



City of Los Angeles

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

SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT

The Parks in LA

Wilshire Community Plan Area
Case Number: ENV-2019-2568-SCEA

Project Location: 3431-3455 W. 8th Street, 749, 765 & 767 S. Harvard Boulevard, Los Angeles, California, 90005

Council District: 10 - Hutt

Project Description: The Project Site is currently developed with five existing commercial buildings totaling approximately 20,000 square-feet in size, and one single-family house approximately 2,000 square-feet in size. The existing structures and hardscape will be demolished for the construction of an eight-story (88'-6" high to top of parapet), mixed-use building with 40,500 square-feet of commercial space and 251 residential units, including 29 income-restricted units, above two levels of subterranean parking with 284 automobile parking spaces and 204 bicycle parking spaces. The first floor will contain two residential lobbies, 18,000 square-feet of commercial space, outdoor seating areas, an internal courtyard, and a public parklet at the corner of Harvard Boulevard and 8th Street. The second floor will contain 7,000 square-feet of commercial office space, 15,500 square-feet of creative office space, 18 live/work loft units, and 4,500 square-feet of communal area for the floor. The third floor is a loft level, and the fourth through eighth floors will contain the remaining residential units and residential amenities. The building will total 292,820 square-feet on a 63,118 square-foot lot and require the export of 58,300 cubic yards of soil intended for the Azusa Land Reclamation landfill approximately 27 miles east of the project site. There are no protected trees on or adjacent to the Project Site. Fifteen (15) non-protected on-site trees proposed for removal and replacement on site.

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November 2022

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I. INTRODUCTION

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

Project Name: The Parks in L.A. Mixed Use Project

Project Applicant: Charles Park & Associates, LLC

Project Location: 3431-3455 W. 8th Street, 749, 765 & 767 S. Harvard Boulevard

Community Plan Area: Wilshire

Council District: 10 – Hutt

Project Description Summary: The infill Project will construct an eight-story mixed-use building with 251 residential units above two levels of subterranean parking on 1.45 acres located on 8th Street West between Hobart and Harvard Boulevards in the Wilshire Community Plan area. The proposed building will have 18,000 square-feet of commercial retail space on the ground floor and 22,500 square-feet of office space on the second floor. Residential units include 18 live/work units and 29 income-restricted units, and a total of 284 automobile parking spaces and 204 bicycle parking spaces are included. Construction will require demolition of five existing commercial buildings and one single family house comprising a total of approximately 22,000 square-feet.

The Project Applicant is requesting the following entitlements:

- 1) Pursuant to Charter Section 555 and LAMC Section 11.5.8, a General Plan Amendment to re-designate the land use designation in the Wilshire Community Plan from Neighborhood Office Commercial to Regional Commercial for all Project parcels;
- 2) Pursuant to City Charter Section 558 and LAMC Section 12.32.F, a Zone change from PB to C2 for APNs 5093-018-007, -017, -018;
- 3) Pursuant to City Charter Section 558 and LAMC Section 12.32.F, a Height District change from No. 1 to No. 2 for all parcels;
- 4) Pursuant to LAMC Section 11.5.11(e), two Developer Incentives to permit:
 - a. To allow a 16-foot rear yard setback in lieu of the 20-foot rear yard setback otherwise required;
 - b. A 20 percent reduction to permit a minimum 20,580 square feet of overall usable open space in lieu of the minimum 25,725 square feet otherwise required.
- 5) Pursuant to LAMC Section 16.05, a Site Plan Review for a mixed-use development project that creates 251 dwelling units and 61,500 square feet of commercial floor area.
- 6) Pursuant to LAMC Section 12.24.W-1 and ZA Memo No. 126, a Main Conditional Use Permit to allow the sale of a full-line of alcoholic beverages for on-site consumption in conjunction with three restaurants.

INFORMATIONAL BACKGROUND ON SB 375 & SCEA

The State of California adopted Senate Bill 375 (SB 375), also known as “The Sustainable Communities and Climate Protection Act of 2008,” which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California’s greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations (MPOs)

to incorporate a “sustainable communities strategy” (SCS) into their regional transportation plans to achieve their respective region’s GHG emission reduction targets set by the California Air Resources Board (CARB). Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria; one such CEQA streamlining tool is the SCEA.

The Southern California Association of Governments (SCAG) is the MPO for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS aka Connect SoCal) is the most recent RTP/SC adopted by SCAG. The 2020-2045 RTP/SCS is a long-range visioning plan that examines existing land use and transportation conditions throughout the SCAG region and forecasts how the plan will meet the region’s transportation needs between 2020 and 2045, as well as achieve CARB’s GHG emissions reduction targets. On September 3, 2020, SCAG’s Regional Council adopted the 2020-2045 RTP/SCS. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB’s 2035 GHG emission reduction target of 19 percent below 2005 per capita emissions levels.

SB 375 allows the City, acting as lead agency, to prepare a SCEA as the environmental CEQA Clearance for “transit priority projects” (as described below) that are consistent with the 2020-2045 RTP/SC.

