Service, AM/PM Peak Hours

			Future withou	t Project		F	uture Plus Pro	ject
No	Intersection	Peak Hour	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact
	Figueroa Street &	AM	0.756	С	0.765	С	0.009	NO
1.	2nd Street	PM	0.985	E	0.987	Е	0.002	NO
n	Figueroa Street &	AM	0.882	D	0.887	D	0.005	NO
Ζ.	3rd Street	PM	0.862	D	0.863	D	0.001	NO
3.	Figueroa Street &	AM	0.257	А	0.258	А	0.001	NO
	4th Street	PM	0.345	А	0.350	А	0.005	NO
Л	Figueroa Street &	AM	0.480	А	0.481	А	0.001	NO
4.	5th Street	PM	0.689	В	0.693	В	0.004	NO
5	Figueroa Street &	AM	0.469	А	0.469	А	0.000	NO
J.	6th Street	PM	0.607	В	0.609	В	0.002	NO
6	Hope Street &	AM	0.747	С	0.749	С	0.002	NO
0.	1st Street	PM	0.882	D	0.887	D	0.005	NO
7	Flower Street &	AM	0.786	С	0.790	С	0.004	NO
	3rd Street	PM	0.687	В	0.688	В	0.001	NO
8	Flower Street &	AM	0.618	В	0.629	В	0.011	NO
	4th Street	PM	0.706	С	0.708	С	0.002	NO
Q	Flower Street &	AM	0.372	А	0.376	А	0.004	NO
5.	5th Street	PM	0.583	А	0.585	А	0.002	NO
10	Flower Street &	AM	0.415	А	0.418	А	0.003	NO
10.	6th Street	PM	0.542	А	0.543	А	0.001	NO
11	Grand Avenue &	AM	0.477	А	0.477	В	0.000	NO
11.	5th Street	PM	0.657	В	0.657	В	0.000	NO
12.	Olive Street & 6th Street	AM	0.632	В	0.632	В	0.000	NO
		PM	1.000	E	1.000	Е	0.000	NO
13.	Hill Street & 3rd Street	AM	0.986	Е	0.987	E	0.001	NO
		PM	1.006	F	1.011	F	0.005	NO

c. Would the project 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 could occur if a 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. Some existing driveways would be modified to enable access and egress for the proposed uses. The Project would not include any change in intersection or roadway design. The Project would not include unusual or hazardous design features. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

d. Would the project result in inadequate emergency access?

Less than Significant Impact. A significant impact could 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. Development of the Project site may require temporary and/or partial street and sidewalk closures due to construction activities. Any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. Such closures would not be expected to interfere with emergency response or evacuation plans. As described previously, the Project would satisfy the emergency response requirements of the LAFD. No hazardous design features are included in the access design or site plan for the Project that could impede emergency access. As stated above, under threshold 'a', the Project includes a project design feature to implement a Construction Traffic Management Plan and Worksite Traffic Control Plan. Furthermore, the Project would be subject to the site plan review requirements of both the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. The Project would not be expected to result in inadequate emergency access. Impacts would less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Traffic Study looked at cumulative traffic conditions and determined the Project would not have a considerable contribution to cumulative impacts. As a result, cumulative impacts would be less than significant.

6.18 TRIBAL CULTURAL RESOURCES

Wo	uld 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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. 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 the 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), or

Less than Significant Impact. The Project site is currently developed with office uses and a subterranean parking lot. As described in Section 4.5: Cultural Resources, there are no known historic resources, including tribal resources, on the Project site that are listed or eligible for listing in the California Register of Historical Resources or the City of Los Angeles Historic-Cultural Monument List. Ground disturbances for the Project will occur during the proposed demolition, site preparation, and grading phases, estimated to require up to 30 feet of excavation below the surrounding street elevation. The potential for unidentified tribal cultural resources within the Project site is found to be low. The Project is subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources, which

requires construction be halted and California Native American tribes be consulted on treatment. Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA. However, based on the condition of approval, any potential impacts would be reduced to less than significant. Further, the Project would not adversely affect any nearby resources that are listed or eligible for listing. Therefore, potential impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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.

