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Everest Value School Project

Case Number: ENV-2019-6160-ND

Project Location: 233-245 North Westmoreland Avenue, 3611-3627 West Cosmopolitan Street, and 232-240 North Madison Avenue, Los Angeles, California, 90004

Community Plan Area: Wilshire

Council District: 13—O'Farrell

Project Description: The proposed project includes the demolition of an existing single-story commercial/warehouse building located at the southeastern portion of the Project Site and the construction, use, and maintenance of a two-story, 32-foot in height, charter school within Subarea D (Light Industrial/Commercial) of the Vermont/Western Station Neighborhood Area (SNAP) Specific Plan. The proposed project includes a 24,360 square foot building for use as a public transitional kindergarten (TK) to 8th grade charter school (Proposed School), consisting of 20 classrooms, administrative offices, and outdoor recreational areas, which include playgrounds, lunch areas, planting gardens, basketball courts, and a soccer field. The proposed maximum number of students enrolled would be 480 students. The site is located on a 53,353 square-foot lot that would include 24,360 square feet of total floor area with a Floor Area Ratio (FAR) of 0.46:1.

The proposed Project includes an on-site pickup/drop-off area which will be accessed by a driveway providing inbound and outbound access for vehicles from Cosmopolitan Street. A secondary driveway is proposed to provide outbound traffic on Madison Avenue. The Project would provide 28 parking spaces within a surface parking lot located on-site along the southern portion of the site.

The Proposed School would regularly be operational Monday through Friday from 8:00 AM to 2:45 PM. Special events would include, but not limited to, before school program, musical performances and athletic practice/games which may occur between the hours of 6:00 AM to 9:00 PM Monday through Friday. Additionally, occasional on-site activities may occur on Saturdays which would take place from 8:00 AM to 5:00 PM and Sundays from 12:00 PM to 5:00 PM. The Project is anticipated to be completed and occupied by Fall 2021.

July 2020

The Project Site is located within the Bureau of Engineering's (BOE) Special Grading Area. Construction of the Project would require haul trips to and from the site to export 1,506 cubic yards of soil to 15990 E. Foothill Boulevard, Irwindale. Trucks traveling to and from the Project site would be required to travel along the haul route approved by the City. A maximum of 80 haul truck trips per day would take place during grading between a two (2) day period. Haul truck traffic would take the most direct route to the appropriate freeway ramp via Westmoreland Avenue, Temple Street and Silver Lake Boulevard to the US 101, I-10 and I-605 Freeway.

The applicant is requesting the following approvals from the City: (1) a Conditional Use permit to allow the construction, use and maintenance of a new TK-8th grade public charter school and its accessory uses on an M1-1 zoned Project Site (CM Zoned per Subarea D of the SNAP); (2) a Project Permit Compliance Review for the demolition of an existing single-story commercial/warehouse building and the construction, use, and maintenance of a new 24,360 square-foot school; (3) a Specific Plan Exception to allow less than 75 percent of the ground floor exterior wall along the building frontage to be located more than ten feet from any lot line parallel to a public street; (4) a Specific Plan Exception to allow the surface parking lot to not be placed in the rear of the building and located within 20 feet of a public street; and (5) a Waiver of Street Dedication and/or Improvements for the five-foot dedication requirement to the northern side of Cosmopolitan Street which adjoins the project site's street frontage. The applicant would also request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities which may include, but are not limited to, the following: excavation, shoring, grading, foundation, haul route, and removal and replacement of street trees for the project site.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Meridian Consultants

APPLICANT:

VSF School Facilities #2 LLC

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1 INTRODUCTION

An application for the proposed Everest Value School Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study (IS) is required.

This IS evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This IS has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this IS, the City has concluded that the Project will not result in significant impacts on the environment. This IS and Negative Declaration (ND) are intended as informational documents and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An IS a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the IS shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the IS identifies potentially significant effects but revisions have been made by or agreed to by the Applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the IS concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.¹

¹ State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 ORGANIZATION OF THE INITIAL STUDY

This IS organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the IS and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the Project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed IS Checklist and discussion of the environmental factors that would be potentially affected by the Project.

2 EXECUTIVE SUMMARY

| | |
|------------------------|-------------------------------------|
| PROJECT TITLE | Everest Value School Project |
| ENVIRONMENTAL CASE NO. | ENV-2019-6160-ND |
| RELATED CASES | CPC-2019-6159-CU-SPE-SPP-WDI |

| | |
|--------------------------|--|
| PROJECT LOCATION | 233-245 N. Westmoreland Avenue, 3611-3627 W. Cosmopolitan Street, and 232-240 N. Madison Avenue, Los Angeles, California, 90004 |
| COMMUNITY PLAN AREA | Wilshire |
| GENERAL PLAN DESIGNATION | Limited Industrial |
| ZONING | M1-1 |
| COUNCIL DISTRICT | 13—O'Farrell |

| | |
|--------------------|--------------------------------|
| LEAD AGENCY | City of Los Angeles |
| CITY DEPARTMENT | Department of City Planning |
| STAFF CONTACT | Jason Hernández |
| ADDRESS | 200 N. Spring Street, Room 621 |
| PHONE NUMBER | 213.978.1276 |
| EMAIL | jason.hernandez@lacity.org |

| | |
|------------------|--|
| APPLICANT | VSF School Facilities #2 LLC |
| ADDRESS | 680 Wilshire Place, Suite 315 Los Angeles, CA 90005 |
| PHONE NUMBER | 213.388.8676 |

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION

(To be completed by the 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.

Jason Hernández

PRINTED NAME

SIGNATURE

City Planning Associate

TITLE

July 16, 2020

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

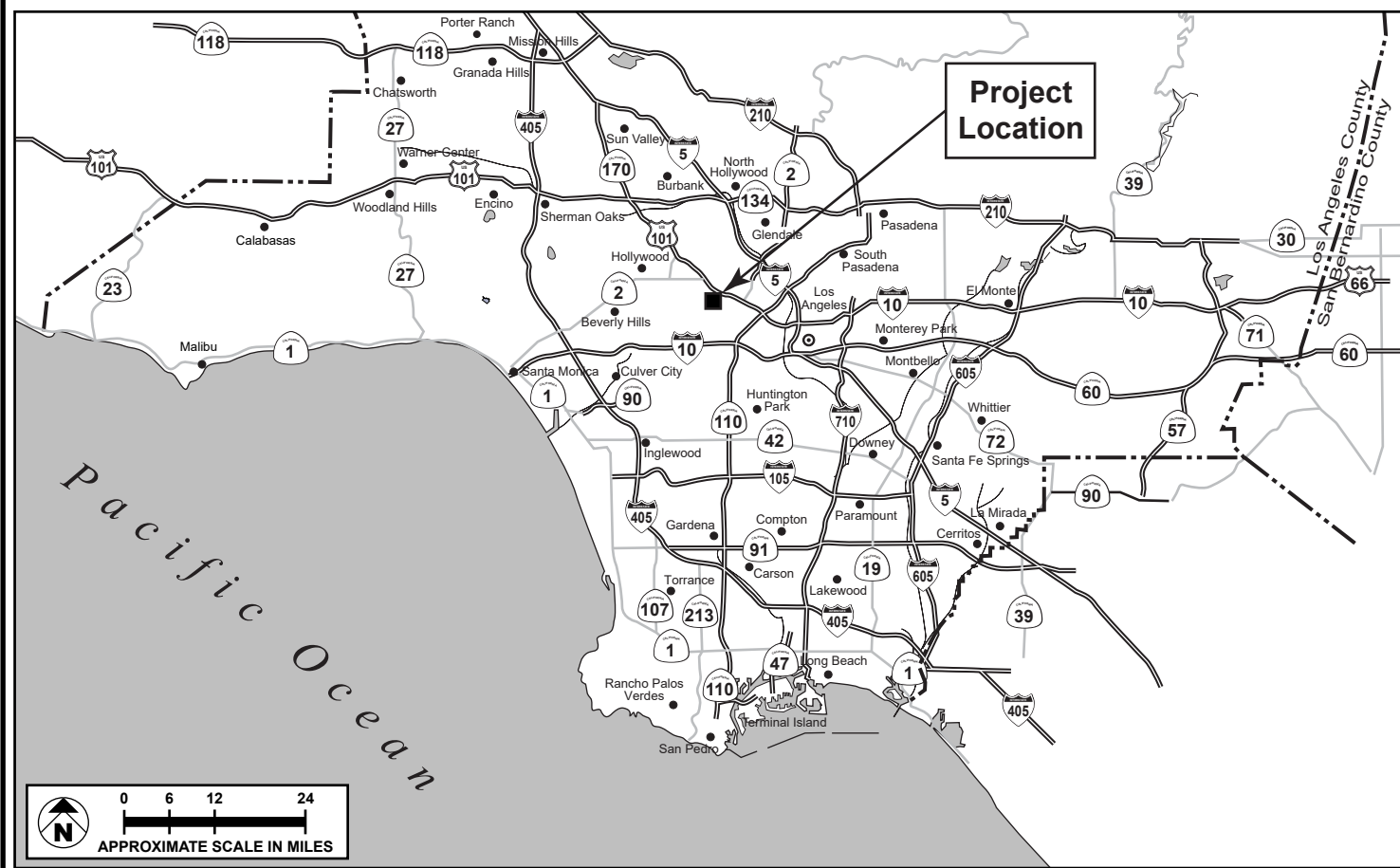
3.1 PROJECT SUMMARY

The Project Site is located at 233–245 N. Westmoreland Avenue, 3611–3627 W. Cosmopolitan Street, and 232–240 N. Madison Avenue in the City of Los Angeles (refer to **Figure 3.1-1: Regional and Local Vicinity Map**). The Project Site is located within the Wilshire Community Plan area and is designated as Limited Industrial.² The Applicant proposes the demolition of an existing single-story commercial/warehouse building located at the southeastern portion of the Project Site and the construction, use, and maintenance of a two-story, 32-foot in height, charter school within Subarea D (Light Industrial/Commercial) of the Vermont/Western SNAP. The proposed project includes a 24,360 square foot building for use as a public transitional kindergarten (TK) to 8th grade charter school (Proposed School), consisting of 20 classrooms, administrative offices, and outdoor recreational areas, which include playgrounds, lunch areas, planting gardens, basketball courts, and a soccer field (refer to **Figure 3.1-2: Proposed Site Plan**). The proposed maximum number of students enrolled would be 480 students. The site is located on a 53,353 square-foot lot that would include 24,360 square feet of total floor area with a Floor Area Ratio (FAR) of 0.46:1.

The proposed Project includes an on-site pickup/drop-off area which will be accessed by a driveway providing inbound and outbound access for vehicles from Cosmopolitan Street. A secondary driveway is proposed to provide outbound traffic on Madison Avenue. The Project would provide 28 surface parking spaces within a surface parking located on-site the southern portion of the site.

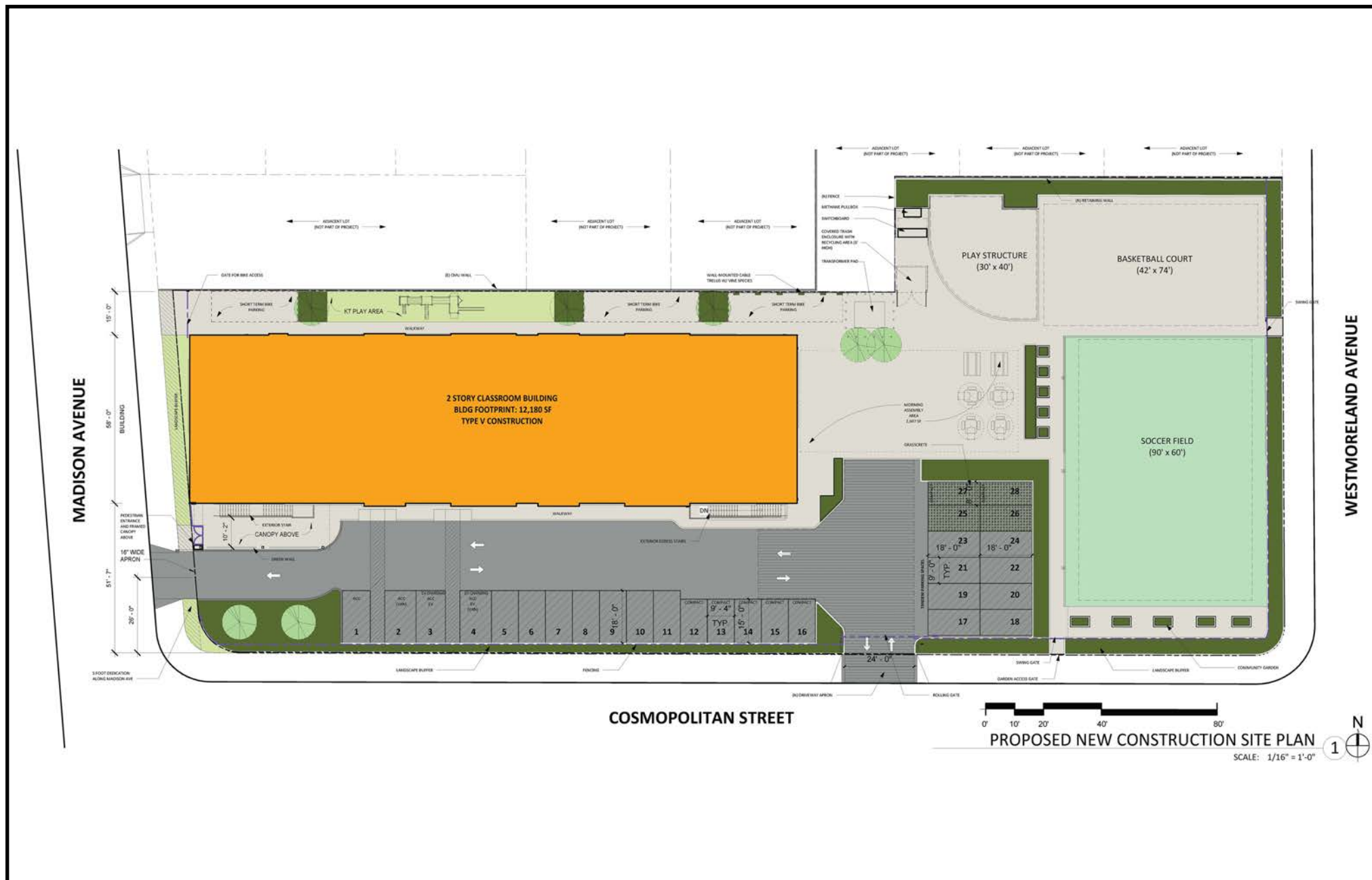
The Proposed School would regularly be operational Monday through Friday from 8:00 AM to 2:45 PM. Special events would include, but not limited to, before school program, musical performances and athletic practice/games which may occur between the hours of 6:00 AM to 9:00 PM Monday through Friday. Additionally, occasional on-site activities may occur on Saturdays, which would take place from 8:00 AM to 5:00 PM and Sundays from 12:00 PM to 5:00 PM.

² City of Los Angeles, Department of City Planning, *Wilshire Community Plan General Plan Land Use Map* (March 5, 2014), <https://planning.lacity.org/odocument/2ec22248-3c1e-4354-b5d1-096cdf9845ab/wilplanmap.pdf>.



SOURCE: Google Earth - 2020; Meridian Consultants, LLC - 2020

FIGURE 3.1-1



SOURCE: CSDA Design Group - January 2020

FIGURE 3.1-2

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 233–245 N. Westmoreland Avenue, 3611–3627 W. Cosmopolitan Street, and 232–240 N. Madison Avenue in the City of Los Angeles. As shown in **Table 3.1: Assessor Parcels**, The Project Site is comprised of 10 parcels (five associated Assessor's Parcel Numbers) totaling 53,353 square feet. The Project Site is bounded by Cosmopolitan Street on the south, Westmoreland Avenue on the east, and Madison Avenue on the west. To the north, the Project Site abuts parcels which are developed with commercial and retail uses; to the south is a site developed with the Central City Value High School; to the east is a site developed with a commercial car wash and public storage; and to the south and southwest is a campus housing Virgil Middle School, and CWC Silver Lake Middle School. The Project Site is located within the Wilshire Community Plan and Subarea D (Light Industrial/Commercial) of the Vermont/Western SNAP.