TRANSIT PRIORITY PROJECT CRITERIA

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

- 1) Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2020-2045 RTP/SC;
- 2) Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
- 3) Provides a minimum net density of at least 20 units per acre; and
- 4) Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

SCEA PROCESS AND STREAMLINING PROVISION

Qualifying TPPs that have incorporated all feasible mitigation measures and performance standards, or criteria set forth in the prior applicable EIR (i.e., SCAG’s 2020-2040 RTP/SCS Program EIR) and that are determined to not result in significant and unavoidable environmental impacts may be approved with a SCEA. The specific substantive and procedural requirements for the approval of a SCEA include the following:

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

- b) Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network.¹
- 2) The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.
- 3) The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.
- 4) A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA.
- 5) The SCEA may be approved by the lead agency after the lead agency's legislative body, or a planning commission if local ordinances allow for the appeal of a CEQA determination by a non-elected decisionmaker to the legislative body, conducts a public hearing, reviews comments received, and finds the following:
 - a) All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, and
 - b) With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:
 - i) Changes or alterations have been required or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.
 - ii) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- 6) The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

REQUIRED FINDINGS

The City of Los Angeles finds, based on the information contained in Section II (Project Description), Section III (SCEA Criteria and Transit Priority Project Consistency Analysis), Section IV (RTP/SCS Project EIR Mitigation Measures), and Section V (Sustainable Communities Environmental Impact Analysis) of this document, the City finds that preparation of a SCEA in accordance with Public Resources Code Section 21155.2(b) is appropriate for the Project for the following reasons:

- The Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the area of the Project Site in the 2020-2045 RTP/SCS prepared by SCAG, which is the MPO for the City.
- The State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted SCAG's determination that the sustainable communities strategy adopted by SCAG would, if implemented, achieve the greenhouse gas emission reduction targets.

¹ "Regional transportation network" means all existing and proposed transportation system improvements, including the state transportation system, that were included in the transportation and air quality conformity modeling, including congestion modeling, for the final regional transportation plan adopted by the metropolitan planning organization, but shall not include local streets and roads. Nothing in the foregoing relieves any project from a requirement to comply with any conditions, exactions, or fees for the mitigation of the project's impacts on the structure, safety, or operations of the regional transportation network or local streets and roads.

- D units an acre; and is within one-half mile of a major transit stop or high- quality transit corridor included in a regional transportation plan;
- The Project is a residential or mixed-use project as defined by Public Resources Code Section 21159.28(d);
- The Project incorporates all relevant and applicable mitigation measures, performance standards, or criteria set forth in the prior environmental reports and adopted findings made pursuant to Public Resources Code Section 21081, including the 2020-2045 RTP/SCS Program EIR;
- All potentially significant or significant effects required to be identified and analyzed pursuant to CEQA in an initial study have been identified and analyzed in an initial study; and
- As outlined in detail in Section V (Sustainable Communities Environmental Impact Analysis) changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of less than significant.

ORGANIZATION OF THE SCEA

Based on the information presented above, the SCEA for the Project is organized into sections as follows:

Section I. Introduction: Provides introductory information about the Project and background information regarding SB 375, lists the TPP criteria, and describes the required content of the SCEA.

Section II. Project Description: Provides a detailed description of the environmental setting and the Project characteristics.

Section III. SCEA Criteria and Transit Priority Project Consistency: Includes a discussion of the Project's consistency with the TPP criteria listed above and demonstrates that the Project satisfies all necessary criteria for approval of a SCEA as set forth in California Public Resources Code Sections 21155 and 21155.2.

Section IV. Applicability of Prior EIR Mitigation Measures: Identifies all of the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for SCAG's 2020-2045 RTP/SCS Program EIR and provides a discussion of the applicability of the mitigation measures to the Project.

Section V. Initial Study/Sustainable Communities Environmental Impact Analysis: For each environmental issue identified in the Initial Study Checklist, contains an assessment and discussion of Project-specific and cumulative impacts associated with each subject area. Where the evaluation identifies potentially significant effects, as identified on the Checklist, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Sections VI-VIII: List of Preparers; References; Appendices.

II. PROJECT DESCRIPTION

ENVIRONMENTAL SETTING

The Project Site is located in a densely developed urbanized area of Los Angeles. The 63,118.5 square-foot, 1.45 acre Site occupies several parcels on the north side of West 8th Street, between Hobart Boulevard to the west and Harvard Boulevard to the east, within the Wilshire Community Plan area of the City. These are lots 110, 111, 112, 113, and 114 of the Wilshire Harvard Heights Tract, and lots 202, 201 and part of 200 of Tract 2189, Assessor Parcel Numbers (APNs) 5093-018-017, -018, -019, -020 & 5093-018-007, -008, -009. The Site has street frontage on all three streets and existing buildings are addressed as 3431-3455 W. 8th Street, 749, 765, and 767 S. Harvard Boulevard. The Site is currently developed with five commercial buildings clustered together to the southeast oriented toward 8th Street, and one single-family house in the northeastern parcel facing Harvard Boulevard. Separating the house and the commercial buildings is a parking lot that extends between Hobart and Harvard Boulevards, and a parking lot covers the southwest corner of the Site at the intersection as well. Two of the commercial buildings are two-story, the other three are single-story, and the single-family house is single-story as well. The commercial buildings comprise approximately 17,800 square-feet of gross floor space, and the single-family house is approximately 2,084 square-feet in size.

There are no protected trees on or adjacent to the Project Site as defined by Section SEC. 46.01 of the Los Angeles Municipal Code (LAMC)². Within the public right-of-way adjacent to the Project Site there are 12 “significant” trees (trees at least 8 inches in diameter) and 12 trees under 8 inches in diameter. Three of the significant street trees will be removed. “Significant” trees are not protected but are identified for the City for planning purposes. Inside the Project parcel boundaries are a total of 25 trees, with 15 of them over 8 inches in diameter, all of which will be removed for construction of the Project. These trees are detailed in **Table II-1, Project Tree Inventory**.