Less than Significant Impact. Public Resources Code, Section 21080.3.1, establishes a formal process for Lead Agencies to consult with California Native American tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Section 20174 of the Public Resources Code. In compliance with the Code, the City sent notices to Native American tribes that are known to be traditionally and culturally affiliated with the Project area and have requested to be notified of projects.

The City received a response from the Gabrieleño Band of Mission Indians-Kizh Nation ("the Tribe") and consultation was initiated with representatives from the Tribe. No other responses were received. In addition, a records search was conducted at the California Historical Resources Information System (CHRIS).⁸⁹ The CHRIS search identified no previously recorded tribal cultural resources within a 1/2-mile radius of the Project site. Furthermore, excavation for the existing parking levels would likely have disturbed subsurface cultural resources that may have been present. As a result, the potential for unidentified tribal cultural resources within the project site is considered to be low.

The project would be subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources, which requires construction be halted and California Native American tribes be consulted on treatment. Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA. However, based on the condition of approval, any potential impacts

⁸⁹ *Tribal Cultural Resources Assessment*, 350 South Figueroa, World Trade Center, City of Los Angeles, California, SWCA Environmental Consultants, March 2019 included as **Appendix G** to this SCEA.

would be reduced to less than significant. Therefore, the project would have less-than significant impacts to tribal cultural resources.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

Impacts related to Tribal Cultural resources tend to be site-specific and are assessed on a site by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws and the City's Conditions of Approval, Project impacts associated with Tribal Cultural resources would be less than significant. However, the occurrence of these impacts would be limited to the Project site and would not contribute to any potentially significant Tribal Cultural resources impacts that could occur at the sites of the related projects. As such, the proposed Project would not make a considerable contribution to potential cultural resources.

6.19 UTILITIES AND SERVICE SYSTEMS

Wc	uld the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
а.	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?			\boxtimes	
b.	Have sufficient water supplies available to serve the project and reasonable 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?			\boxtimes	
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?			\boxtimes	

a. Would the project 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.

Water

Water service for the Project would be provided by the Los Angeles Department of Water and Power (LADWP). LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,000 miles of pipes, more than 100 storage tanks and reservoirs within the City, and 8 storage reservoirs along the Los Angeles Aqueducts. The Project is located in downtown Los Angeles that is served by an existing system of water lines. In accordance with the Department of City Planning requested that LADWP prepare a Water Supply Assessment (WSA). The Los Angeles Board of

Water and Power Commissioners adopted the WSA for the Project at their November 19, 2019, meeting. The WSA and associated resolution are included with this SCEA as **Appendix H**. As part of the WSA process, the Applicant committed to implement water conservation measures above those required by code, specifically:

- High Efficiency Toilets with a flush volume of 1.06 gallons per flush, or less.
- Showerheads with a flow rate of 1.75 gallons per minute, or less, for residential units only.
- ENERGY STAR Certified Residential Dishwashers standard with 2.9 gallons/cycle or less
- Drip/Subsurface Irrigation (Micro-irrigation)
- Proper Hydro-zoning/Zoned Irrigation-(groups plants with similar water requirements together)
- Artificial Turf
- Drought Tolerant Plants approximately 75 percent of total landscaping

The Applicant shall also comply with the City of Los Angeles Low Impact Development Ordinances (City Ordinance No. 181899 and No.183833) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the entire Project as feasible, pending final determination. Projected total net water demand increase for the Figueroa Project is estimated to be109 AF annually. This amount takes into account savings due to water conservation ordinances which are approximately 35 AFY, and savings due to additional voluntary conservation measures which are approximately 2 AFY.

As this is consistent with the demographic forecasts for the City, LADWP has determined that the additional water demand associated with the Project has been accounted for in LADWP's demand projections. LADWP has forecast adequate water supplies to meet all projected water demands in the City through the year 2040. LADWP therefore concluded it will be able to meet the proposed water demand of the Project.