TABLE 3.1
ASSESSOR PARCELS

| APN | Address |
|--------------|----------------------------------|
| 5501-009-021 | 3619 – 23 W. Cosmopolitan Street |
| | 240 N. Madison Avenue |
| | 236 N. Madison Avenue |
| | 232 N. Madison Avenue |
| 5501-009-012 | 3615 W. Cosmopolitan Street |
| 5501-009-022 | 237 N. Westmoreland Avenue |
| | 233 N. Westmoreland Avenue |
| 5501-009-008 | 245 N. Westmoreland Avenue |
| 5501-009-009 | 241 N. Westmoreland Avenue |

3.2.2 Existing Conditions

The Project Site is currently developed with a single-story commercial/warehouse building, which was approved for construction on August 8, 1934. The Project site is occupied by a moving and storage facility and a paved parking area consisting of 20 parking spaces which were added on July 22, 1975. The subject site is on a 53,353 square-foot lot and currently zoned M1-1, designated for Limited Industrial land uses. The property is located 1.61 kilometers from the Puente Hills Blind Thrust Fault Zone and located within Bureau of Engineering's (BOE) Special Grading Area and methane zone. The site is not within a designated hillside, airport hazard, coastal zone, farmland, fire hazard severity zone, hazardous waste site, landslide, liquefaction, fault rupture, or tsunami inundation zone. There are eight (8) non-protected trees on-site that will be removed as part of the project scope.

3.2.3 Surrounding Land Uses

The Project Site is surrounded by M1-1 zoned parcels of varying types of uses within Subarea D of the Vermont/Western SNAP. Properties to the north, along Beverly

Boulevard, are currently developed with a variety of commercial and retail uses. The property to the south, across Cosmopolitan Street, is currently developed with the Central City Value High School. The Central City Value High School is operated by the Applicant pursuant to an approved Specific Plan Exception approved by the City on December 27, 2004, for a charter high school of 480 students in the M1-1 zone.³ The property to the east, across Westmorland Avenue, is currently developed with a commercial car wash and a 13-story building used for public storage. The property to the west, across Madison Avenue, is zoned M1-1 and PF-1XL, located within Subarea D and Subarea E (Community Facilities) of the SNAP, and currently developed with Virgil Middle School and CWC Silver Lake Middle School.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The proposed Project includes the demolition of an existing single-story commercial/warehouse building located at the southeastern portion of the Project Site and the construction, use, and maintenance of a two-story, 32-foot in height, charter school within Subarea D of the Vermont/Western SNAP. The proposed Project includes a 24,360 square foot building for use as a public transitional kindergarten (TK) to 8th grade charter school, administrative offices, and outdoor recreational areas, which include playgrounds, lunch areas, planting gardens, basketball courts, and a soccer field. The proposed maximum number of students enrolled would be 480 students.

The ground floor will consist of a lobby/front desk area, Transitional Kindergarten, Kindergarten, and 1st through 4th grade classrooms. A 1,022 square foot multipurpose room will be located on the eastern portion of the ground floor. An outdoor play/gathering area with sports courts would be located to the east of the two-story building.

The second floor will consist of multiple 5th through 8th grade classrooms, separate boys and girls changing rooms, office space, and a STEM/Computer Lab. Various administrative office spaces will be located throughout this floor and a lab room at the northwestern portion.

The school's campus will include recreational spaces for students, including a soccer field, basketball and handball courts, playground and turf play area at the eastern portion of the site. A play area reserved for the TK through Kindergarten students are located at the northwest portion of the Project site.

The Project Site consists of 10 lots which are zoned M1-1 and have a General Plan land use designation of Limited Industrial. The Project Site is not subject to any height, transitional height or number of story restrictions. In addition, the Project's proposed 2-stories is compatible with surrounding development, which is comprised of single and multi-story structures, including the Central City Value High School to the south and the 13-story building use for public storage to the east. The M1-1 Zone limits the FAR to a maximum of 1.5 to 1. The Project proposes a total floor

3 ZIMAS, Case No. APCC-2004-1841-SPE-SPP.

area of 24,360 square feet, resulting in a FAR of 0.46 to 1.

The proposed school will contain 20 classrooms for 480 students, 13 administrative staff and 38 teachers and teacher aides. The maximum enrollment projections are as follows:

| Grade | 2021 - 2022 | 2022 - 2023 | 2023 - 2024 | 2024 - 2025 |
|-------|-------------|-------------|-------------|-------------|
| TK/K | 42 | 42 | 42 | 42 |
| 1 | 40 | 42 | 42 | 42 |
| 2 | 25 | 50 | 50 | 50 |
| 3 | 30 | 30 | 50 | 50 |
| 4 | 30 | 30 | 50 | 50 |
| 5 | 30 | 30 | 30 | 60 |
| 6 | 62 | 62 | 62 | 62 |
| 7 | 31 | 62 | 62 | 62 |
| 8 | 31 | 31 | 62 | 62 |
| Total | 321 | 379 | 450 | 480 |

The project will consist of 1,506 cubic yards of export which would be hauled to 5990 E. Foothill Boulevard, Irwindale. The planned construction traffic would utilize the US 101, I-10 and I-605 Freeways via Westmoreland Avenue, Temple Street and Silver Lake Boulevard and minimize the use of surface streets.

The requested entitlements include a Conditional Use Permit, Project Permit Compliance Review, Specific Plan Exception, and Waiver of Street Dedications and/or Improvements for the project, pursuant to Section 12.24 U.24, Section 11.5.7 C, Section 11.5.7 F, and Section 12.37 of the LAMC and the Vermont/Western SNAP Ordinance No. 184,888, respectively.

3.3.2 Design and Architecture

The Project would include transparent building elements such as windows, and doors that occupy at least 20 percent of the exterior wall surface of all the ground floor facades. All exterior building walls would be designed to provide a break in the plane, or a change in material every 30 feet in horizontal length and every 30 feet in vertical length. This would be achieved by a combination of the following features: a change in plane of at least 6 inch for a distance of not more than 30 feet, recessed entry ways, the use of metal canopies and metal screen mesh with ivy, exterior stairwells, outdoor decks, varying color blocks, and painted large-scale school name lettering and mascot image that create a visual break on all four sides of the building.

The school building would include at least two (2) types of complementary building materials to exterior building facades: (1) Stucco; and (2) a combination of the Metal Mesh Screen and Climbing Ivy.

All surface or ground mounted mechanical equipment, including transformers, terminal boxes, pull boxes, air conditioner condensers, gas meters and electric meter cabinets would be screened (with a metal screen) from public view and treated to match the materials and colors of the building which they serve.

Building roof lines in excess of 30 feet would be broken up through the use of architectural geometric extrusions that would provide for dynamic variation along the roofline and would also extrude outwardly and create a mass that provides to the overall building façade.

All freestanding walls would be decorative consisting of wrought iron fences with 5 feet masonry walls. All freestanding walls would be setback from the property line adjacent to the three abutting public streets with a landscaped buffer and coordinated with location of trees. Chain-link, barbed and concertina fences would not be utilized.

Paved areas, excluding parking and driveway areas, would consist of enhanced paving materials such as stamped concrete and permeable paved surfaces.

The Project will provide speed bumps at areas where pedestrian walkways and a driveway share similar paths for more than 50 feet. The speed bumps would be provided on the driveway at a distance of no more than 20 feet apart.

3.3.3 Open Space and Landscaping

Areas not used for buildings, driveways, parking, recreational facilities, or pedestrian amenities would include landscaping. The planting palette uses a variety of drought tolerant shrubs that are intended to provide privacy screening where needed, while also adding color, texture, and movement to both interior and exterior edges of the site. Using primarily California native shrub species, the palette provides colorful seasonal interest and structural accents that punctuate a billowing background of grasses. Street trees would be provided with 36 inch box shade trees planted every 20 feet in the public right of way with 4 feet by 8 feet black cast iron tree well covers. In addition, 24 inch box shade trees would be planted every 20 feet adjacent to surface parking.

3.3.4 Access, Circulation, and Parking

The main pedestrian entrance would be provided directly from the sidewalk along Madison Avenue. A second pedestrian entrance would be provided along Cosmopolitan Street, which would provide direct access to the playground as well as access to short-term and long-term bicycle parking on the northern portion of the site. The third pedestrian access point on Westmoreland Avenue serves as an emergency exit for egress only. The Project would provide pick-up/drop-off inbound vehicle access on-site. The proposed Project includes an on-site pickup/drop-off area which will be accessed by a driveway providing inbound and outbound access for vehicles from Cosmopolitan Street. A secondary driveway is proposed to provide outbound traffic on Madison Avenue. The Project would provide 28 surface parking spaces within a surface parking located on-site the southern portion of the site.

3.3.5 Lighting and Signage

As mentioned previously, the main pedestrian entrance would be located along Madison Avenue which would include the Everest Value School sign overhead. The lettering is approximately 12 inches high by 6 feet wide. The painted graphic signs on the building accentuate the north building entrance and the northeast corner of the building meant to be seen by students and staff on the playground and inspire school spirit and pride. On-site lighting would be installed along all vehicular access ways and pedestrian walkways. Parking areas would have a minimum of 3/4 foot-candle of flood lighting measured at the pavement. All on-site lighting would be directed away from adjacent properties.

3.3.6 Site Security

Security devices would be screened from public view. If metal security grills are used, grills which recess into pockets or overhead cylinders, completely concealed and retractable would be used.

3.3.7 Special Events

The Proposed School would regularly be operational Monday through Friday from 8:00 AM to 2:45 PM. Special events would include, but not limited to, before school program, musical performances and athletic practice/games which may occur between the hours of 6:00 AM to 9:00 PM Monday through Friday. Additionally, occasional on-site activities may occur on Saturdays, which would take place from 8:00 AM to 5:00 PM, and Sundays from 12:00 PM to 5:00 PM.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Negative Declaration will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1. Pursuant to **Los Angeles Municipal Code (LAMC) Section 12.24.U.24**, a Conditional Use to permit the new development of a TK-8th grade public charter school and its accessory uses on an M1-1 zoned Project Site.
2. Pursuant to **LAMC Section 11.5.7 C**, the Applicant requests a Specific Plan Exception for relief from the following Vermont/Western Station Neighborhood Plan ("SNAP") requirements:
 - a. **SNAP Section 10.B: Maximum Building Setback**. At least 75 percent of the Ground Floor exterior wall along the building frontage shall be located no more than ten feet from any lot line parallel to a public street, excluding alleys; and
 - b. **SNAP Development Standards and Design Guidelines Section VI.12: Parking Behind Buildings**. To allow the surface parking lot to not be placed in the rear of the building and located within 20 feet of a public street.
3. Pursuant to **LAMC Section 12.37**, a Waiver of Street Dedication and/or Improvement for the five-foot dedication requirement to the northern side of Cosmopolitan Street which adjoins the project site's street frontage.
4. The Applicant will request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction actions including, but not limited to, the following: demolition, temporary street closure, excavation, shoring, grading, haul route, foundation, and building.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Except as provided in Public Resources Code Section 21099 would the project: | | | | |
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Have a substantial adverse effect on a scenic vista?

No Impact. A scenic vista, as defined by the California Department of Transportation, is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. A significant impact would occur if the Project would have a substantial adverse effect on a scenic vista. A focal point view would consist of a view of a notable object, building, or setting. Diminishment of a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected.

The existing visual character of the surrounding area is highly urban and the Project Site is not located on or near any scenic vistas that would be impeded. No impact would occur and no mitigation measures are required.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. A significant impact would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway. There are no identified scenic resources such as rock outcroppings or historic buildings located on-site. The building has not been identified as requiring Historic Preservation Review. The City of Los Angeles' General Plan Mobility Element (Citywide General Plan Circulation System Maps) as well as the CalTrans website at http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/lanageles.htm indicates that no State-designated scenic highways are located near the project site. No impacts would occur and no mitigation measures are required.

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?

No Impact. A significant impact would occur if the proposed Project would substantially degrade the existing visual character or quality of the site and its surroundings. Although the site and surrounding lots are similarly zoned M1-1, the existing uses in this area are not manufacturing or industrial. To the immediate east and north of the Project Site are a variety of commercial uses, including restaurants, a veterinary hospital/clinic, and a Public Storage facility. To the south and southwest of the Project Site are the campuses of Virgil Middle School, CWC Silver Lake Middle School and Central City Value High School. The Virgil Middle School/CWC site is zoned M1-1 and PF-1XL and the Central City Value High School is zoned M1-1 and located within Subarea D in the SNAP, similar to the Project Site.

Potential for degradation to the visual character and quality of the site and surrounding area would be further reduced with the following applicable Regulatory Compliance Measures (RCM), RC-AE-3 which, pursuant to LAMC Section 91.8104, requires that every building shall be maintained in a safe and sanitary condition and good repair, and free from debris, rubbish, garbage, trash, overgrown vegetation, or other similar material; and LAMC Section 91.8014.15, which requires that the exterior to all building and fences shall be free from graffiti when such graffiti is visible from a street or alley. The proposed Project would replace the existing commercial-warehouse buildings with a school building that responds to the specific plan design guidelines and provides play areas as well as landscaping areas throughout the site. In addition, new sidewalks and street trees would be provided as part of the project along the building frontage on Cosmopolitan St. and Madison Ave. Therefore, the Project would not conflict with applicable zoning and other regulations governing scenic quality. No impacts would occur and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact would occur if light and glare substantially altered the character of off-site areas surrounding the site or interfered with the performance of

an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and night-time hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions. Due to the urbanized nature of the area, a moderate level of ambient nighttime light already exists. Nighttime lighting sources include street lights, vehicle headlights, and interior and exterior building illumination. Parking areas would have a minimum of $\frac{3}{4}$ foot-candle of flood lighting measured at the pavement. All on-site lighting would be directed away from adjacent properties and would not substantially change existing ambient nighttime lighting conditions. The proposed Project does not include any elements or features that would create substantial new sources of glare. Therefore, light and glare impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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?

No Impact. A significant impact would occur if the proposed project would convert valued farmland to non-agricultural uses. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Section 3, Project Description, of this IS, the Project Site is currently developed with a single-story commercial/warehouse building. In addition, the uses surrounding the Project Site primarily include commercial and industrial uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.⁴ In addition, the proposed Project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. As such, no impacts would occur and no mitigation measures are required.

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

No Impact. A significant impact would occur if the proposed project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The Project Site is zoned by the LAMC as M1-1 (Limited Industrial Zone, Height District 1). The Project Site is not zoned for agricultural use. Furthermore, none of the surrounding properties are zoned for agricultural use. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.⁵ Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required.

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

No Impact. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland, or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The Project Site is located in an urbanized area and is currently developed with a single-story commercial/warehouse building. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for industrial uses and is not zoned and/or used as forest land.⁶ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required.

4 State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, <https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>, accessed March 9, 2020.

5 State of California Department of Conservation, Division of Land Resource Protection, Williamson Act Contract Land, https://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx, accessed March 9, 2020.

6 US Forest Service: <https://www.fs.usda.gov/detailfull/angeles/maps-pubs/?cid=FSEPRD535505&width=full>, accessed March 9, 2020.

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

No Impact. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland, or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required.