Table II-1
Project Tree Inventory

| Street Trees | Count | To Be Removed |
|--|--------------|----------------------|
| <i>Ficus macrocarpa</i> | 11* | 3* |
| <i>Butia capitata</i> | 1 | - |
| <i>Cupressus sempervirens</i> | 11 | 11 |
| <i>Callistemon viminalis</i> | 1 | - |
| On Site Trees | Count | To Be Removed |
| <i>Ficus macrocarpa</i> | 4* | 4* |
| <i>Brachychiton sp.</i> | 1 | 1 |
| <i>Cupaniopsis anacardioides</i> | 1* | 1* |
| <i>Punica granatum</i> | 2 | 2 |
| <i>Eriobotrya deflexa</i> | 1* | 1* |
| <i>Washingtonia robusta</i> | 7* | 7* |
| <i>Eriobotrya japonica</i> | 6 | 6 |
| <i>Citrus sp.</i> | 1 | 1 |
| <i>Fraxinus uhdei</i> | 2* | 2* |
| * Indicates over 8” in diameter. Source: Class One Arboriculture Inc., 3433 W. 8 th St. Arborist Report, August 9, 2021 and YKD Landscape Architecture Urban Design, 3433 West 8 th Street, June 1, 2021 | | |

² Native oak trees (*Quercus spp.* excluding scrub oak), Southern California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), California bay (*Umbellularia californica*), Mexican elderberry (*Sambucus mexicana*), and toyon (*Heteromeles arbutifolia*)

The Site is bounded to the west, south, and east by the aforementioned streets, and to the north by two and three-story multifamily residential buildings. The Project Site fronts 8th Street, an arterial classified as an Avenue II, which is chiefly a commercial corridor within the immediate vicinity with two travel lanes in both directions. Within 0.2 to 0.34 miles in each direction are the arterial streets Western Avenue (west), Wilshire Boulevard (north), Irolo Street (east), and Olympic Boulevard (south). Each contains two or more travel lanes in each direction, with the exception of Irolo Street which has in sections just one travel lane in each direction. Local streets within this area tend to be lined with multifamily residential buildings, with a few single-family houses scattered about, and the arterials tend to be lined with commercial buildings with some multifamily or mixed-use residential buildings, with the exception of Irolo Street which is primarily multifamily. Residential buildings in the area range between two and eight stories tall, with five to eight story buildings common within a 0.5 mile radius of the site, including Ashby Apartments directly south of the Site on 8th Street, and The Harper apartment building directly southeast on 8th Street. Residential or mixed-use residential buildings over ten stories tall can be found near Wilshire Boulevard. Commercial buildings tend to be more low-slung, with the exception of buildings along Wilshire Boulevard which can reach over 20 stories tall.

Nearby Transit

There are multiple transit options within 0.5 miles of the site. Los Angeles Metro bus route 66 runs along 8th Street with stops roughly every 2 to 3 blocks. North/south bus routes run on Irolo Street to the east (route 206) and Western Avenue to the west (bus route 207). The LADOT DASH Wilshire Center/Koreatown clockwise and counterclockwise routes also run on Western Avenue. Metro's rail service can be accessed from either the Wilshire/Western station or the Wilshire/Normandie station, both roughly 0.3 miles from the project site providing access to the Purple Line, and bus routes 720 and 20 both run on Wilshire Boulevard. Further from the site, bus route 18 is available on 6th Street, and route 28 on Olympic Boulevard.

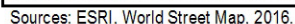
The regional context for the Site is shown in **Figure II-1, Regional Location Map**, and the boundaries of the Site and its local context is shown in **Figure II-2, Vicinity Map**.

Zoning and General Plan Designation

The Project parcel containing the single-family house and the two parcels adjacent to it are zoned PB-1 (Parking Building Zone, Height District 1), the remaining majority of the Site is zoned C2-1 (Commercial Zone, Height District 1). The majority of the block the Project Site is part of is zoned R4-2 (Multiple Dwelling Zone, Height District 2), and most of the blocks lining 8th Street in either direction are zoned C2 where adjacent to 8th Street and R4 for the rest of the block. Per the Wilshire Community Plan the Project Site parcels all share the land use designation of Neighborhood Office Commercial, with the majority of the block north of the Site designated High Medium Residential. Similar to the zoning, nearby blocks are designated Neighborhood Office Commercial adjacent to 8th Street, and High Medium Residential for the remainder of the properties. The Project Site and other properties within the immediate vicinity are also located within a Tier 3 Transit Oriented District, and within the boundaries of the Wilshire Center and Koreatown Redevelopment Project Area, however, this does not affect the proposed Project. Zoning for the Site and its surroundings is shown in **Figure II-3, Existing Zoning**, and land use designations shown in **Figure II-4, Existing Land Use**.

PROJECT DESCRIPTION

The Project proposes to redevelop the subject parcels through demolition and removal of all existing structures, hardscape, and landscaping, to construct an eight-story, 88'-6" tall (to top of parapet), mixed use apartment building above two basement parking floors. The building will have an approximately 59,630 square-foot footprint and 292,820 square-feet of gross floor area. A total of 284 auto parking spaces will be



Regional Location Map





Aerial Source: Google Earth Pro, March 14, 2018.