Wastewater

The Los Angeles Bureau of Sanitation provides sewer service to the proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the HTP. The HTP treats an average daily flow of 362 million gallons per day (mgd), and has the capacity to treat 450 mgd.⁹⁰ This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP. The Bureau of Sanitation, as part of a wastewater services information letter, has provided a wastewater estimate that the Project would generate 71,213 gpd of wastewater.⁹¹ Given the available capacity of the HTP, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Furthermore, the Project Applicant shall be required to implement applicable LA Green Building

91 See Appendix H.

⁹⁰ City of Los Angeles Department of Public Works, Bureau of Sanitation, "Wastewater System Fact Sheet" (2014).

Code requirements that would further reduce wastewater flow.

Stormwater

The Project Site is located in a developed portion of Los Angeles that is currently served by stormwater infrastructure. Prior to issuance of a construction permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit and a Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Proposed Project in compliance with the requirements of the NPDES Permit. The SWPPP would identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. In addition, the Project would be required to demonstrate compliance with the Los Angeles Low Impact Development (LID) Ordinance standards. The primary purpose of the LID ordinance is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. As such, the volume of stormwater runoff during peak events would not increase and the construction of new stormwater drainage facilities or expansion of existing facilities would not be required.

Electric power, Natural gas, and Telecommunications

The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing electric power, natural gas, and telecommunications services. In the context of the greater Los Angeles service area and the growth forecasts used by utility service providers, the Project would not be a substantial source of new unplanned demand for electrical, gas or telecommunications services. New connections would be established for the Project which would be coordinated with the appropriate service provider and any trenching or other excavation within the public right of way would also be coordinated with the City Department of Public Works. The portion of the existing structure to be demolished does not contain electrical, gas, or telecommunications generation or transmission infrastructure that would need to be relocated off-site. As such, the Project would not require relocation of electrical, gas, or telecommunications facilities, the relocation of which could cause significant environmental effects.

Based on the above, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Have sufficient water supplies available to serve the project and reasonable 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. As discussed above, under threshold a, the LADWP has determined that it would be able to meet the proposed water demand of the Project as well as existing and planned future water demands of its service area during normal, dry, and multiple dry years.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. Would the project 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. As stated above, the Hyperion Treatment Plant will have capacity to serve the Project. The Project would require new connections to the wastewater conveyance system, and as stated above, would increase the wastewater flow generated at the Project site. If the project exceeds the capacity of the wastewater conveyance system, the Project Applicant would have to fund the off-site improvements necessary to increase capacity to meet the Project's demand. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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 could 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), or the Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multifamily developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, and transformed at a waste-to-energy facility, or disposed of at a landfill.

It is currently unknown which landfill location will be used to deposit waste generated from the Project site. However, the County of Los Angeles Department of Public Works prepares an annual report on solid waste management in the County in order to help meet long-term needs and maintain adequate capacity. As stated in the County's most recent report, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion. ⁹² The report utilized a UCLA Long Term Forecast of population and employment projections over the planning horizon of its annual waste management report, which currently extends to 2031 and predicts the County will grow from 10.3 million people in 2016 to 11.2 million in 2031, a slightly faster growth trend than SCAG's 2016–2040 RTP/SCS forecasts that predicts the County will reach 11.5

⁹² County of Los Angeles, Department of Public Works, 2017 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, April 2019, page 7.

million by 2040. As of December 2017, the total available capacity of the ten permitted landfills within Los Angeles County was 167.6 million tons, with a reported 2017 annual disposal of 10.5 million tons.⁹³

Construction of the Project would comply with the City's Citywide Construction and Demolition (C&D) Waste Recycling Ordinance.⁹⁴ As such, construction waste would be removed from the Project site by a City-permitted solid waste hauler and taken to a City-certified C&D processing facility.