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

No Impact. A significant impact would occur if the proposed project caused the conversion of farmland to non-agricultural use. The Project Site is located in a highly developed area and zoned for commercial manufacturing land uses under the Vermont/Western SNAP, Subarea D. The Project Site is entirely developed and located in a developed area of the City, and no agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. As such, the Project would not result in the conversion of farmland to nonagricultural use. No impacts would occur, and no mitigation measures are required.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The following section summarizes and incorporates by reference information from the *Air Quality Study* prepared by Vincent Mirabella, dated June 8, 2020, on behalf of the Applicant. The Air Quality Study is included as **Appendix A** of this ND.

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

Less Than Significant Impact. The South Coast Air Basin (Basin) is designated nonattainment at the federal and State level for ozone and PM2.5. SCAQMD has 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 Basin.

Construction

All construction activities would be conducted in compliance with the South Coast Air Quality Management District (SCAQMD) rules pertaining to Fugitive Dust (Rule 403)⁷ and Architectural

⁷ South Coast Air Quality Management District (SCAQMD), *Fugitive Dust (Rule 403)*, <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

Coating (Rule 1113)⁸, and heavy-duty diesel equipment would meet minimum California Air Resources Board (CARB) off-road fleet requirements.

Construction impacts include emissions associated with site demolition, grading/preparation, utilities installation, construction of buildings, paving, and architectural coating. Construction emissions result from on- and off-site activities. On-site emissions principally consist of exhaust emissions from the activity levels of heavy-duty construction equipment, motor vehicle operation, and fugitive dust (mainly PM10) from disturbed soil. Additionally, paving operations and application of architectural coatings would release ROG emissions. Off-site emissions are caused by motor vehicle exhaust from haul trips due to the 1,506 cubic yards of export, delivery vehicles, worker traffic, and road dust (PM10 and PM2.5).

The analysis of daily construction emissions was prepared utilizing CalEEMod recommended by SCAQMD. **Table 4.1: Maximum Construction Emissions** presents the maximum estimated daily emissions anticipated to occur throughout the duration of Project construction.

TABLE 4.1
MAXIMUM CONSTRUCTION EMISSIONS

| Source | VOC | NOx | CO | SOx | PM10 | PM2.5 |
|-----------------------------|------------|-----------|-----------|-----------|-----------|-----------|
| | pounds/day | | | | | |
| Maximum | 23.5 | 25.1 | 17.3 | 0.0 | 4.5 | 1.9 |
| SCAQMD Mass Daily Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Threshold exceeded? | No | No | No | No | No | No |

Source: CalEEMod.

Notes:

CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Refer to **Appendix A**.

Emissions of volatile organic compounds (VOC), nitrogen oxides (NOx), carbon monoxide (CO), sulfur oxides (SOx), and particulate matter (PM10 and PM2.5) are compared against the applicable SCAQMD mass daily thresholds of significance. As shown in **Table III-1**, maximum daily emissions during construction would be below the applicable SCAQMD maximum daily emission thresholds. Accordingly, air quality emissions associated with construction of the Project would have a less than significant effect on the environment.

Operation

The Project would generate air pollutant emissions during operation from normal day-to-day use of the Project through area, energy, and mobile sources. Area source emissions would be generated by landscape and maintenance equipment, generators, and the use of consumer products. Energy source emissions are generated as a result of activities in buildings for which

⁸ SCAQMD, *Architectural Coatings (Rule 1113)*, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

natural gas is used (e.g., natural gas for heat or cooking). Mobile source emissions would be generated by the increase in motor vehicle trips, such as student drop-off/pickup and staff vehicles to and from the Project Site.

The analysis of daily operational emissions associated with the Project was prepared utilizing CalEEMod. The results of these calculations are presented in **Table 4.2: Maximum Operational Emissions**. Note that the operational results reflect the net change resulting from the removal of existing uses. As shown in **Table 4.2**, the net daily operational emissions attributed to the Project's operation would not exceed the SCAQMD-established operational significance thresholds. Accordingly, air quality impacts associated with operation of the Project would have a less than significant effect on the environment.

TABLE 4.2
MAXIMUM OPERATIONAL EMISSIONS

| Source | VOC | NOx | CO | SOx | PM10 | PM 2.5 |
|-----------------------------|------------|------|------|-----|------|--------|
| | pounds/day | | | | | |
| Area | 0.9 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Energy | 0.0 | 0.1 | 0.1 | 0.0 | 0.0 | 0.0 |
| Mobile | 1.4 | 1.9 | 22.8 | 0.1 | 6.9 | 1.9 |
| Subtotal | 2.3 | 2.0 | 22.9 | 0.1 | 6.9 | 1.9 |
| Existing | 0.6 | 5.9 | 1.3 | 0.0 | 0.3 | 0.1 |
| Net Total | 1.7 | -3.9 | 21.6 | 0.1 | 6.6 | 1.8 |
| SCAQMD Mass Daily Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Threshold exceeded? | No | No | No | No | No | No |

Source: CalEEMod.

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.

CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Refer to **Appendix A**.

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?

Less Than Significant Impact. A significant impact would occur if the proposed Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Project construction and operation emissions are estimated using California Emissions Estimator Model (CalEEMod), a Statewide land use emissions computer model designed to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from land use projects. According to the CalEEMod model results for similar types of projects, Overall Construction (Maximum Daily Emission) for the proposed Project would not exceed the SCAQMD thresholds for the criteria pollutants Reactive Organic Compounds (ROG), Nitrogen Oxides (NOx), Carbon Monoxide (CO), Sulfur Dioxide (SO2), and Respirable Particulate Matter (PM10 and PM2.5). The Project is estimated to generate less than the SCAQMD threshold of 75 pounds per day (lbs/day) for ROG, 100 lbs/day for NOx, 550 lbs/day

for CO, 150 lbs per day for SO₂, 150 lbs/day for PM₁₀, and 55 lbs/day for PM_{2.5}. Additionally, the Project output is also below the significance thresholds for these criteria pollutants with regard to Overall Operational Emissions. The Project is estimated to generate less than the SCAQMD threshold of 55 pounds per day (lbs/day) for ROG, 55 lbs/day for NO_x, 550 lbs/day for CO, 150 lbs per day for SO₂, 150 lbs/day for PM₁₀, and 55 lbs/day for PM_{2.5}. Motor vehicles that access the Project Site would be the predominant source of long-term project emissions. Additional emissions would be generated by area sources, such as energy use and landscape maintenance activities. Therefore, the proposed Project would result in a less-than-significant impact related to regional operational emissions.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities.

Localized Significant Emission Concentrations

The SCAQMD *Final Localized Significance Threshold [LST] Methodology*⁹ provides guidance on analysis of localized air quality impacts. Maximum daily LST values were derived for emissions of NO_x, CO, PM₁₀, and PM_{2.5} that would be generated during construction and operation of the Project. The results of the LST analysis are provided in **Table 4.3: Localized Construction and Operational Emissions**. These estimates assume the maximum area that would be disturbed during construction on any given day during Project buildout. Construction would comply with SCAQMD's Rule 403 (Fugitive Dust), which requires watering of the site during dust-generating construction activities, stabilizing disturbed areas with water or chemical stabilizers, and preventing track-out dust from construction vehicles. As shown in **Table 4.3**, emissions would not exceed the localized significance construction and operational thresholds. As such, impacts would be less than significant, and no mitigation measures are required.

TABLE 4.3
LOCALIZED CONSTRUCTION AND OPERATIONAL EMISSIONS

| | NOx | CO | PM10 | PM2.5 |
|---|--------------------------------|-----------|-----------|-----------|
| Source | On-Site Emissions (pounds/day) | | | |
| Construction | | | | |
| Total maximum unmitigated emissions | 18.3 | 17.3 | 3.7 | 1.9 |
| LST threshold ¹ | 74 | 680 | 99 | 45 |
| Threshold Exceeded? | No | No | No | No |
| Operational | | | | |
| Project area/energy unmitigated emissions | 0.4 | 3.2 | 0.1 | 0.0 |
| LST threshold ¹ | 74 | 680 | 24 | 11 |
| Threshold Exceeded? | No | No | No | No |

9 SCAQMD, *Final Localized Significance Threshold Methodology* (2008), p. 3-3, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>.

| Source | NOx | CO | PM10 | PM2.5 |
|--------|--------------------------------|----|------|-------|
| | On-Site Emissions (pounds/day) | | | |

Notes:

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

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

¹ Threshold derived for 25 meter receptor distance for NOx and CO and 280 meters for PM10 and PM2.5.

Source: Vincent Mirabella, Air Quality and Health Risk Analysis Report, dated October 15, 2019.

Toxic Air Contaminants

Project construction would result in short-term emissions of diesel particulate matter, which is a toxic air contaminant (TAC). Off-road heavy-duty diesel equipment would emit diesel particulate matter over the course of the construction period. Localized diesel particulate emissions (strongly correlated with PM2.5 emissions) would be minimal and would be substantially below localized thresholds. Project compliance with CARB's anti-idling measure, which limits idling to no more than 5 minutes at any location for diesel-fueled commercial vehicles, would further minimize diesel particulate matter emissions in the Project area.

Project operations would generate only minor amounts of diesel emissions from delivery trucks and incidental maintenance activities. Trucks would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce emission from existing diesel trucks. In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the Proposed School within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the SCAQMD thresholds of significance.

In compliance with the relevant California codes regarding school siting, an analysis was prepared that quantifies the potential impacts from TAC emissions from sources located within one-quarter of a mile of the proposed Project. Two major TAC emission sources located within one-quarter of a mile surrounding the site include the US 101 Freeway and stationary sources.

Table 4.4: Cancer Risks and Chronic Non-Cancer Hazards at the Project from the US 101 Freeway, summarizes the calculated cancer risks and chronic non-cancer hazard index for the Project's student sensitive receptors and the workers.

TABLE 4.4

CANCER RISKS AND CHRONIC NON-CANCER HAZARDS AT THE PROJECT FROM THE US 101 FREEWAY

| Receptor | DPM Concentration at Maximum Exposed Receptor (µg/m ³) | Cancer Risk at Maximum Exposed Receptor (risk/million) | SCAQMD Cancer Risk Significance Threshold (risk/million) | Exceeds Threshold? |
|----------|--|--|--|--------------------|
| Student | 0.0162 | 2 | 10 | No |
| Worker | 0.0162 | 1 | 10 | No |

| | | <i>Chronic Non-Cancer Hazard Index</i> | <i>SCAQMD Non-Cancer Hazard Index Significance Threshold</i> | |
|-------------|--------|--|--|----|
| School Site | 0.0162 | 0.003 | 1.0 | No |

Note that the cancer risks shown in **Table 4.4** do not include consideration of the expected reductions in risks due to the requirement to place an air filtration system within the school buildings located 1,000 feet of a freeway equipped with MERV 13 filters in accordance with the City of Los Angeles Ordinance 184245. This ordinance implements building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns within the City of Los Angeles. Single-pass outdoor-origin PM_{2.5} removal efficiencies range from less than 10 percent for MERV 6 to over 95 percent for MERV 16 and HEPA filters. The MERV 13 rated filters were assumed to remove approximately 60 percent of the outside particulate matter levels. As a result, the inclusion of the MERV 13 filtration system would reduce the cancer risks shown in **Table 4.4** to less than one in one million.

The AERMOD air dispersion model was used to estimate the potential cancer risk and health hazards to the future students and staff at the proposed Project from the TAC emissions. The emission source was treated as a point source emitted at the top of the source building at building temperature. The maximum cancer risk and non-cancer hazards at the Project Site from TAC emissions from this source are summarized in **Table 4.5: Cancer Risks and Chronic Non-Cancer Hazards to the Project from the Facility ID 181862**. As shown in **Table III-5**, the combined risks and hazards are well below the SCAQMD health risk and hazard significance threshold. As such, impacts would be less than significant, and no mitigation measures are required.

TABLE 4.5
CANCER RISKS AND CHRONIC NON-CANCER HAZARDS TO THE PROJECT FROM THE FACILITY ID 181862

| Receptor | Cancer Risk at Maximum Exposed Receptor (risk/million) | SCAQMD Cancer Risk Significance Threshold (risk/million) | Exceeds Threshold? |
|-------------|--|--|--------------------|
| Student | <0.001 | 10 | No |
| Worker | <0.001 | 10 | No |
| | <i>Chronic Non-Cancer Hazard Index</i> | <i>SCAQMD Non-Cancer Hazard Index Significance Threshold</i> | |
| School Site | <0.001 | 1 | No |
| | <i>Acute Non-Cancer Hazard Index</i> | <i>SCAQMD Non-Cancer Hazard Index Significance Threshold</i> | |
| School Site | <0.001 | 1 | No |

Note: Facility ID 181862: Network Auto Body, Inc. located at 3718 Beverly Boulevard, Los Angeles.

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

Less Than Significant Impact. As shown in **Table 4.3** above, construction of the Project would result in emissions below the localized significance thresholds. Mandatory compliance with SCAQMD Rule 1113 would limit the number of VOCs in architectural coatings and solvents.

According to SCAQMD, while almost any source may emit objectionable odors, some land uses are more likely to produce odors because of their operation. The Proposed School uses would not emit substantial objectionable odors. Any unforeseen odors generated by the Project will be controlled in accordance with SCAQMD Rule 402. As such, impacts would be less than significant, and no mitigation measures are required.

IV. BIOLOGICAL RESOURCES

| Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--------------------------------------|--|------------------------------------|-----------|
|--------------------------------------|--|------------------------------------|-----------|

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

No Impact. A project would have a significant biological impact through the loss or destruction of individuals of a species or through the degradation of sensitive habitat. The Project Site is located in an urbanized area and is currently developed with a single-story commercial/warehouse building. Due to the urbanized and disturbed nature of the Project Site and the surrounding developed areas, as well as lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Areas not used for buildings, driveways, parking, recreational facilities, or pedestrian amenities would include landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

Due to the lack of habitat on the Project Site, special status species listed by the California Department of Fish and Wildlife¹⁰ or by the U.S. Fish and Wildlife Service¹¹ would not be anticipated to be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.¹² The Project Site has eight (8) palm trees (Mexican Fan Palm [*Washingtonia robusta*]), all of which are proposed to be removed, however these trees are not considered to be sensitive plant species. There are no protected trees onsite. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code. Therefore, the Project would not have any adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No impacts would occur and no mitigation measures are required.

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

No Impact. A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. The Project Site is located in an urbanized area and is currently developed with a single-story commercial/warehouse building. No riparian

10 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, accessed March 9, 2020.

11 United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to
or known to occur in California, <https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=listed>,
accessed March 9, 2020.

12 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental
Impact Report, January 19, 1995, P. 2-18-4.

or other sensitive natural community exists on the Project Site.^{13,14} The Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.^{15,16} There are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.^{17,18,19} Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required.

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

No Impact. A significant impact would occur if federally protected wetlands would be modified or removed by a project. The Project Site is located in an urbanized area and is currently developed with a single-story commercial/warehouse building. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site.²⁰ As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required.

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

No Impact. A significant impact would occur if the proposed project would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites. No surface water bodies, streams or waterways occur on the Project Site. The Project Site does not provide nursery sites for wildlife, nor is it conducive to function as a corridor for migratory wildlife. Street trees would be planted in the public right of way and adjacent to the surface parking. 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. Nesting migratory birds are protected under the MBTA (United States Code, Title 16, Sections 703–712) and California Fish and Game Code Sections 3503 et seq. Compliance with federal MBTA and California Fish and Game Code would reduce the impact to a less than significant level. Therefore, the Project would not interfere with the movement of any native

13 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 9, 2020.

14 U.S. Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed March 9, 2020.

15 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

16 Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

17 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), www.wildlife.ca.gov/Data/BIOS, accessed March 9, 2020.