THE PARKS IN L.A. MU PROJECT – SCEA & IS

Vicinity Map

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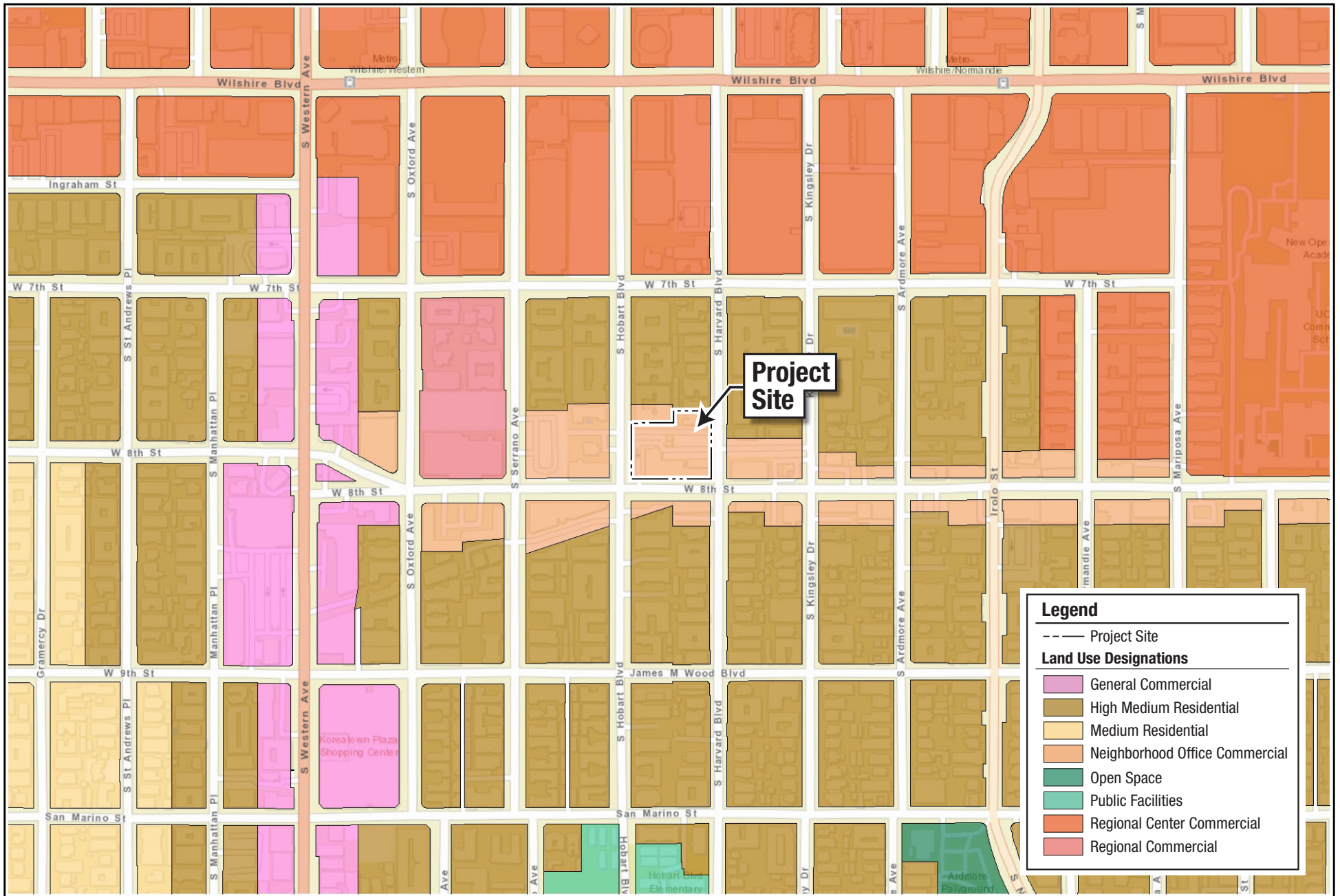


FIGURE

11-2

envicam





Source: ESRI World Street Map Background Imagery, 2022. Los Angeles GeoHub, General Plan Land Use, 2022.

provided, primarily on the two basement levels, and 165 long-term and 39 short-term bicycle parking spaces will be provided on the ground floor. The ground floor will also contain two residential lobbies, 18,000 square-feet of commercial space, outdoor seating areas, an internal courtyard, a public parklet at the corner of Harvard Boulevard and 8th Street, and mechanical and electrical rooms. **Figure II-5, Ground Floor Plan**, shows proposed ground floor components and footprint of the building. The second floor will contain 7,000 square-feet of commercial office space, 15,500 square-feet of creative office space, 18 live/work loft units, and 4,500 square-feet of communal area for the floor. The third floor is a loft level containing the upper floors of the live/work units, and the extended ceiling space of the offices below. The fourth floor contains 39 residential units, an outdoor area open to the sky, and 5,200 square-feet of residential amenity spaces. **Figure II-6, Second Floor Plan**, and **Figure II-7, Fourth Floor Plan**, provide the layouts for the second and fourth floor. The fifth floor contains 47 residential units, the sixth, seventh and eighth floors contain 49 units each. The plan for the upper floors is shown in **Figure II-8, Upper Residential Floor Plans**. Units consist of live/work, studio, one-bedroom, and two-bedroom apartments. A total of 29 units will be income-restricted with 16 very-low income and 13 extremely low income restricted. The type and number of units are detailed below in **Table II-2, Residential Unit Mix**.

Table II-2
Residential Unit Mix

| Unit Type | Unit Amount | No. Affordable Units |
|--------------|-------------|----------------------|
| Live/Work | 18 | 2 |
| Studio | 95 | 11 |
| 1 Bedroom | 113 | 13 |
| 2 Bedroom | 25 | 3 |
| Total | 251 | 29 |

Source: CORBeL Architects, The Parks in L.A. (TPLA) Entitlement Plan Set August 2, 2022.