As shown in **Table 6.19-3: Project Solid Waste Generation**, the Project would generate an estimated increase of approximately 2,103 pounds per day of solid waste. This estimate is conservative because it does not factor in any recycling or waste diversion programs. The permitted County landfills have adequate capacity to accommodate the increase in solid waste generated from the Project. Therefore, solid waste impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Project Solid Waste Generation						
Type of Use	Size	Waste Generation Rate (lb./unit/day)	Total Solid Waste Generated (lb./day)			
Multifamily Residential	570 du	4 lb./du/day ^b	2,280			
Existing Office	29,500 sq. ft.	0.006 lb./sq. ft./day	177			
Net Solid Waste Generation			2,103			

Table 6.19-3 Project Solid Waste Generation

Note: sq. ft. =square feet; du = dwelling units; lb. = pounds.

a CalRecycle, "Public Sector and Institutions: Estimated Solid Waste Generation Rates." (July 2018).

b CalRecycle, "Residential Developments: Estimated Solid Waste Generation Rates." (July 2018).

е.

Would the project comply with federal, State, and local statutes and regulations related to solid waste?

Less than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste that is typical of retail and mixed-use residential buildings and would comply with all federal, State, and local statutes and regulations regarding proper disposal. Impacts would be less than significant.

⁹³ County of Los Angeles, Department of Public Works, 2017 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, April 2019, Table E-1.

⁹⁴ California Waste Services, https://www.californiawasteservices.com/los-angeles.html. Accessed July 2019.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

Utility service providers manage generation, treatment and disposal facilities based on forecasts of regional growth, which accounts for cumulative foreseen development. As the Project is consistent with these forecasts, it would not make a considerable contribution to cumulative impacts on utilities systems.

6.20 WILDFIRE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
lf l cla pre	ocated in or near state responsibility areas or lands assified as very high fire hazard zones, would the oject:				
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?				
b.	Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations form a wildfire or the uncontrolled spread of a wildfire?				\boxtimes
с.	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?				\boxtimes
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?				\boxtimes

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project is not located in or near state responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. As such, no impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Due to the 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?

No Impact. The Project is not located in or near state responsibility areas or lands classified as very high fire hazard zones.⁹⁵ The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. As such, no impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

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 on going impacts to the environment?

No Impact. The Project is not located in or near state responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards.⁹⁶ As such, no impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

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?

No Impact. The Project is not located in or near state responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. In addition, as previously discussed, the Project Site is not susceptible to potential flooding or landslide, nor would the Project result in potential drainage changes. As such, no impacts would occur.

⁹⁵ City of Los Angeles, ZIMAS, "Parcel Profile Report," accessed July 2019, zimas.lacity.org.

⁹⁶ City of Los Angeles DCP, General Plan, "Safety Element" (1996), Exhibit D: Selected Wildfire Hazard Areas in the City of Los Angeles.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project is not located in or near state responsibility areas or lands classified as very high fire hazard zones. As such, the Project would not contribute to cumulative wildfire impacts.

6.21 MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
а.	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?			\boxtimes	

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant. The Project is located in a densely populated urban area and would have no significant impacts after mitigation with respect to biological resources and less than significant impacts to cultural resources. The Project would not 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 prehistory. Therefore, impacts would be less than significant with project mitigation.

Mitigation Measures

No mitigation measures are necessary.

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 could occur if the Project, in conjunction with related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. In accordance with CEQA, the analysis of cumulative impacts need not be as in-depth as what is performed relative to the project, but instead is to "be guided by the standards of practicality and reasonableness." Cumulative impacts are addressed within each topical area above. As shown throughout this Initial Study, the Project would not have a cumulatively considerable impact. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are necessary.

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

Less than Significant with Project Mitigation. A significant impact could occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures noted. Impacts would be less than significant with project mitigation.

Mitigation Measures

Applicable mitigation measures noted previously in this Initial Study would be incorporated into the Project.