18 California Department of Fish and Wildlife, CDFW Lands, <https://www.wildlife.ca.gov/Lands>, accessed March 9, 2020.

19 U.S. Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed March 9, 2020.

20 U.S. Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed March 9, 2020.

resident or migratory species or impede the use of native wildlife nursery sites. No impact would occur and no mitigation measures are required.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

No Impact. A significant impact would occur if the proposed project would be inconsistent with local regulations pertaining to biological resources. The City of Los Angeles Protected Tree Ordinance (No. 177,404) requires the protection Southern California native tree species such as oak tree, Southern California black walnut, western sycamore, and California bay trees. The Project Site does not contain any locally protected trees. The proposed Project would remove eight (8) palm trees (Mexican Fan Palm [*Washingtonia robusta*]), however these trees are not considered to be sensitive plant species. Street trees would be provided with 36 inch box shade trees planted every 20 feet in the public right of way with 4 feet by 8 feet black cast iron tree well covers. In addition, 24 inch box shade trees would be planted every 20 feet adjacent to surface parking. Therefore, there would be no impact relating to conflicts with local policies and ordinances protecting biological resources. No impacts would occur and no mitigation measures are required.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No Impact. The Project Site is located in an urbanized area and is currently developed with a single-story commercial/warehouse building. As described above, the Project Site does not support any habitat or natural community.^{21, 22} No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.²³ Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required.

21 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 9, 2020.

22 United States Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed March 9, 2020.

23 California Department of Fish and Wildlife, California Regional Conservation Plans, October 2017.

V. CULTURAL RESOURCES

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

No Impact. A significant impact would occur if the proposed project would substantially alter the environmental context of, or remove identified historical resources. Section 15064.5 defines historic resources as resources listed or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources, resources included in a local register of historical resources or identified as significant in an historical resources survey meeting the requirements of Public Resources Code section 5024.1(g), and other resources considered to be historical resources by the lead agency based on substantial evidence. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

- i. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii. Is associated with the lives of persons important in our past;
- iii. Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
- iv. Has yielded, or may be likely to yield, information important in prehistory or history.

The Project Site is currently developed with a single-story commercial/warehouse building constructed in the 1930s, with a Certificate of Occupancy (CofO) issued in 1943 for an addition to the original structure. Subsequent additions have occurred at the commercial/warehouse building and their corresponding CofOs issued over the next several decades. Additionally, the building has not been identified as a historic resource by local or state agencies, and the project site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments

Register, and/or any local register. There are no identified historical resources on site according to Los Angeles Historic Resources Inventory²⁴ (OHR 2019). Moreover, the City of Los Angeles Office of Historic Resources concluded on June 9, 2020, that the project site is not a historical resource for purposes of CEQA. No impacts would occur and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. The depth and extent of grading and excavation would be limited. If an archaeological resource were to be discovered during construction of the Project, work in the area would cease, and deposits would first be evaluated for historic significance in accordance with CEQA Guidelines Section 15064.5. As set forth in CEQA Guidelines Section 15064.5, if the City determines that the archaeological resource is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code. If an archaeological resource does not meet the criteria for historical resources, but does meet the definition of a unique archaeological resource, construction work in the area would cease and the resource would be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. Therefore, given that there are no identified archaeological sites within the Project Site and the available regulations governing the treatment of any uncovered archaeological resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource. With the implementation of regulatory requirements, impacts to archaeological resources would be less than significant, and no mitigation measures are required.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. Human remains could be encountered during excavation and grading activities associated with the proposed project. While no formal cemeteries, other places of human

²⁴ City of Los Angeles Office of Historic Resources (OHR). 2019. HistoricPlacesLA: Los Angeles Historic Resources Inventory Map. <http://www.historicplacesla.org/map>.

interment, or burial grounds or sites are known to occur within the project area, there is always a possibility that human remains can be encountered during construction. In addition, if human remains were discovered during construction, demolition, and/or grading activities of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code (PRC) Section 5097.91 and 5097.98. If human remains of Native American origin are discovered during project construction, compliance with state laws, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (PRC Section 5097), relating to the disposition of Native American burials will be adhered to. Therefore, impacts related to human remains would be less than significant, and no mitigation measures are required.

VI. ENERGY

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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 III: Air Quality** and **Section VIII: Greenhouse Gas Emissions**, and on the calculations for this section as presented in **Appendix B: Energy Calculations**.

a. 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. A significant impact would occur if the project would substantially increase demand for energy resources, which exceeds the available supply. The Project would be constructed in accordance with all applicable laws and regulations, including applicable State and federal laws, and building regulations pursuant to the LAMC and LAGBC that are intended to promote efficient utilization of resources and minimize environmental impacts.

Construction

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Compliance with anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Construction of the proposed Project would require the use of various forms of energy. **Table 4.6: Summary of Energy Use During Construction**, summarizes the quantity of petroleum fuels and electricity that would be consumed during construction. As shown in **Table 4.6**, 18,275 gallons of diesel fuel, 1,454 gallons of gasoline fuel, and 8,631.1 kWh kilowatt-hours of electricity would be consumed during construction. When compared to the worldwide oil supply in 2024 of 104.8 million barrels per day, and the City's estimated power demand of 22,332 gigawatt-hours, 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.

TABLE 4.6
SUMMARY OF ENERGY USE DURING CONSTRUCTION

| Fuel Type | Quantity |
|--|----------------|
| <i>Diesel</i> | |
| On-Site Construction Equipment | 9,403 Gallons |
| Off-Site Motor Vehicles | 8,872 Gallons |
| <i>Total</i> | 18,275 Gallons |
| <i>Gasoline</i> | |
| On-Site Construction Equipment | 0 Gallons |
| Off-Site Motor Vehicles | 1,454 Gallons |
| <i>Total</i> | 1,454 Gallons |
| <i>Electricity</i> | 8,635.1 kWh |
| Note: Refer to Appendix B for Energy Calculations | |

Operation

During operation, energy would be consumed for a variety of purposes, including electricity consumption for lighting, appliances, HVAC equipment, water supply and delivery, and other commercial operations that include transportation fuel consumption from motor vehicles driving to and from the site.

The Project would implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use. The Project would comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria. The Project would also comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

Table 4.7: Summary of Annual Energy Use During Operation, summarize 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 22,332 gigawatt-hours by 2022, the anticipated Project buildout year. As shown in **Table 4.7**, the proposed Project would use 187,258 kWh per year, which is less than 1 percent of the forecasted demand. LADWP expects to have adequate electricity supply and transmission capability to meet the needs of its customers well beyond the buildout year of 2022. 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 generation or transmission facilities.

Natural gas consumption would increase during Project operations. The total gas supply available in 2022 is estimated to be 2,519 MMcf per day,²⁵ equivalent to 2,569,380 million British thermal units (Btu) per year or 2,569,380,411 thousand Btu (kBtu).²⁶ As shown in **Table 4.7**, the proposed Project would use approximately 380,808 KBTu per year, which is less than 1 percent of forecasted demand.

TABLE 4.7
SUMMARY OF ANNUAL ENERGY USE DURING OPERATION

| Source | Units | Project | Existing | Total |
|--------------------------|---------|---------|---------------------|-----------------------|
| Electricity | | | | |
| Elementary School | kWh/yr | 237,567 | -- | 241,988 |
| Parking Lot | kWh/yr | 4,421 | -- | |
| Parking Lot | kWh/yr | -- | 12,250 | 54,730 |
| Unrefrigerated Warehouse | kWh/yr | -- | 42,480 | |
| | | | <u>TOTAL</u> | <u>187,258</u> |
| Natural Gas | | | | |
| Elementary School | kBTU/yr | 417,348 | -- | 417,348 |
| Parking Lot | kBTU/yr | 0 | -- | |
| Parking Lot | kBTU/yr | -- | -- | 36,540 |
| Unrefrigerated Warehouse | kBTU/yr | -- | 36,540 | |
| | | | <u>TOTAL</u> | <u>380,808</u> |

²⁵ California Gas and Electric Utilities, *2018 California Gas Report* (2018). Available at https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf.

²⁶ *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>.

| Mobile | | | | |
|--|---------|----|----|----|
| Diesel | Gallons | 12 | -- | 78 |
| Gasoline | Gallons | 66 | -- | |
| <div>Source: Refer to Appendix B for energy calculations.</div> | | | | |

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. The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.

As such, impacts related to energy consumption would be less than significant and no mitigation measures are required.

b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. State plans adopted for the purposes of promoting energy efficiency include the California Renewable Portfolio Standard, the Clean Energy and Pollution Reduction Act of 2015 (Senate Bill 350), the CARB's "In-Use Off-Road Diesel Fueled Fleets Regulation" and "Advanced Clean Cars Program," California Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, CCR Part 6), and the California Green Building Standards Code (CALGreen, CCR Part 11).

Local plans adopted for the purposes of promoting energy efficiency include the City of Los Angeles Sustainable City pLAn, the LAGBC, the LADWP 2017 Power Strategic Long-Term Resource Plan. In accordance with Senate Bill 1078, LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020.

The 2016 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards. The Project would be construction in accordance with all applicable laws and regulations, including State and federal laws, and building regulations pursuant to the LAMC and LAGBC that are intended to promote efficient utilization of resources and minimize environmental impacts. Thus, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant and no mitigation measures are required.

VII. GEOLOGY AND SOILS

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Directly or indirectly cause 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. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii. Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii. Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv. Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The following section summarizes and incorporates by reference information from the *Geotechnical Engineering Investigation* prepared by Geotechnologies, Inc. on behalf of the

Applicant. The Geotechnical Engineering Investigation and LADBS Soils Report Approval Letter is included as **Appendix C** of this ND.

a. 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 would occur if the proposed project would cause personal injury or death or result in property damage as a result of a fault rupture occurring on the project site and if the project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

The Project Site is not within a currently established Alquist-Priolo Earthquake Fault Zone.²⁷ In addition, according to the CGS, the Project Site is not located in an Earthquake Fault Zone.²⁸ Therefore, since no known faults are beneath the Project Site, the Project would not exacerbate existing environmental conditions such that rupture of a known earthquake fault would occur because of the Project. Furthermore, even though the Project would involve excavation for the subterranean parking levels, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust.

27 Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 11, 2020.

28 Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed March 11, 2020.

Therefore, the Project would not result in the rupture of a known earthquake fault caused in whole or in part by the Project's exacerbation of the existing environmental conditions and impacts would be less than significant, and no mitigation measures are required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. A significant impact would occur if the proposed project would cause personal injury or death or resulted in property damage as a result of seismic ground shaking. The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake. However, as previously stated in i) above, no active faults are known to pass directly beneath the Project Site and, therefore, the Project would not exacerbate existing environmental conditions (i.e., trigger an earthquake by disrupting a known earthquake fault) such that people or structures would be exposed to strong seismic ground shaking.

Although the Project would not exacerbate existing environmental conditions such that people or structure would be exposed to strong seismic ground shaking, the following discussion about seismic building codes is provided for informational purposes only. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. As with other development projects in the City of Los Angeles, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the 2016 California Building Code with City amendments. The 2016 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to lessen the effect of losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code. The Project would therefore be required to comply with the plan check review and permitting requirements of the Los Angeles Department of Building and Safety, including the incorporation of the recommendations provided in a final, site-specific geotechnical report. In addition, before permits can be issued for construction, the Project must demonstrate compliance with the applicable provisions of seismic safety plans and regulations, including, but not limited to, the Seismic Safety Act and Seismic Hazards Mapping Act.

Furthermore, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions like strong seismic ground shaking. Based on the above, development of the Project would not result in strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Impacts would be less than significant, and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a proposed project site is located within a liquefaction zone. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking.

Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion.

As mentioned previously, the depth of the groundwater identified by the geotechnical investigation is between 16.5 to 25 feet below ground surface. The City of Los Angeles does not classify the Project Site as part of a potentially liquefiable area²⁹ or as a liquefaction zone as classified by the State of California.³⁰ The Seismic Hazards Map of the State of California does not classify the Project Site as within a liquefiable area.

Development of the Project would not exacerbate existing conditions that would cause people or structures to be exposed to strong seismic ground shaking.³¹ Thus, not all three conditions are met (i.e., shallow groundwater, sandy soils, and strong ground motion) that could cause liquefaction. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions that could cause seismic-related ground failure, including liquefaction. As such, impacts associated with liquefaction would be less than significant, and no mitigation measures are required.

iv. Landslides?

No Impact. A significant impact would occur if the proposed project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. Landslides generally occur in loosely consolidated, wet soil, and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. There is no elevation difference across the Project Site.³²

The Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area, or a landslide area, as mapped by City of Los Angeles.³³ In addition, the Project would not substantially alter the existing topography of the Project Site. Specifically, the Project does not propose creating any steep slopes, and, as such, the Project Site would remain flat.

Therefore, the Project would not exacerbate existing conditions that would result in landslides. Accordingly, no impact would occur and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. Construction of the proposed project

29 Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 11, 2020.

30 Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed March 11, 2020.

31 Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed March 11, 2020.

32 Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed March 11, 2020.

33 Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 11, 2020.

would result in ground surface disturbance during site. The Project Site is currently developed with an commercial/warehouse building and associated parking. As such, there are no open spaces with exposed topsoil. The extent of grading and excavation would be limited as the project will consist of 1,506 cubic yards of export.

Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills.

The Project would be required to comply with the City's Low Impact Development (LID) Ordinance and implement best management practices (BMPs), as well as standard erosion controls to limit stormwater runoff, which can contribute to erosion. Additionally, proper grading practices during construction must be adhered to in accordance with City regulations and the associated Soils Report Approval Letter (log # 111800) dated February 6, 2020. Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be fully developed, except for typical landscaping, which would include ground cover and trees to prevent soil erosion.

Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact would occur if any unstable geological conditions would result in any type of geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse. No large scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general project vicinity. Therefore, the Project Site is not located on a geologic unit or soil that is unstable.

As discussed in **Appendix C**, seven exploratory excavation varying in depth from 20 to 60 feet, revealed both high groundwater levels and uncertified fills which is generally not suitable for support of the proposed foundations associated with development of the Project. The deepest uncertified fill is found on the southern and eastern portions of the Project Site. The shallowest uncertified fill is along the northwestern portion of the Project Site. To minimize the amount of removal and recompaction of lateral piles needed to support structures, the proposed 2-story building would be located on the northwestern portion of the Project Site. The recreational and surface parking areas would be located in the remaining areas where the uncertified fill is deeper and do not require the foundational support. Additionally, proper grading practices during construction must be adhered to in accordance with City regulations and the associated Soils Report Approval Letter (log # 111800) dated February 6, 2020.

The Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. As such, the Project would not exacerbate existing conditions, such as unstable geologic units or unstable soil. In addition, as discussed above, based on the depth to groundwater, liquefaction is unlikely at the Project Site.

Furthermore, there is no evidence of natural or manmade voids or low density soils that could lead to ground subsidence or collapse. As such, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact would occur if the proposed project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The existing site soils encountered during this investigation are considered to have a very low to moderate expansive potential.³⁴

In addition, the Project Site and immediate vicinity are fully developed, so no soil would be exposed to water and swell. The Project does not propose to expose the underlying soils permanently or inject soils with water that could cause it to swell. Therefore, the Project would not exacerbate any existing environmental conditions that could create substantial risk to life or property due to expansive soil. Through standard construction practices involving excavation activities and the associated removal of underlying soils (which have a very low to moderate expansive potential), as well as the subsequent use of engineered soils, any potential effects associated with expansive soils would be addressed.

Furthermore, the Project would comply with the LABC, and all on-site grading and site preparation would comply with the applicable provisions of the LAMC Chapter IX, Division 70, which addresses grading, excavation, and fills. As such, impacts related to expansive soils would be less than significant, and no mitigation measures are required.

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

No Impact. A project would cause a significant impact if adequate wastewater disposal is not available. The Project Site is located within a community served by existing wastewater infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. The Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems, and no mitigation measures are required.

³⁴ Geotechnologies, Inc., Final Geotechnical Engineering Investigation, January 15, 2020.