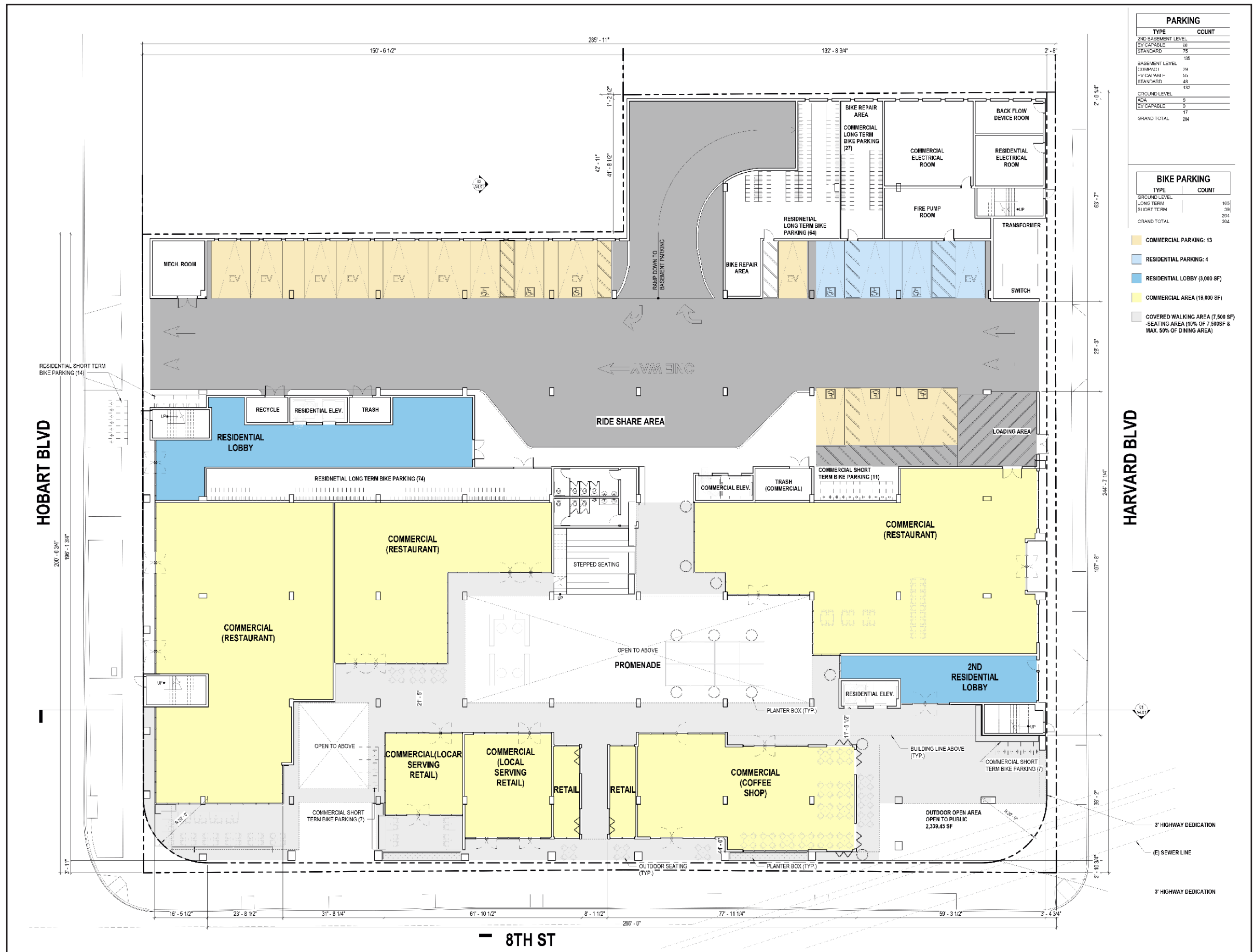
Site Access and Parking

Auto ingress will be available from Harvard Boulevard from a one-way, double-width driveway which will travel through the building to the egress point at Hobart Boulevard. This is illustrated in Figure II-5, Ground Floor. The driveway will provide access to 13 commercial and four residential parking stalls on the ground floor, and access to the basement parking levels which contain 132 commercial stalls on the upper floor, and 134 residential stalls on the lower floor. In providing 11 percent of the housing units as income-restricted to very low and extremely low income tenants, the Project is entitled to concessions/incentives and parking reductions pursuant to the California Density Bonus Law found in California Government Code (CGC) Sections 65915 – 65918. Pursuant to the LAMC a total of 333 parking spaces would be required for the residential units. The Density Bonus Law allows housing projects with 11 percent very low income units within 1/2 mile of accessible major transit stop to provide .5 parking spaces per unit. The Project is therefore providing 1 space for each two-bedroom unit and .5 spaces for each other unit, for a total of 139 residential parking spaces. A total of 204 bicycle parking spaces will be provided, with 52 reserved for the commercial/office uses.