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

Less Than Significant Impact. A significant impact would occur if excavation or construction activities associated with the proposed project would disturb paleontological or unique geological features. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms since the majority of species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to prior grading and development. Therefore, surficial paleontological resources that may have existed at one time have likely been previously disturbed. As discussed previously, grading depth would be limited within the Project Site in order to develop the Project. Nonetheless, the possibility exists that paleontological artifacts that were not recovered during prior construction or other human activity may be present. Pursuant to the California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, in the event that any prehistoric 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, 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.

Therefore, with compliance with the California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, the Project's impact on paleontological resources would be less than significant, and no mitigation measures are required.

VIII. GREENHOUSE GAS EMISSIONS

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Greenhouse gas (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.

There are no federal, State, or local adopted quantitative thresholds of significance for addressing a project's GHG emissions. In 2008 a SCAQMD staff working group discussed interim CEQA GHG significance thresholds. The SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects such the proposed Project. When no quantitative significance thresholds have been formally adopted by a lead agency, the California Air Pollution Control Officers Association suggests making significance determinations on a case-by-case basis. 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 or State agency.

Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of GHG emissions resulting from the Project; (2) a qualitative analysis or performance-based standards; (3) a quantification of the extent to which the Project increases GHG emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The City has adopted the Green New Deal to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. In order to implement the 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 (LAGBC) (Ordinance No. 179,890). As the LAGBC includes applicable provisions of the State's CALGreen Code, a new project that can demonstrate it complies with the LAGBC is considered consistent with Statewide GHG reduction goals and policies including AB32 (California Global Warming Solutions Act of 2006). Through required implementation of the LAGBC, the proposed Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact would occur if the proposed project conflicted with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases (GHG). AB 32, the California Global Warming Solutions Act of 2006, focuses on reducing GHG emissions in California.³⁵ GHGs, as defined under AB 32, include carbon dioxide (CO₂), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In November 2017, CARB adopted an updated Climate Change Scoping Plan, which details strategies to meet that goal. The Climate Change Scoping Plan³⁶ also recommends energy-efficiency measures in buildings such as maximizing the use of energy efficient appliances and solar water heating, as well as complying with green building standards that result in decreased energy consumption compared to Title 24 building codes.³⁷ In addition, the Climate Change Scoping Plan encourages the use of solar photovoltaic panels and other renewable sources of energy to provide clean energy and reduce fossil fuel-based energy.

The proposed Project would be designed in accordance with the 2016 Title 24 Energy Efficiency Standards, which represent an approximate improvement of 30 percent beyond the 2008 Standards that were used in assumptions for the City's 2013 CAP GHG analysis. Conformance with the 2016 Standards is consistent with the City's objectives to reduce GHG emissions to meet regional and Statewide emission reduction targets. Therefore, the proposed Project does not interfere with the State's implementation of (i) Executive Order B-30-15 and Senate Bill 32's target of reducing Statewide GHG emissions to 40 percent below 1990 levels by 2030 or (ii) Executive Order S-3-05's target of reducing Statewide GHG emissions to 80 percent below 1990 levels by 2050 because it does not interfere with the State's implementation of GHG reduction plans described in the CARB's updated Scoping Plan.

The Project would be designed in accordance with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards, CALGreen standards,

35 California Air Resources Board (CARB), "Assembly Bill 32 Overview" (last reviewed August 4, 2014), accessed August 2019, <http://www.arb.ca.gov/cc/ab32/ab32.htm>.

36 CARB, "AB 32 Scoping Plan" (last reviewed January 8, 2019), accessed August 2019, <http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>.

37 California Building Standards Commission, "California Building Standards Code."

and City of Los Angeles Green Building Code. The primary measure of whether a project would have an impact on GHG emissions is whether it would conflict with applicable regulatory plans and policies intended to reduce GHG emissions; in this case, specifically the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). Key policies of SCAG's 2016 RTP/SCS include improving access and mobility and encouraging efficient transportation infrastructure and pedestrian improvements. The Project would demolish the existing uses to accommodate a school and would not result in a substantial increase in population within the City. Therefore, the proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant and no mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

Less Than Significant Impact. A significant impact would occur if the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The types and amounts of hazardous materials to be used for the Project would be typical of those used during construction activities and those typically used in the operation of eldercare facilities, as discussed in the following analysis.

Construction

The Project would not involve the routine transport of hazardous materials to and from the Project Site during construction. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, existing regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would comply with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction, and development of the Project on the Project Site would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures are required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Operation of the Project could also involve the routine use of potentially hazardous materials typical of those used in a small medical facility, including biohazards waste and cleaning agents. As with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, State and local requirements. Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact would occur if the proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials.

Methane

The Project Site is located in a Methane Zone.³⁸ These areas have a risk of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems. The City requires the following for projects located within a Methane Zone: prior to the issuance of a building permit, the Applicant will be required to have the Project Site to be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC. As a matter of regulatory compliance, the engineer will be required to measure subsurface soil gas concentrations and pressures of methane at the Project Site and investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level, which will prevent potential methane gas seepage into the building.³⁹ The Applicant will be required to implement the engineer's design recommendations subject to the California Division of Oil, Gas, and Geothermal Resources (DOGGR), LADBS and LAFD plan review and approval. Construction workers would be protected from methane exposure through compliance requirements regulated by Cal/OSHA.

Asbestos

Due to the age of the building on the Project Site, there is a potential that ACMs are present. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The Project would be required to comply with SCAQMD Rule 1403 to ensure proper removal of ACMs during demolition activities.⁴⁰ Disturbance of any ACM would be handled in accordance with applicable local and State regulations, which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529.

Lead

Due to the age of the building on the Project Site, there is a potential that LBP is present. Cal/OSHA regulations require that specific work practices be implemented when handling construction materials and debris that contain lead-containing materials. Construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 Code of Federal Regulations (CFR) 1910.1025 and 1926.62. Local and State regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. Regulations that would be followed

38 ZIMAS search: <http://zimas.lacity.org/>.

39 LADBS, Methane Mitigation Standards: <https://www.ladbs.org/services/core-services/plan-check-permit/methane-mitigationstandards>, accessed March 11, 2020.

40 SCAQMD Rule 1403: <http://www.aqmd.gov/home/rules-compliance/compliance/asbestos-demolition-removal>, accessed March 11, 2020.

during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by HUD.⁴¹

Polychlorinated Biphenyl

Polychlorinated biphenyls (PCBs) were historically used as coolants and lubricants in transformers, capacitors, and other electrical equipment beginning in 1929 because they do not burn easily and serve as a good insulating material. Although the DTSC is a lead regulatory agency for site cleanups in California, engagement with the U.S. EPA is required when addressing PCB-contaminated sites. Since Toxic Substances Control Act (TSCA) PCB regulations are not delegated, U.S. EPA is the regulatory lead for the cleanup of PCBs under the TSCA PCB cleanup requirements in 40 CFR 761. Due to the age of the on-site structures, there is the potential that fluorescent light ballasts in fixtures contain PCBs. The ballasts do not represent a recognized environmental concern but should be handled in accordance with 40 CFR 761 upon demolition or renovation.

Underground Storage Tanks (UST)

Compliance with the following regulations will ensure the safe removal of any potential USTs: Los Angeles Fire Code, Division 5 and 31⁴²; California Health & Safety Code, Division 20, Chapter 6.7⁴³; CCR, Title 23, Division 3, Chapter 1654; and LAMC Article 7 of Chapter V, Section 120, 2301 and 5003.

There are 20 listings that are known sources of contamination indicated to be within the critical 1/4-mile radius of the Project Site. All 20 Leaking USTs (LUST) have been closed and no known sources of contamination are currently open at this time.⁴⁴

All of the other sites are beyond 1/4 mile away and nearly all have been remediated and closed. The nearest active case is 0.5 miles to the north (657 North Vermont Avenue) and under remediation.⁴⁵ All of these sites appear too distant and lack adequate significance to present a realistic risk of impairment to the Project Site.

Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. Schools located within a one-quarter mile radius from the Project Site include the following:

41 Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing: https://www.hud.gov/program_offices/healthy_homes/lbp/hudguidelines, accessed March 11, 2020.

42 LAFD UST Tank Abandonment Guidelines: <https://www.lafd.org/fire-prevention/cupa/ust-tank-abandonment-guidelines> accessed March 11, 2020.

43 Underground Storage of Hazardous Substances: https://www.waterboards.ca.gov/ust/regulatory/docs/hs6_7.pdf accessed March 11, 2020.

44 Geotracker: <https://geotracker.waterboards.ca.gov/>, accessed March 11, 2020.

45 Geotracker: <https://geotracker.waterboards.ca.gov/>, accessed March 11, 2020.

- Central City Value High School: 221 North Westmoreland Avenue, approximately 50 feet south of the Project Site
- Dr. Sammy Lee Medical and Health Science Magnet Elementary School: 3600 Council Street, approximately 350 feet south of the Project Site
- Virgil Middle School/CWC Silver Lake School: 152 N. Vermont Avenue, approximately 475 feet southwest of the Project Site
- Camino Nuevo High School: 3500 W. Temple Street, approximately 470 feet northeast of the Project Site across North Westmoreland Avenue
- Frank Del Omo Elementary School: 100 N. New Hampshire Avenue, approximately 0.22 miles southwest of the Project site across N. Vermont Avenue.

As discussed above, construction of the Project would involve the use of those hazardous materials that are typically necessary for construction of a mixed-use building containing residential and commercial uses. As such, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. In addition, construction of the Project would involve the demolition of the existing single-story commercial/warehouse building which, due to its age, may contain asbestos and lead-based paints and materials. The removal of any asbestos-containing materials would be required to comply with all applicable existing rules and regulations, including SCAQMD Rule 1403 (Asbestos Demolition and Renovation Activities) and Cal/OSHA regulations regarding lead-based paint. Thus, construction activities associated with the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, including the Central City Value High School. As such, impacts would be less than significant and no mitigation measures are required.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. A significant impact would occur if the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would create a significant hazard to the public or the environment. California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. While California Government Code Section 65962.5 makes reference to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the California Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. Based on a review of these databases, the Project site is not located on a list of hazardous material sites compiled pursuant to Section 65962.5. Additionally, the Project Site is not included on any State hazardous site list and would not pose an environmental hazard to people on the

Project Site or to surrounding sensitive uses.⁴⁶ As such, the Project would not exacerbate existing conditions. Impacts would be less than significant, and no mitigation measures are required.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The Project Site is not located within 2 miles of an airport or within an airport planning area. The nearest airport is the Los Angeles International Airport (LAX) located approximately 11 miles southwest of the Project Site. Given the distance between the Project Site and LAX, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise. Therefore, no impact would occur and no mitigation measures are required.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. According to the Safety Element of the City of Los Angeles General Plan and County of Los Angeles Department of Public Works, the nearest designated disaster route to the Project Site is Beverly Boulevard, approximately 183 feet to the north.^{47,48} 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 could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Operation of the Project would generate traffic in the Project vicinity and but would not result in modifications to site access. The Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. The Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan, and, as such, impacts related to the implementation of the City's emergency response plan would be less than significant and no mitigation measures are required.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. A significant impact would occur if the proposed project exposed people and structures to high risk of wildfire. The Project Site is located in an urbanized area without wildlands in its vicinity. The Project Site is not located within a City-designated Very High Fire Hazard

46 State of California, Department of Toxic Substances Control, EnviroStor, "Hazardous Waste and Substances Site List," accessed November 2019, <https://www.envirostor.dtsc.ca.gov/>.

47 Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

48 County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, August 2008.

Severity Zone⁴⁹ or a City-designated fire buffer zone.⁵⁰ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In addition, the proposed residential, educational, and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impact would occur and no mitigation measures are required.

49 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports.

50 City of Los Angeles General Plan Safety Element, November 1996, Exhibit D, Selected Wildfire Hazard Areas, p. 53.

X. HYDROLOGY AND WATER QUALITY

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| i. Result in substantial erosion or siltation on- or off-site; | | | | |
| ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; | | | | |
| iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | | | | |
| iv. Impede or redirect flood flows? | | | | |
| d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems, or does not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

Construction

During Project 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 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 implement a Stormwater Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ). The SWPPP would set forth Best Management Practices (BMPs) for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

Based on the depth to groundwater identified by the geotechnical investigation (16.5 to 25 feet below ground surface), the Project's maximum proposed excavation would be limited to demolition of the existing one-story warehouse. Even if seasonal or perched groundwater is encountered during excavation, a temporary dewatering system, such as pumping or well points, would be implemented in accordance with NPDES permit requirements. Prior to the issuance of a grading permit, the Project Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the State Water Resources Control Board to comply with the NPDES Construction General Permit. With compliance with these existing regulatory requirements, impacts to water quality and waste discharge requirements during construction would be less than significant, and no mitigation measures would be required.

Operation

Operation of the Project would introduce sources of potential water pollution that are typical of commercial developments, including studio uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could also potentially carry urban pollutants into municipal storm drains.

However, in accordance with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), best management practices (BMPs) would be implemented on-site to address City and State water quality requirements. The Project would not violate any water quality standards or waste discharge requirements through compliance with these regulatory requirements for stormwater and non-stormwater discharges; i.e., implementation of LID standards and best management practices. Therefore, impacts to surface water quality would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact would occur if the proposed project would substantially deplete groundwater or interferes with groundwater recharge. Implementation of the proposed Project would not result in a substantial change in the amount of pervious and impervious surface across the Project Site nor would it impede sustainable groundwater management of the basin. Groundwater was identified at 16.5 to 25 feet below ground surface. Dewatering during construction or operation is not anticipated. Similar to existing conditions, redevelopment of the Project Site would result in a negligible amount of on-site groundwater recharge opportunities and would not impact groundwater wells, change the rate or direction of flow of groundwater, impact groundwater recharge areas, or impede sustainable groundwater management of the basin. As explained above, the excavations and grading activities would be limited, therefore excavation activities are not likely to interfere with the groundwater table. As such, impacts would be less than significant and no mitigation measures are required.

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

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

Less Than Significant Impact. A significant impact would occur if the proposed project would substantially alter the drainage pattern of an existing stream or river such that flooding would result. The Project Site is located in a highly urbanized area. There are no natural watercourses on the Project Site or in the vicinity. As discussed above, the Project is developed with paved surfaces, and current stormwater runoff flows to the local storm drain system. Additionally, the LID will improve the drainage pattern with less runoff leaving the Project Site. As such, the proposed Project would not result in a substantial alteration to the existing drainage pattern or to any drainage course; no erosion or siltation impacts related to such alteration would occur. Impacts would be less than significant, and no mitigation measures are required.

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. A significant impact would occur if the proposed project would substantially alter the drainage pattern of an existing stream or river such that flooding would result. There are no streams or rivers within or immediately surrounding the Project Site. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns of the site and reduce off-site flows. However, construction and operation of the proposed Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on or off site with implementation of the LID program. As such, impacts would be less than significant and no mitigation measures are required.

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 would occur if runoff water would exceed the capacity of existing or planned storm drain systems serving the project site, or if the proposed project would substantially. The City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) contain requirements for construction activities and operation of development and redevelopment projects to integrate low impact development practices and standards for stormwater and other related requirements in the City's Development BMPs Handbook. Such regulations and practices are designed in consideration of existing and planned stormwater drainage systems. Conformance would be ensured during the permitting process with the Department of Building & Safety and impacts would remain less than significant and no mitigation measures are required.

iv. Impede or redirect flood flows?

No Impact. A significant impact would occur if the proposed project would be located within a 100-year or 500-year floodplain or would impede or redirect flood flows. The Project Site is not located within a 100-year or 500-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.^{51,52} Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required.

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

No Impact. A significant impact would occur if the proposed project would be located within an area susceptible to inundation by seiche, tsunami, or mudflow. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency

51 Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C 1595F, effective September 26, 2008.

52 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

Management Agency (FEMA) or by the City of Los Angeles.^{53,54} In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin or within a potential inundation area.⁵⁵ The Project Site is located approximately six miles east of the Pacific Ocean, and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.⁵⁶ Therefore, no tsunami or tsunami events would be expected to impact the Project Site. No impacts would occur, and no mitigation measures would be required.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. The proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The proposed 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 having adequate capacity in the Project vicinity.

Potential pollutants generated by the Project would be typical of land uses within the Project vicinity and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans. The increase in pervious areas would improve the groundwater recharge capacity of the Project Site over existing conditions. Since the Project's LID BMP design is for biofiltration, treated runoff would be discharged into the storm drain system, away from the structures and groundwater table.

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be required.

53 Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C 1595F, effective September 26, 2008.

54 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

55 Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

56 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

XI. LAND USE AND PLANNING

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Physically divide an established community?

Less Than Significant Impact. A significant impact would occur if the proposed project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. The Project Site is currently developed with a single-story commercial/warehouse building and associated parking. The Project Site is located in a highly urbanized area characterized by low- to mid-rise buildings occupied by commercial/retail uses, offices, and multi-family residences. There is no existing residential use on the Project Site or a residential use that would be physically separated or otherwise disrupted by the Project because the proposed development would remain within the boundary of the existing Project Site. There are no vacant or undeveloped areas around the Project Site, such that development of the Project could possibly divide an established community or result in a separation of uses or disruption of access between land uses around the Project Site. Implementation of the Project would result in further infill of an already developed community and on a site that is already built out with a single-story commercial/warehouse building. The Project would not disrupt, divide, or isolate an existing neighborhood or community directly or indirectly, as all proposed improvements would occur within the limits of the Project Site. Lastly, the Project does not propose a freeway or other large infrastructure or barrier that would divide a community. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Therefore, the impact would be less than significant.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Project Site is located within the adopted Wilshire Community Plan area. The Community Plan designates the subject property with a land use designation of Limited Industrial, with corresponding zones of CM, MR1, M1, and P. The existing zoning for the Project

Site is M1-1 with a General Plan land use designation of Limited Industrial within the Vermont/Western Station Neighborhood Area Plan (SNAP) area, Subarea D.

The Project proposes to replace the existing commercial/warehouse use with a public transitional kindergarten to 8th grade charter school. The Project Site is surrounded by M1-1 zoned parcels of varying types of uses. North of the Project Site along Beverly Boulevard, are a variety of commercial and retail uses. South of the Project Site, across Cosmopolitan Street, is the Central City Value High School, designated Subarea D Light Commercial/warehouse in the SNAP Specific Plan Area. The Central City Value High School operates by the Applicant pursuant to an approved Specific Plan Exception approved by the City on December 27, 2004, for a charter high school of 480 students in the M1-1 Zone.⁵⁷ The M1-1 zone limits the Floor Area Ratio (FAR) to a maximum of 1.5 to 1. The Project proposes a total floor area of 24,360 square feet, resulting in a FAR of 0.46 to 1, below the FAR limit for M1-1 zones.

The Project Site is located within BOE Special Grading Area. As the export of soil would exceed 1,000 cubic yards during construction, the Applicant would be requesting a haul route application for the export of 1,506 cubic yards of soil.

The layout of the school campus is driven by existing soil conditions that are not suitable for support of the proposed foundations, floor slabs or additional fill. As discussed in **Appendix C.1**, the proposed 2-story school building is located at the northwestern portion where the shallowest uncertified fill has been found. This is to minimize the amount of removal and recompaction or lateral piles that would be required. Additionally, recreational and surface parking areas are proposed in the remaining areas where the uncertified fill is deeper and do not require foundational support. The Applicant requests a Specific Plan Exception from Section 10.B of the Vermont/Western SNAP to allow less than 75 percent of the ground floor exterior wall along the building frontage to be located more than 10 feet from any lot line parallel to a public street. Additionally, the Applicant requests to allow the surface parking lot to not be placed in the rear of the building and to be located within 20 feet of a public street. Without these exceptions, the building would result in a narrow U-Shaped school along the three street frontages that would be located in the deepest areas of uncertified fill, inconsistent with the general purpose and intent of the SNAP to provide an appropriate cohesive environment for students.

However, the proposed Project conforms with the SNAP by developing a charter school that would primarily service students within and immediately surrounding the SNAP area. In addition, the proposed Project would conform with the goals identified in the Wilshire Community Plan by developing a public charter school on an underutilized site within the vicinity of residential neighborhoods and proximate public transit option including the Vermont/Beverly Metro station located 900 feet from the Project Site. Other policies include: Policy 6-4.1, recognize the ability of charter schools to effectively provide classroom space in impacted urban areas and Policy 6-4.3, support the construction of charter schools as being desirable to public convenience and welfare. As such, the Project would not 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

⁵⁷ ZIMAS, Case No. APCC-2004-1841-SPE-SPP.

environmental effect. Impacts would be less than significant, and no mitigation measures are required.

XII. MINERAL RESOURCES

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

No Impact. A significant impact would occur if the proposed project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. The Project Site is located in a highly urbanized portion of the City and is not used for mineral resource extraction. No State-designated or locally designated mineral resource zones exist in the City. According to the Conservation Element of the City of Los Angeles General Plan, Mineral Resources, Exhibit A, the Project Site is not classified by the City as containing significant mineral deposits nor is it designated for mineral extraction land use. Thus, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of local importance or value to the region or to the residents of the State. No impact would occur and no mitigation measures are required.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact would occur if the proposed project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{58,59,60} The Project Site is also not located within a City-designated oil

58 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

59 State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

60 City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

field or oil drilling area.^{61,62} Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required.

61 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.

62 California Division of Oil, Gas and Geothermal Resources, 2017, Online Well Finder, <http://maps.conservation.ca.gov/doggr/#close>, accessed March 10, 2020.

XIII. NOISE

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project result in: | | | | |
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The following section summarizes and incorporates by reference information from the *Noise Study* prepared by Meridian Consultants on behalf of the Applicant. The Noise Study is included as **Appendix D** of this ND.

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. A significant impact would occur if exposure of persons to or generation of noise levels are in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

On-Site Construction Noise

Construction activities that would occur during the construction phases (demolition, site preparation, building construction, architectural coating, and paving) would generate both steady-state and episodic noise that would be heard both on and off the Project Site.

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on-site would operate simultaneously. This activity would

take place approximately 50 feet from the Central City Value High School located approximately 32 feet to the south. The maximum noise level at the Central City Value High School and Virgil Middle School/CWC Silver Lake Middle School from construction activity at the Project Site are shown in **Table 4.8: Construction Maximum Noise Estimates**.

TABLE 4.8
CONSTRUCTION MAXIMUM NOISE ESTIMATES

| Use | Distance from Project Site (feet) | Construction Noise (Leq) | Ambient Noise Leq (dBA) | Significance Threshold | Maximum Noise Increase over Significance Threshold |
|--|-----------------------------------|--------------------------|-------------------------|------------------------|--|
| Central City Value High School | 33 | 90.3 | 59.9 | 64.9 | +25.4 |
| Virgil Middle School/CWC Silver Lake Middle School | 475 | 67.2 | 59.9 | 64.9 | +3.0 |

Source: FHWA, RCNM, version. 1.1.

*Refer to **Appendix D** for Construction Noise Worksheets*

Construction equipment operates at its noisiest levels for certain percentages of time during operation. Equipment such as excavators, graders, and loaders would operate at different percentages over the course of an hour.⁶³ During a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently. The Project's estimated construction noise levels were calculated for a scenario in which a reasonable number of construction equipment was assumed to be operating simultaneously, given the physical size of the site and logistical limitations, and with the noise equipment located at the construction area nearest to the affected receptors, to present a conservative impact analysis. This is considered a worst-case evaluation because the Project would typically use fewer overall equipment simultaneously at any given time and, as such, would likely generate lower noise levels than reported herein.

Pursuant to Section 41.40 of the LAMC, construction would be limited to the hours between 7:00 AM and 9:00 PM, Monday through Friday, and between 8:00 AM and 6:00 PM on Saturday. No construction activities would occur on Sundays or federal holidays. All construction related noise would be required to comply with the provisions of Section 112.05 of the LAMC. Pursuant to Section 112.05, the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet from the source of the noise between the hours of 7:00 AM to 10:00 PM when the source is located within 500 feet of a residential zone is prohibited. Compliance with Section 112.05 of the LAMC includes the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques. Other noise-reduction techniques include a construction management plan which specifies that all construction equipment, fixed or mobile, will be equipped with properly operating and maintained mufflers and other State-required noise attenuation devices; identify the maximum distance between construction equipment staging areas and occupied residential areas; and require the

⁶³ Federal Highway Administration, Traffic Noise Model (2006).

use of electric air compressors and similar power tools. Optimal muffler systems for all equipment and the break in line of sight to a sensitive receptor would reduce construction noise levels by approximately 10 dB or more.⁶⁴ In addition, modifications such as dampening of metal surfaces or the redesign of a particular piece of equipment can achieve noise reduction of up to 5 dBA.⁶⁵ Limiting the number of noise-generating heavy-duty off-road construction equipment simultaneously used on the Project Site within 50 feet of off-site noise sensitive receptors surrounding the site to no more than one or two pieces of heavy-duty off-road equipment would further reduce construction noise levels by approximately 10 dBA. Temporary abatement techniques include the use of temporary and/or movable shielding for both specific and nonspecific operations. An example of such a barrier utilizes noise curtains in conjunction with trailers to create an easily movable, temporary noise barrier system. A noise barrier can achieve a 5-dB noise level reduction when it is tall enough to break the line-of-sight to the receiver. After it breaks the line-of-sight, it can achieve approximately 1.5 dB of additional noise level reduction for each one (1) meter (3.3 feet) of barrier height.⁶⁶

A sign will be posted at the Project construction site, legible at a distance of 50 feet, with a contact name, telephone number, and dates and duration of construction activities, so that residents can inquire about the construction process and register complaints. In conjunction with this required posting, a noise disturbance coordinator will be identified to address construction noise concerns received. The contact name and the telephone number for the noise disturbance coordinator will be posted on the sign. The coordinator will be responsible for responding to any local complaints about construction noise and will notify the City to determine the cause and implement reasonable measures to the complaint, as deemed acceptable by the City. The Project would comply with the City's Noise Ordinance as it relates to construction equipment by limiting activities to occur between 7:00 AM to 9:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on Saturday. Compliance with the City's Noise Ordinance, construction noise levels would be reduced by a minimum of 30 dBA and noise levels would be within the normally and conditionally acceptable levels. As such, on-site construction noise impacts would be less than significant and no mitigation measures are required.

Off-Site Construction Noise

Construction of the Project would require workers travelling to and from the Project Site. At the maximum, approximately 18 worker trips per day, 7 vendor trips per day, and 900 total hauling trips during construction. Noise associated with construction truck trips were estimated using the Caltrans FHWA Traffic Noise Model based on the maximum number of truck trips in a day. Construction haul trips would generate noise levels of approximately 60 dBA, measured at a distance of 25 feet from N. Westmoreland Avenue. As described in **Appendix D**, existing noise levels along N. Westmoreland Avenue ranged were 62.8 dBA. The noise level increases from

64 FHWA, Special Report – Measurement, Prediction, and Mitigation, updated June 2017, accessed August 2019, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.

65 FHWA, *Special Report—Measurement, Prediction, and Mitigation*, updated June 2017, accessed July 2019, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.

66 FHWA, *Noise Barrier Design – Visual Quality*, accessed April 2019, https://www.fhwa.dot.gov/Environment/noise/noise_barriers/design_construction/keepdown.cfm.

truck trips would be below the significance threshold of 5 dBA. As such, off-site construction noise impacts would be less than significant and no mitigation measures are required.

Operation

Table 4.9: Existing plus Project, shows the change in CNEL from existing traffic volumes and from traffic generated by the Project. As shown in **Table 4.9**, the maximum roadway noise level increase along existing roadways would be 1.5 dBA CNEL along N. Westmoreland Avenue north of W. 1st Street (Intersection 4) during the morning (AM) and afternoon (PM) peak hour. Roadway noise levels would not increase by 3 dBA CNEL or more and therefore, impacts related to roadway noise would not be considered significant.

Table 4.10: Future plus Project, shows the change in CNEL from future traffic volumes and from traffic generated by the Project. As shown in **Table 4.10**, the maximum roadway noise level increase along existing roadways would be 1.5 dBA CNEL along N. Westmoreland Avenue north of W. 1st Street (Intersection 4) during the morning (AM) and afternoon (PM) peak hour. Roadway noise levels would not increase by 3 dBA CNEL or more and therefore, impacts related to roadway noise would be less than significant.

TABLE 4.9
EXISTING PLUS PROJECT

| | | | Existing | Existing plus Project | Difference |
|-------------------|--------------------------------|-------------|----------|-----------------------|------------|
| Intersection | Roadway Segment | Time Period | dBA CNEL | | |
| Beverly Boulevard | | | | | |
| 1 | East of Madison Avenue | AM | 63.1 | 63.1 | 0.0 |
| | | PM | 62.9 | 62.9 | 0.0 |
| | West of Madison Avenue | AM | 63.1 | 63.2 | +0.1 |
| | | PM | 62.9 | 62.9 | 0.0 |
| 2 | East of N. Westmoreland Avenue | AM | 60.7 | 61.0 | +0.3 |
| | | PM | 61.2 | 61.2 | 0.0 |
| | West of N. Westmoreland Avenue | AM | 62.4 | 62.4 | 0.0 |
| | | PM | 62.0 | 62.2 | +0.2 |
| W. 1st Street | | | | | |
| 3 | East of Vermont Avenue | AM | 57.0 | 57.5 | +0.5 |
| | | PM | 60.8 | 61.1 | +0.3 |
| | West of Vermont Avenue | AM | 56.3 | 56.3 | 0.0 |
| | | PM | 61.2 | 61.2 | 0.0 |
| 4 | East of N. Westmoreland Avenue | AM | 56.1 | 56.6 | +0.5 |
| | | PM | 56.3 | 56.5 | +0.2 |
| | West of N. Westmoreland Avenue | AM | 56.9 | 57.4 | +0.5 |
| | | PM | 57.1 | 57.4 | +0.3 |

| | | | Existing | Existing plus Project | Difference |
|------------------------|----------------------------|-------------|----------|-----------------------|------------|
| Intersection | Roadway Segment | Time Period | dBA CNEL | | |
| Madison Avenue | | | | | |
| 1 | North of Beverly Boulevard | AM | 41.4 | 41.4 | 0.0 |
| | | PM | 39.0 | 39.0 | 0.0 |
| | South of Beverly Boulevard | AM | 43.9 | 44.7 | +0.8 |
| | | PM | 42.3 | 43.1 | +0.8 |
| N. Westmoreland Avenue | | | | | |
| 2 | North of Beverly Boulevard | AM | 42.8 | 40.3 | -2.5 |
| | | PM | 42.5 | 42.5 | 0.0 |
| | South of Beverly Boulevard | AM | 52.2 | 50.4 | -1.8 |
| | | PM | 50.9 | 51.4 | +0.5 |
| 4 | North of W. 1st Street | AM | 50.2 | 51.7 | +1.5 |
| | | PM | 47.9 | 49.4 | +1.5 |
| | South of W. 1st Street | AM | 41.3 | 41.3 | 0.0 |
| | | PM | 41.7 | 42.6 | +0.9 |
| N. Vermont Avenue | | | | | |
| 3 | North of W. 1st Street | AM | 63.6 | 63.6 | 0.0 |
| | | PM | 63.4 | 63.4 | 0.0 |
| | South of W. 1st Street | AM | 63.1 | 63.4 | +0.3 |
| | | PM | 63.0 | 63.1 | +0.1 |

Source: Refer to **Appendix D** for roadway noise worksheets.