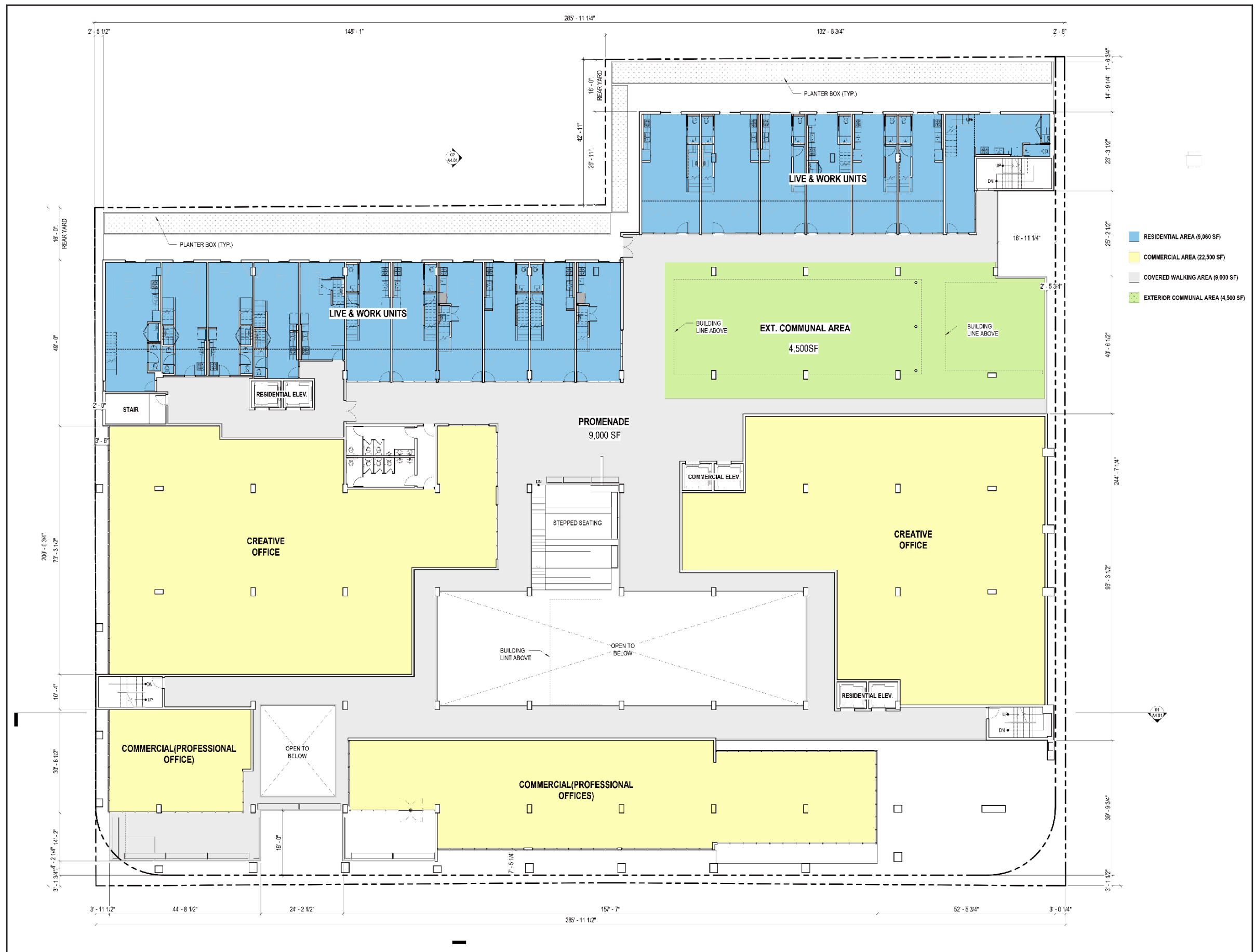
The residential lobbies are oriented to the side streets, but can be accessed by pedestrians from 8th Street as well. Commercial spaces can be accessed from Harvard Boulevard or 8th Street, with the exception of the large commercial space in the southwest corner which can only be accessed from Hobart Boulevard. Primary pedestrian access to the commercial promenade space is from 8th Street but can be accessed from the corner of Harvard Boulevard and 8th Street as well.

Open Space and Landscaping

Required residential open space is 25,725 square-feet, the Project proposes 20,700 square-feet of residential open space. This would be provided by private balconies (5,600 square-feet, 27%), common open space on



Source: Corbel Architects, Dec.18, 2019.



Source: Corbel Architects, Dec.18, 2019.



Source: Corbel Architects, Dec.18, 2019.

the second and fourth floors (10,300 square-feet, 50%), and indoor amenity space on the 4th floor (4,800 square-feet, 23%). This figure does not include the ground-floor promenade or corner parklet, or the 4,500 square-foot communal space on the second floor.

Landscaping will be found on the ground, second, and fourth floors. On the ground floor there will be ivy planted at the back of the building, planters within the promenade and near commercial suites containing shrubs and perennials, a large planter with two trees in the parklet, and three trees near the southwest corner of the building. On the second floor large planters containing shrubs will be placed at the south edge of the building within the live/work units shared open space. The 4,500 square-foot communal space will be landscaped with planters containing small trees, and there will be planters along the south side of the building and near the center as well. The residential open space on the fourth floor will be lined by planters and trees, and there will be planters lining the south side of the building. Landscaping for these three floors is presented in **Figures II-9 to II-11, Landscaping**, and architectural renderings provided in **Figures II-12 to II-13, Architectural Rendering**.

Density, Floor Area, Height

The requested general plan designation of Regional Commercial Center, combined with the requested C2 zoning, would allow up to 316 dwelling units on the subject property. Per Section 12.22.A.18 of the LAMC, R5 levels of density (200 square-foot minimum area per dwelling unit) are allowed in the C2 zone when the project is mixed-use and located within a Regional Commercial Center land use area. The lot area of 63,196.5 square feet therefore provides 315.98 units, and the Project is proposing 251. The requested Height District No. 2 allows a Floor Area Ratio (FAR) of 6:1 and no height limitations. The Project has a buildable area of 63,196.5 square-feet and proposes 292,820 square-feet of applicable floor space for a total FAR of 4.64. Height to the top of parapet is 88'-6", and 95'-0" to the top of elevator the wells.

Construction

Project construction would occur over approximately 18 months. The timeline and notes related to construction are presented in **Table II-3, Projected Construction Schedule**.

Table II-3
Projected Construction Schedule

| Phase | Duration | Notes |
|---------------------------------|-------------|---|
| Demolition and Site Preparation | 1 month | Removal of the existing buildings and paving will generate approximately 1,073 tons of debris. |
| Grading and Excavation | 1 month + | Grading and excavation for the subterranean parking levels will require the export of approximately 58,300 cubic yards of soil. |
| Construction | 14 months + | Includes site paving and landscaping. |
| Architectural Coatings | 1 month | |
| Source: CORBel Architects | | |

A Truck Haul Route Program will be required as part of the Project's Construction Traffic Management Program, which would be reviewed and approved as part of the City's permitting process. Construction debris and soil is intended to be hauled to the Azusa Land Reclamation landfill, located at 1211 West Gladstone in Azusa, CA, approximately 27 miles east of the project site. Trucks can travel east on 8th Street directly to the 110 Freeway or turn north on Vermont Avenue to the 101 Freeway.





Source: Corbel Architects, Dec.18, 2019.



Source: Corbel Architects, Dec.18, 2019.



South Elevation



East Elevation

Source: Corbel Architects, Dec.18, 2019.



West Elevation



North Elevation

Source: Corbel Architects, Dec.18, 2019.

III. SCEA CRITERIA AND TRANSIT PRIORITY PROJECT CONSISTENCY ANALYSIS

PROJECT CONSISTENCY WITH THE TRANSIT PRIORITY PROJECT CRITERIA

As discussed in Section I, SB 375 allows the City, acting as lead agency, to prepare a SCEA as the environmental CEQA Clearance for a qualifying TPP. The Proposed Project qualifies for a SCEA as it meets the following four qualifying criteria for an eligible project within the SCAG region (see Public Resources Code §21155 (a) and (b)):

- 1) Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2020-2045 RTP/SC;
- 2) Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
- 3) Provides a minimum net density of at least 20 units per acre; and
- 4) Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

Consistency with Criterion #1 – Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2020-2045 RTP/SC.

The SCAG 2020-2045 RTP/SCS identifies areas within the SCAG region where the strategies of the plan can best be realized; these are Priority Growth Areas (PGAs). PGAs include areas suitable for particular strategies and areas identified to already have crucial components for smart growth. These are Job Centers, TPAs (Transit Priority Areas), HQTAs, Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence. Infill urban development in PGAs facilitate “compact development that is less reliant on single-occupancy vehicles” which is key in reaching plan goals.³ The Project Site is in a PGA, within a TPA by definition (within ½ mile of a major transit stop), and located within an HQTA and NMA.⁴ The Proposed Project is a mixed-use development with 251 residential units and 25,000 square feet of commercial space, and 15,500 square-feet of office space with a residential density of 173 dwelling units per acre. The Project is consistent with general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2020-2045 RTP/SC, as it is a dense infill development in the urban core.

The Project is also consistent with the goals of the plan as detailed below in **Table III-1, Consistency with 2020-2045 RTP/SCS Goals and Guiding Principles.**

³ Connect SoCal (2020-2045), Chapter 3, Land Use Tools, Center Focused Placemaking, adopted September 3, 2020.

⁴ SCAG Regional Data Platform, Content Library, PGA, Sphere of Influence, HQTA (2045), NMA, and Job Centers feature layers accessed at:
[https://hub.scag.ca.gov/search?collection=Dataset&source=southern%20california%20association%20of%20governments%20\(scag\)&type=feature%20layer](https://hub.scag.ca.gov/search?collection=Dataset&source=southern%20california%20association%20of%20governments%20(scag)&type=feature%20layer), July 21, 2022

Table III-1
Consistency with 2020-2045 RTP/SCS Goals and Guiding Principles

| Goals and Guiding Principals | |
|---|---|
| Goal 1 Encourage regional economic prosperity and global competitiveness. | <i>Not Applicable.</i> This goal is directed towards actions SCAG and the City may take and does not apply to the Project. |
| Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods. | <i>Consistent.</i> Although this goal is directed toward actions SCAG, the City, or other agencies may take, the Project is compatible with this goal. Gains in mobility, accessibility, reliability, and travel safety are realized in part by reducing dependence on personal automobiles and enhancing public spaces to benefit other modes of transportation. The Project is mixed-use, providing residences and jobs in the same location, within a dense urban environment, and has opted to reduce onsite residential parking pursuant to the Density Bonus Law. The Project will attract tenants that can forgo personal auto use and opt for other modes of transport, including nearby transit. Encouraging a car-lite lifestyle will help retain mobility, accessibility, reliability, and travel safety without the need to create new auto-centric infrastructure. |
| Goal 3 Enhance the preservation, security, and resilience of the regional transportation system. | <i>Consistent.</i> Although this goal is directed toward SCAG, other agencies, and the City, the Project is opting to reduce onsite residential parking, which will encourage transit use amongst residents. Increasing the share of trips taken by transit, and increasing transit ridership are key in the preservation, security, and resilience of public transit. |
| Goal 4 Increase person and goods movement and travel choices within the transportation system. | <i>Consistent.</i> Although this goal is directed toward SCAG, other agencies, and the City, the Project will provide housing, office, and commercial uses within a dense urban location. Residents will be able to easily take advantage of alternate modes of transportation, including transit, that are accessible within a half mile of the Site. Encouraging transit use, walkability, and cycling at the project level will help increase travel choices within the larger transportation system. |
| Goal 5 Reduce greenhouse gas emissions and improve air quality | <i>Consistent.</i> The Project will provide housing, office, and commercial uses within a dense urban location, and help encourage prospective tenants to forgo personal auto use as their main form of transportation. The project both helps provide goods, services, and jobs where people live, and places people within an area where goods, services, and jobs are relatively abundant. This kind of dense, urban infill development helps reduce dependence on personal auto use which is the primary source of individual greenhouse gas emissions. In addition, multifamily residential buildings are overall more efficient than detached residential buildings in terms of energy use, and they contribute fewer greenhouse gas emissions per resident. |