TABLE 4.8
FUTURE PLUS PROJECT

| | | | Future | Future plus Project | Difference |
|-------------------|--------------------------------|-------------|----------|---------------------|------------|
| Intersection | Roadway Segment | Time Period | dBA CNEL | | |
| Beverly Boulevard | | | | | |
| 1 | East of Madison Avenue | AM | 63.2 | 63.3 | +0.1 |
| | | PM | 63.0 | 63.1 | +0.1 |
| | West of Madison Avenue | AM | 63.3 | 63.3 | 0.0 |
| | | PM | 63.0 | 63.0 | 0.0 |
| 2 | East of N. Westmoreland Avenue | AM | 60.9 | 60.9 | 0.0 |
| | | PM | 61.3 | 61.3 | 0.0 |
| | West of N. Westmoreland Avenue | AM | 62.6 | 62.7 | +0.1 |
| | | PM | 62.3 | 62.4 | +0.1 |

| Intersection | Roadway Segment | Time Period | Future | Future plus Project | Difference |
|------------------------|-----------------------------|-------------|----------|---------------------|------------|
| | | | dBA CNEL | | |
| W. 1st Street | | | | | |
| 3 | East of Vermont Avenue | AM | 57.2 | 57.7 | +0.5 |
| | | PM | 61.1 | 61.3 | +0.2 |
| | West of Vermont Avenue | AM | 56.5 | 56.5 | 0.0 |
| | | PM | 61.4 | 61.4 | 0.0 |
| 4 | East of Westmoreland Avenue | AM | 56.4 | 56.8 | +0.4 |
| | | PM | 56.6 | 56.8 | +0.2 |
| | West of Westmoreland Avenue | AM | 57.2 | 57.6 | +0.4 |
| | | PM | 57.4 | 57.6 | +0.2 |
| Madison Avenue | | | | | |
| 1 | North of Beverly Boulevard | AM | 41.5 | 41.5 | 0.0 |
| | | PM | 39.0 | 39.0 | 0.0 |
| | South of Beverly Boulevard | AM | 44.0 | 44.8 | +0.8 |
| | | PM | 42.4 | 43.2 | +0.8 |
| N. Westmoreland Avenue | | | | | |
| 2 | North of Beverly Boulevard | AM | 42.9 | 42.9 | 0.0 |
| | | PM | 42.6 | 42.6 | 0.0 |
| | South of Beverly Boulevard | AM | 52.3 | 52.4 | +0.1 |
| | | PM | 51.4 | 51.4 | 0.0 |
| 4 | North of W. 1st Street | AM | 50.3 | 51.8 | +1.5 |
| | | PM | 48.0 | 49.3 | +1.3 |
| | South of W. 1st Street | AM | 41.3 | 41.3 | 0.0 |
| | | PM | 41.7 | 41.7 | 0.0 |
| N. Vermont Avenue | | | | | |
| 3 | North of W. 1st Street | AM | 63.8 | 63.8 | 0.0 |
| | | PM | 63.5 | 63.5 | 0.0 |
| | South of W. 1st Street | AM | 63.3 | 63.5 | +0.2 |
| | | PM | 63.1 | 63.2 | +0.1 |

Source: Refer to **Appendix D** for roadway noise worksheets.

Student Activity

Sources of noise emanate from the Project Site within the open gathering and walkway areas during breaks between classes and during lunchtime, and from the surface parking areas. The school campus includes a soccer field, basketball court and planting garden, and turf play area at the eastern portion of the site. The play structure is north of the planting garden.

Noise from students would be similar in the general activities that occur at the Central City Value High School. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity, similar to the current conditions at the surface parking lot. Therefore, operational noise impacts related to student noise and activity would be less than significant and no mitigation measures are required.

Fixed Mechanical Equipment

The Project would introduce various stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. All project mechanical equipment would be required to be designed with appropriate noise-control devices, such as sound attenuators, acoustics louvers, or sound screens/parapet walls, to comply with noise-limitation requirements provided in LAMC Section 112.02, which prohibits the noise from such equipment from causing an increase in the ambient noise level of more than 5 dBA. Therefore, operation of mechanical equipment on the Project building would not exceed the City's threshold of significance.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

The City has not adopted a significance threshold to assess vibration impacts during construction. Thus, the Caltrans *Transportation and Construction Vibration Guidance Manual*⁶⁷ is used as a screening tool to assess the potential for adverse vibration effects related to structural damage. The Project would have a significant impact to vibration if it would exceed the following thresholds:

- **Potential Building Damage.** Project construction activities cause ground-borne vibration levels to exceed 0.5 ips PPV at the nearest off-site residential buildings.

Ground-borne vibration impacts were evaluated by identifying potential vibration sources estimating the distance between vibration sources, vibration sensitive receptors, and surrounding structure locations; and making a significance determination based on the significance thresholds.

Construction activities for the Project have the potential to generate low levels of ground-borne vibration to vibration sensitive uses that include the Central City Value High School to the south. 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.

Table 4.11: Construction Vibration Levels Estimates—Building Damage present construction vibration impacts associated with on-site construction in terms of building damage. As shown in **Table 4.11**, the forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold at the Central City Value High School located adjacent to the south of the Project Site. Therefore, construction vibration impacts would be less than significant and no mitigation measures are required.

TABLE 4.11
CONSTRUCTION VIBRATION LEVELS ESTIMATES—BUILDING DAMAGE

| Nearest Off-Site Building Structures | Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment | | | | | | | Significance Threshold (PPV ips) |
|--|--|------------------|-----------------|------------------|---------------|-------------|-----------------|----------------------------------|
| | Pile Driver (impact) ¹ | Vibratory Roller | Large Bulldozer | Caisson Drilling | Loaded Trucks | Jack-hammer | Small bulldozer | |
| | FTA Reference Vibration Levels at 25 feet | | | | | | | |
| | 0.644 | 0.210 | 0.089 | 0.089 | 0.076 | 0.035 | 0.003 | — |
| Central City Value High School (33 feet) | 0.425 | 0.138 | 0.059 | 0.059 | 0.050 | 0.023 | 0.002 | 0.5 |

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment.

Source: Refer to **Appendix D** for construction vibration worksheets.

Note:

¹ Pile driving would not be required during construction.

⁶⁷ Caltrans, *Transportation and Construction Vibration Guidance Manual* (September 2013), accessed August 2019, http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

c. For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels from a public airport or public use airport. The Project Site is not located within the vicinity of a private airstrip or two miles of a public airport. The nearest airport is the Los Angeles International Airport (LAX) located approximately 11 miles southwest of the Project Site. The Project Site is not within the Airport Influence Area of any of the listed airports.⁶⁸ The Project would not expose residents to excessive noise levels from aircraft. Therefore, no impact would occur, and no mitigation measures are required.

68 Los Angeles County Airport Land Use Commission, Airport Influence Areas, website: https://data.lacounty.gov/Property-Planning/Airport-Influence-Area/dk4z-eiqh?category=Property-Planning&view_name=Airport-Influence-Area, accessed March 11, 2020.

XIV. POPULATION AND HOUSING

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|-------------------------------------|
| 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

Less Than Significant Impact. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude.

SCAG Regional Comprehensive Plan. In October 2008, SCAG approved and adopted the 2008 Regional Comprehensive Plan (RCP) for the SCAG Region—Helping Communities Achieve a Sustainable Future.⁶⁹ The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region's land use, housing, economic, transportation, environmental, and overall quality-of-life needs. The 2008 RCP was intended to serve as an advisory document for local agencies in the SCAG region. The following principles are based on the region's adopted Compass Growth Vision Principles for Sustaining a Livable Region:

- *Improve mobility for all residents.* Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.
- *Foster livability in all communities.* Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.
- *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.

⁶⁹ Southern California Association of Governments, 2008 Regional Comprehensive Plan.

- *Promote sustainability for future generations.* Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

SCAG Regional Transportation Plan Sustainable Communities Strategy. In April 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS).⁷⁰ 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.

According to the growth estimates from SCAG's 2016–2040 RTP/SCS, the City had an estimated employment population of 1,831,457 in 2020 and is projected to have an employment population of 2,169,100 in 2040. The addition of approximately 48 employees would be less than 0.01 percent of SCAG's employment forecast for the City. While the proposed use would provide new employment opportunities, the proposed use is not considered a unique use that would draw substantial new residents to the area to fulfill jobs.

The proposed Project is an urban infill project that conforms to the land use types envisioned by the City's General Plan. As such, it would not result in substantial indirect or induced unplanned population growth. Therefore, impacts would be less than significant and no mitigation measures are required.

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

No Impact. A significant impact would occur if the proposed project would displace a substantial quantity of existing residences or a substantial number of people. The Project would develop a new school on a site that is currently occupied by an commercial/warehouse use. No displacement of existing people or housing would occur upon implementation of the Project. No impacts would occur and no mitigation measures are required.

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

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-----------------------------|--------------------------------------|--|-------------------------------------|-------------------------------------|
| a. Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Fire protection?

Less Than Significant Impact. A significant impact would occur if the Los Angeles Fire Department (LAFD) could not adequately serve the proposed project, necessitating a new or physically altered station. Fire protection and emergency medical services to the Project Site would continue to be served by the LAFD. The nearest LAFD station to the Project Site is Station 6, located at 326 N. Virgil Avenue, approximately 0.2 miles northeast of the Project Site. The City's standard for distance to a fire station is 1-1/2 miles.⁷¹ Given the proximity of the Project to Station 6, response time would not be substantial and new or expanded facilities would not be needed. Therefore, impacts would be less than significant, and no mitigation measures are required.

b. Police protection?

Less Than Significant Impact. A significant impact would occur if the Los Angeles Police Department (LAPD) could not adequately serve the proposed project, necessitating a new or physically altered station. The Project Site is located within the area served by the Olympic Community Station of the LAPD, located at 1130 South Vermont Avenue (approximately 1.8 miles south of the project site). The Project would introduce new students on the Project Site, thereby generating a potential increase in the number of service calls to the site. As screening criteria for impacts on police services, the *L.A. CEQA Thresholds Guide* considers whether a proposed Project would result in a net increase of 75 residential units or 100,000 square feet of commercial

⁷¹ City of Los Angeles, *General Plan Framework, Chapter 9: Infrastructure and Public Services*.

floor area, or 200,000 square feet of industrial floor area, or have the potential to generate 1,000 or more average daily vehicle trips.⁷² The Project includes construction of a 24,360 square foot building and would generate 386 daily vehicle trips. As such, it is not anticipated that there would be a need to build a new or expand an existing police station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for police protection. Therefore, impacts would be less than significant, and no mitigation measures are required.

c. Schools?

Less Than Significant Impact. A significant impact would occur if the proposed project would include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the school district. The current school site is located at 668 S. Catalina Street approximately 1 mile from the Project Site with a maximum of 250 students. The proposed Project is a charter school that represents an opportunity to relieve the demand on existing public schools and offer an alternative to nearby residents. The proposed Project would include a capacity of 480 students in a public transitional TK to 8TH grade charter school. Therefore, impacts would be less than significant, and no mitigation measures are required.

d. Parks?

No Impact. A significant impact would occur if the proposed project would exceed the capacity or capability of the local park system to serve the proposed project. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include but not limited to: Madison West Park (located 0.28 miles from the Project Site); Occidental Parkway (located 0.6 miles from the Project Site); and Bellevue Recreation Center (Located 0.64 miles from the Project Site)

As a screening criterion for impacts on parks, the *L.A. CEQA Thresholds Guide* considers whether a proposed Project would result in a net increase of 50 residential units or more that would adversely impact recreation and park services and/or facilities due to the Project's proximity, or expected usage of, those facilities or services. The Project does not meet this screening criterion. As such, no impacts would occur, and no mitigation measures are required.

e. Other public facilities?

Less Than Significant Impact. A significant impact would occur if the proposed project would result in substantial employment or population growth that could generate a demand for other public facilities, including libraries, which exceed the capacity available to serve the project site, necessitating new or physically altered public facilities, the construction of which would cause significant environmental impacts. As a screening criterion for impacts on libraries, the *L.A. CEQA Thresholds Guide* considers whether a proposed Project would result in a net increase of 75 residential units. The Project does not meet this screening criterion. As such, the Project would

⁷² City of Los Angeles, Department of City Planning, *LA CEQA Thresholds Guide*, 2006, Page K.1-1

not result in significant impacts on library facilities. Impacts would be less than significant, and no mitigation measures are required.

XVI. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities. The Proposed School would consist of outdoor recreational areas, which includes playgrounds, lunch areas, planting gardens and basketball courts, and a soccer field. The Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities, such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant and mitigation measures would not be required.

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. The Project would not include the development of public recreational facilities or require the expansion of recreational facilities. As mentioned above, the Proposed School would consist of outdoor recreational areas, which includes playgrounds, lunch areas, planting gardens and basketball courts, and a soccer field. Therefore, impacts would be less than significant and no mitigation measures are required.

XVII. TRANSPORTATION

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

The following section summarizes and incorporates by reference information from the *Everest Value School Transportation Assessment* from November 2019, prepared by KOA on behalf of the Applicant. The Transportation Assessment and LADOT's Assessment Form, dated January 14, 2020, are included as **Appendix E** of this ND.

Less than Significant Impact. A significant impact may occur if the project conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Trip generation estimates for the Project were calculated based on the latest edition of the Institute of Transportation Engineers' *Trip Generation* manual (refer to **Appendix E**). The maximum enrollment of 480 students and removal of the existing warehouse use would generate a net total of 386 daily vehicle trips and 2,015 vehicle-miles travelled (VMT).⁷³

As stated per the LADOT TAG,⁷⁴ a new development would have potential impacts when work VMT per employee drops 15 percent below the existing average work VMT per employee for the Area Planning Commission (APC). As shown in **Table 4.12**, not taking into account the removal of existing uses and any mitigation measures, the Project would result in a work VMT per employee of 7.1, below the 7.6 VMT per employee threshold for the Central APC.

Additionally, although the City's VMT Calculator does not yield any impacts, the LADOT Approval Letter (**Appendix E.2**) provides additional regulatory best practices to further reduce potential

⁷³ City of Los Angeles VMT Calculator Version 1.0

⁷⁴ Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines, July 2019.

traffic impacts. These practices include but not limited to providing adequate vehicle and bicycle parking up to Code standards; providing necessary traffic controls, school warning and speed limit signs; and providing a worksite traffic control plan during construction. The proposed Project is not anticipated to cause a significant VMT impact based on the City of LA's VMT criteria. Impacts would be less than significant, and no mitigation measures are required.

TABLE 4.12
PROJECT VMT ANALYSIS

| | |
|--------------------------------|----|
| Total Employees: 48 | |
| Total Population: 0 | |
| 386 Daily Vehicle Trips | |
| 2,015 Daily VMT | |
| 0 Household VMT per Capita | |
| 7.1 VMT per Employee | |
| Significant VMT Impact? | |
| Household > 6.0 | No |
| Work > 11.6 | No |

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. CEQA Guidelines section 15064.3, subdivision (b) states that land use projects that indicate VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor, as is the Project, should be presumed to cause a less than significant transportation impact. Pursuant to CEQA Guidelines section 15064.3(b)(1), Projects that decrease VMT in the Project area compared to existing conditions should be presumed to have a less than significant transportation impact.

CEQA Guidelines section 15064.3, subdivision (b), also states that transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact.

As provided in **Appendix E**, the Department of Transportation (DOT) reviewed the transportation assessment prepared by KOA dated November 2019. The significance of the Project's impact is measured against the VMT thresholds established in DOT's Transportation Assessment Guidelines (TAG). As explained above, the enrollment of 480 students and the removal of the existing warehouse use would generate a net total of 952 daily vehicle trips including 2,015 daily VMT. Additionally, the proposed Project is projected to have no Household VMT per capita and Work VMT per employee of 7.1 As such, the proposed Project is not anticipated to cause a significant VMT impact based on the City of LA's VMT criteria for the Central Los Angeles APC area. Impacts would be less than significant, and no mitigation measures are required.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. A significant impact could occur if a project include a new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if

project site access or other features were designed in such a way as to create hazard conditions. The Project would not include unusual or hazardous design features and the proposed Project is compatible with existing uses. The Project proposes a land use that complements the surrounding urban development and utilizes the existing roadway network. The Project would have a vehicular access point along Cosmopolitan Street, which would lead into the surface parking area and student drop-off area that exits along Madison Avenue. The Project's driveways would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. Impacts would be less than significant and no mitigation measures are required.

d. 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 through traffic control plans and/or encroachment permits issued by the City Engineer. Such closures would not be expected to interfere with emergency response or evacuation plans. Additionally, Temple Street is a selected disaster route as identified by the City's General Plan.⁷⁵ 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. Furthermore, the Project would be subject to the site plan review requirements of the LAFD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. The Project would not be expected to result in inadequate emergency access. Impacts would be less than significant.

⁷⁵ *City of Los Angeles General Plan "Safety Element"*, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, accessed June 2020, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

| | 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 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

Less Than Significant Impact. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the project site. An informational letter was mailed to a total of 11 Tribes known to have resources in this area, on April 2, 2020, describing the project and requesting any information regarding resources that may exist on or near the project site. On April 10, 2020, one tribal response was received from the Gabrieleno Band of Mission Indians – Kizh Nation who requested a formal request for tribal consultation under the provisions of CEQA for the mitigation of potential impacts to tribal cultural resources. On June 19, 2020, at approximately 3:00 pm, the City of Los Angeles Department of City Planning (Lead Agency) and the Gabrieleño Band of Mission Indians – Kizh Nation conducted an AB 52 Tribal Consultation that lasted one hour. No mutual agreement was reached during the tribal consultation and the City requested the Tribe provide substantial evidence in writing that the project location and trade route relative to the project site is listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in PRC Section 5020.1(k) or that this resource was 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 PRC Section 5024.1. The Tribe provided the City with additional maps, documents, and proposed mitigation measures for the proposed project on June 30, 2020. The City reviewed the additional information provided by the Tribe and determined that no substantial evidence was presented, no further consultation was conducted and the consultation was closed 14 calendar days after the City received the additional materials from the Tribe on June 30, 2020.

The Project Site is not found to be a potential historic resource in HistoricPlaces LA, SurveyLA or other City parcel reports or references. The nearest designated historic resources is the Franklin T. Briles Residence, approximately 2,600 feet to the southwest from the Project Site, which are

designated as Los Angeles Historic-Cultural Monuments.⁷⁶ Due to the distance of the Project Site, implementation of the Project would not alter any of the physical characteristics of the nearby historic resources, including through construction activities, vibration from off-road equipment, and operation of the proposed Project. Because the project site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known cultural resources, adherence to the Regulatory Compliance Measures for archeological resources, paleontological resources, and human remains would ensure impacts associated with the accidental discovery of any archaeological resources or human remains, including Native American resources would be avoided or reduced to less-than-significant levels. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in to PRC Section 21083.2. Therefore, impacts would be less than significant, and no mitigation measures are required.

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact. Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the Project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. In compliance with AB 52, the City will notify all applicable tribes and the Project will participate in any requested consultations. As discussed under Finding (a), above, the City conducted a consultation with the Gabrieleño Band of Mission Indians – Kizh Nation on June 19, 2020 beginning at approximately 3:00 p.m. and lasting for one hour. Upon review of supplemental materials submitted by the Tribe

⁷⁶ City of Los Angeles, Department of City Planning, Office of Historic Resources, HistoricPlacesLA, accessed October 2019, <http://www.historicplacesla.org/map>.

on June 30, 2020, the City determined that no substantial evidence was presented, no further consultation was conducted and the consultation was closed 14 calendar days after the City received the additional materials from the Tribe on June 30, 2020.

As noted above, the depth and extent of grading and excavation would be limited. As such, unearthing of subsurface cultural resources would be limited. In the event subsurface cultural resources are unearthed, the Project would comply with City regulations on how artifacts found during construction must be handled. As such the potential for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe would be less than significant and no mitigation measures are required.

XIX. UTILITIES AND SERVICE SYSTEMS

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact would occur if the proposed project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. Water in the City is supplied 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 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Water entering the Los Angeles Aqueduct Filtration

Plant (LAAFP) undergoes treatment and disinfection before being distributed throughout the LADWP's water service area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 240–260 mgd as of March 2018.⁷⁷ Therefore, the LAAFP has a remaining capacity of approximately 340–360 mgd, depending on the season.

The Los Angeles Bureau of Sanitation provides sewer service to the Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Treatment Plant (HTP). The HTP treats an average daily flow of 362 mgd and has the capacity to treat 450 mgd.⁷⁸ This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.

The Project Site is in a developed, urbanized portion of the City that is served by existing water and sewer mains. As shown in **4.13: Estimated Water Demand**, it is estimated that proposed Project would have a net daily water demand of 4,416 gallons, or 4.9 acre-feet per year (afy). The proposed Project would require approximately 0.01 percent of the remaining capacity of the LAAFP (which currently operates at 60 percent capacity). Therefore, the proposed Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Furthermore, the Project applicant would be required to implement applicable California Green Building Code requirements that would further reduce water demand.

TABLE 4.13
ESTIMATED WATER DEMAND

| Land Use | Quantity | Demand Factor (gpd/unit) ^a | Daily Demand (gpd) | Annual Demand (afy) |
|------------------|----------------|---------------------------------------|--------------------|---------------------|
| Proposed | | | | |
| School | 480 Students | 13.2 gpd/Student | 6,336 gpd | 7.1 |
| Current | | | | |
| Warehouse | 53,353 sq. ft. | 36/1,000 Gr SF | 1,920 gpd | 2.2 |
| Net Total | — | — | 4,416 gpd | 4.9 |

Note: afy = acre-feet per year; gpd = gallons per day

^a 120 percent sewage generation loading factor; City of Los Angeles, Bureau of Sanitation, *Sewage Generation Factors*, April 2012.

As shown in **Table 4.14: Estimated Sewage Generation**, it is estimated that the proposed Project would generate a net increase 3,680 gpd (4.1 afy) of wastewater. The proposed Project would require approximately 0.01 percent of the remaining capacity of the HTP, which currently operates with 88 mgd of remaining capacity.

⁷⁷ Phone conversation with Jeff Shaffen, LAAFP Control Room Operator, March 21, 2018.

⁷⁸ City of Los Angeles Department of Public Works, Bureau of Sanitation, *Wastewater System Fact Sheet* (2014).

TABLE 4.14
ESTIMATED SEWAGE GENERATION

| Land Use | Quantity | Demand Factor ^a (gpd/unit) | Daily Generation (gpd) | Annual Demand (afy) |
|------------------|----------------|--|------------------------------|------------------------|
| Proposed | | | | |
| School | 480 Students | 11 gpd/Student | 5,280 gpd | 5.9 |
| Current | | | | |
| Warehouse | 53,353 sq. ft. | 30/1,000 Gr SF | 1,600 gpd | 1.8 |
| Net Total | | | 3,680 gpd | 4.1 |

Note: afy = acre-feet per year; gpd = gallons per day.

^a *City of Los Angeles, Bureau of Sanitation, Sewage Generation Factors, April 2012.*

The Project Site is located in an urbanized location that is currently served by stormwater infrastructure. The Project Site would continue to be predominantly impervious surface. In addition, the Project would be required to demonstrate compliance with the City's 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.

The Project Site is located in a developed, urbanized setting that is served by existing electric power, natural gas and telecommunications services. In the context of the greater Los Angeles service area, the Project would not be a substantial source of new demand for electrical or telecommunications services. New connections would be established for the Project; however, no substantial electrical, gas, or telecommunications infrastructure is present on or adjacent to the Project Site that would need to be relocated to accommodate the Project. Impacts would be less than significant, and no mitigation measures are required.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. As mentioned above, water is provided by LADWP. The proposed Project would not directly require or result in the construction of potable water treatment facilities because it would connect into these existing water services.

The LADWP adopted a new Urban Water Management Plan (UWMP) in June 2016⁷⁹ which serves as a master plan for water supply and resources management consistent with LADWP goals and policy objectives. The UWMP forecasts expected cumulative growth in water demand and identifies matching water supplies. According to the UWMP, the total forecasted demand for water during a single dry season was 513,540 afy for 2015 and would be 611,800 afy for 2020.⁸⁰

⁷⁹ Los Angeles Department of Water and Power, Urban Water Management Plan 2015, June 7, 2016.

⁸⁰ City of Los Angeles Department of Water and Power, 2015 City of Los Angeles Urban Water Management Plan [2015 UWMP] (2016), available at <https://www.ladwp.com>

The UWMP projects adequate water supplies to meet cumulative forecasted demand through 2040, the planning horizon for the current UWMP. The Project demand of 4.9 afy would be less than 0.01 percent of the available capacity during a single dry year in 2020. The Project is considered to be within the growth projections used by the LADWP in forecasting cumulative future demand. As such, it is expected that LADWP has sufficient water supplies available to serve the proposed Project.⁸¹ Furthermore, as previously stated, the Project applicant would be required to adhere to current standards, including the California Green Building Code, that would reduce demand on local water supplies. Thus, LADWP has sufficient water supplies available to serve the proposed Project from existing entitlements and resources, and no new or expanded entitlements are needed. As such, impacts would be less than significant, and no mitigation measures are required.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Wastewater flows from the Project Site would be conveyed to the HTP through existing sewer lines. The HTP is managed by the City of Los Angeles. The City has adopted an Integrated Resources Plan (IRP) that includes a Wastewater Facilities Plan addressing forecasted cumulative system demand and identifying sufficient capacity to meet that demand.⁸² Operation of the proposed Project would result in an increase in the amount of wastewater generated on the Project Site compared to existing conditions. As stated above, the HTP has capacity to serve the Project's projected wastewater demand, in addition to the provider's existing commitments. Furthermore, the Project is considered to be within the growth projections used in forecasting cumulative future demand. As such, impacts would be less than significant and no mitigation measures are required.

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. Solid waste generated within the City is disposed of at landfill facilities throughout Los Angeles County. The solid waste is collected and taken to Athens's recycling facility, the City of Industry Materials Recovery Facility. Food waste is processed and transported to Athens's compost facility in Victorville, American Organics. Remaining waste that cannot be recycled is disposed on a regular basis to one of four facilities within Los Angeles County.

As shown in **Table 4.15: Expected Operational Solid Waste Generation**, the Project's net generation of solid waste is projected to result in a reduction of waste generation when compared to existing uses.

⁸¹ LADWP, 2015 UWMP.

⁸² City of Los Angeles, Department of Public Works, Bureau of Sanitation and Department of Water and Power, *City of Los Angeles Integrated Resources Plan Executive Summary*, December 2006.

TABLE 4.13
ESTIMATED OPERATIONAL SOLID WASTE GENERATION

| Type of Use | Size | Waste Generation Rate ^a (lb./unit/day) | Total Solid Waste Generated (lb./day) |
|------------------|----------------|---|---------------------------------------|
| Proposed | | | |
| School | 480 Students | 1 lb./student/day | 480 lb./day |
| Current | | | |
| Warehouse | 53,353 sq. ft. | 1.42 lb./100 sq. ft./day | 758 lb./day |
| Net Total | | | -278 lb./day |

Notes: lb. = pounds; sf =square feet.

^a City of Los Angeles, Bureau of Sanitation, Solid Waste Generation (1981). Waste generation includes all materials discarded, whether they are later recycled or disposed of in a landfill.

In addition, the County addresses forecasted cumulative landfill demand and capacity through the preparation of annual County of Los Angeles Integrated Waste Management Plan (ColWMP) reports. The current ColWMP has identified sufficient capacity to meet the cumulative forecasted landfill needs within the County. The Project is considered to be within the growth projections used in forecasting cumulative demand. The preparation of each annual ColWMP report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. As such, construction and operation of the proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals. Impacts would be less than significant, and no mitigation measures are required.

e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. As under current conditions, solid waste generated on site would be disposed of in accordance with all applicable federal, State, and local regulations related to solid waste. In addition, the Project would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939) which was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum amount feasible. Specifically, the Act requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000 and 70 percent by the year 2020. As such, compliance with local regulations, impacts would be less than significant, and no mitigation measures are required.

XX. WILDFIRE

| Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--------------------------------------|--|------------------------------------|-----------|
|--------------------------------------|--|------------------------------------|-----------|

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

No Impact. Wildland fire protection in California is the responsibility of either the local government, State, or the federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which the California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government (CAL FIRE 2019a). LAFD provides fire protection and emergency medical services to the County. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone model as the basis for evaluating fire hazard in LRAs. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA.

The Project Site is not in or near an SRA or LRA or lands classified as FHSZ. The nearest FHSZ is approximately 14 miles to the southeast in Whittier. The Project Site is not in or near an SRA or LRA or lands classified as high fire hazard severity zones. Therefore, no impact would occur and no mitigation measures are required.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As demonstrated above, the Project Site is not in or near an SRA or LRA or lands classified as high fire hazard severity zones. The Project is located on relatively flat land and would not change or exacerbate current risks of wildfire or pollutant concentrations from a wildfire to protect occupants. Therefore, no impact would occur no mitigation measures are required.

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?

No Impact. As demonstrated above, the Project Site is not in or near an SRA or LRA or lands classified as high fire hazard severity zones. The Project would not require the installation or maintenance of any infrastructure or utility improvements or additions. As such, impacts related to infrastructure modifications increasing fire risk would not result in any impacts and no mitigation measures are required.

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. As demonstrated above, the Project Site is not in or near an SRA or LRA or lands classified as high fire hazard severity zones. Development of the Project Site would not exacerbate wildfire hazards on site. The Project is not located near a potential flooding, landslide area, or would result in potential drainage changes. No impacts would occur and not mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Less Than Significant Impact. A significant impact could occur only if the Project would have an identified potentially significant impact for any of the environmental topics addressed in this IS. However, as described above, the Project would not result in any significant impacts. The Project is located in a densely populated urban area and would have no significant impacts with respect to biological and cultural resources. The proposed Project does not have the potential to significantly degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, or threaten to eliminate a plant animal community. The Project is located in a developed, urbanized area and will not disrupt or hinder any known habitats. Impacts would be less than significant and no mitigation measures are required.

b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. A significant impact may occur if the proposed Project, in conjunction with the related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together. The following projects were or are filed with the Department of City Planning:

| PROJECTS WITHIN A QUARTER-MILE FROM THE SUBJECT SITE | | | |
|--|--|-------------------|---|
| (filed or filed and approved prior to the CEQA Baseline, October 17, 2019) | | | |
| Address | Case Number | Date Filed | Scope of Work |
| 200 N. Vermont Avenue | DIR-2019-848-TOC-SPPA-SPP-SPR | 2/11/2019 | Demolition of an existing 9,280 commercial area to construction, use, and maintenance of mixed use project of 490 residential units including 49 ELI units within a 6-story building, and on-site parking. |
| 321 N. Madison Avenue | CPC-2019-5596-GPAJ-ZCJ-SP-SPP-SPR; VTT-82798 | 9/19/2019 | Demolition of existing three (3) commercial buildings, three (3) single-family residential buildings, one (1) surface parking lot and 11 trees; and the construction, use and maintenance of 454 Permanent Supportive Housing Units; 23 restricted to Extremely Low Income, 376 restricted to Low Income Households, and five (5) market rate manager’s units on a 94,623 square foot site. |

Per the table above, there are two (2) projects filed or filed and approved with the City Planning Department which involved demolition and construction of non-residential square-footage. These projects have yet to receive a Certificate of Occupancy from LADBS. In-conjunction with the above projects, there is no cumulative impact related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and service systems. Although projects may be constructed in the Project vicinity, the cumulative impacts to which the proposed Project would contribute would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the proposed project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Upon implementation of the Regulatory Compliance Measures applicable and compliance with existing regulations, any potentially significant impacts would be reduced to less than significant levels.