| Goals and Guiding Principals | |
|---|--|
| Goal 6 Support healthy and equitable communities | <i>Consistent.</i> The Project will provide housing, office, and commercial uses within a dense urban location, and help encourage prospective tenants to forgo personal auto use as their main form of transportation. Reducing personal auto use reduces pollution and helps encourage greater adoption of alternative means of transportation, which are healthier and more equitable means of transport, as they do not rely on personal auto ownership and use. |
| Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network | <i>Consistent.</i> The Project will provide housing, office, and commercial uses within a dense urban location near several sources of transit. There are multiple transit options within 0.5 miles of the site. Los Angeles Metro bus route 66 runs along 8th Street with stops roughly every 2 to 3 blocks. North/south bus routes run on Irolo Street to the east (route 206) and Western Avenue to the west (bus route 207). The LADOT DASH Wilshire Center/Koreatown clockwise and counterclockwise routes also run on Western Avenue. Metro's rail service can be accessed from either the Wilshire/Western station or the Wilshire/Normandie station, both roughly 0.3 miles from the project site providing access to the Purple Line, and bus routes 720 and 20 both run on Wilshire Boulevard. Further from the site, bus route 18 is available on 6th Street, and route 28 on Olympic Boulevard. This type of transit-oriented mixed-use development helps encourage similar projects in the same locale, making the area richer in jobs and workforce, and a locus for regional development and transit opportunity. |
| Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel. | <i>Not Applicable.</i> This goal is directed toward SCAG, the City, and other agencies that are responsible for developing, maintaining, and improving the regional transportation system. |
| Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options | <i>Consistent.</i> The Project includes development of 251 residential units in addition to office and commercial uses. It will provide live/work units as well as studio, one and two-bedroom units, with 29 units income-restricted, within a transit-rich area. There are multiple transit options within 0.5 miles of the site. Los Angeles Metro bus route 66 runs along 8th Street with stops roughly every 2 to 3 blocks. North/south bus routes run on Irolo Street to the east (route 206) and Western Avenue to the west (bus route 207). The LADOT DASH Wilshire Center/Koreatown clockwise and counterclockwise routes also run on Western Avenue. Metro's rail service can be accessed from either the Wilshire/Western station or the Wilshire/Normandie station, both roughly 0.3 miles from the project site providing access to the Purple Line, and bus routes 720 and 20 both run on Wilshire Boulevard. Further from the site, bus route 18 is available on 6th Street, and route 28 on Olympic Boulevard. The Project also provides 204 bicycle parking spaces and has opted to |

| Goals and Guiding Principals | |
|--|---|
| | reduce residential auto parking spaces, encouraging adoption of car-lite lifestyles. |
| Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats | <i>Consistent.</i> The Project is an infill development that would not affect any natural or agricultural land or restoration of habitats. |
| Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets. | <i>Not Applicable.</i> This principle is directed toward SCAG, the City, and other agencies that are responsible for developing, maintaining, and improving the regional transportation system. |
| Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability, and safety, and that preserve the existing transportation system | <i>Not Applicable.</i> This principle is directed toward SCAG, the City, and other agencies that are responsible for developing, maintaining, and improving the regional transportation system. |
| Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities | <i>Compatible.</i> Although this principle is directed toward actions SCAG, the City, or other agencies may take, the Project is compatible with this goal as it is the type of development the principle seeks to encourage. |
| Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices | <i>Not Applicable.</i> This principle is directed toward SCAG, the City, and other agencies that are responsible for developing, maintaining, and improving the regional transportation system. |
| Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions | <i>Not Applicable.</i> This principle is directed toward SCAG, the City, and other agencies that are responsible for developing, maintaining, and improving the regional transportation system. |
| Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies | <i>Not Applicable.</i> This principle is directed toward SCAG that has the responsibility of monitoring the progress of Connect SoCal. |
| Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience | <i>Not Applicable.</i> This principle is directed toward SCAG, the City, and other agencies that have control over transportation investments |
| Source: SCAG, Connect SoCal, Chapter 1, Goals and Guiding Principles, adopted September 3, 2020. | |

Consistency with Criterion 2 – Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.

The Proposed Project building has approximately 292,820 square-feet of floor area (not including basement parking and areas open to the sky). Of that, 61,500 square feet is devoted to commercial floor space and 231,320 square feet to residential floor space, for a total of 79 percent devoted to residential use and 21 percent to commercial use. The Project is therefore consistent with this criteria.

Consistency with Criterion 3 – The Project includes a minimum net density of at least 20 units per acre. The Project includes 251 residential units on a 1.45 acre site, for a residential density of 173 dwelling units per acre. The Project is therefore consistent with this criteria.

Consistency with Criterion 4 – The Project Site is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

The Project Site is approximately 0.3 miles from both the Wilshire/Western and Wilshire/Normandie Metro rail stations, which provide access to the Purple Line. The Project is therefore consistent with this criteria.

IV. INCORPORATION OF FEASIBLE MITIGATION MEASURES, PERFORMANCE STANDARDS, AND CRITERIA FROM PRIOR APPLICABLE EIRS

Public Resources Code (PRC) Section 21155.2 requires that a Transit Priority Project (TPP) incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs if deemed applicable by the lead agency. The City has complied with PRC Section 21151.2 by assessing the applicability of all of the suggested mitigation measures in SCAG's 2020-2045 RTP/SCS Program EIR and the Wilshire Community Plan EIR (November 1999). Mitigation measures are not imposed if they are not applicable to the Project, or if an equally effective existing City Regulatory Compliance Measure (RCM), standard condition of approval, or other City regulation or Federal, State, or regional regulation, or mitigation measure tailored to the details of the Project, renders the mitigation measure unnecessary.

Wilshire Community Plan EIR

Community Plans serve as a focused General Plan land-use element for each of the City's 35 designated community areas. The Wilshire Community Plan EIR assessed the environmental impacts to land-use designation and zoning changes within the Wilshire Community, including implementation of a Transportation Improvement and Mitigation Program. The vast majority of mitigation measures (referred to as Mitigation Policies) in this EIR are not project-level mitigation measures, meaning they cannot be implemented by an individual project but are intended to be implemented by the City. The Wilshire Community Plan EIR was published on November 30, 1999, and the few mitigation measures that can be implemented at the project level have all been surpassed by more recent City, State, or Federal regulatory requirements, or have become standard practice. As such, there is no need to apply any of the few potentially applicable mitigation measures from the Wilshire Community Plan EIR to the Project, and no further discussion is warranted.

SCAG's 2020-2045 RTP/SCS Program EIR

The Mitigation Monitoring and Reporting Program for the 2020-2045 RTP/SCS Program EIR (SCAG MMRP) include programmatic mitigation measures to be implemented by SCAG and project-level mitigation measures that SCAG encourages local agencies to implement, as appropriate and feasible, as part of project-specific environmental review. The applicability, or lack thereof, of Project-level mitigation measures (PMM) are discussed in **Table IV-1, 2020-2045 RTP/SCS PEIR Mitigation Measures**.

Table IV-1
2020-2045 RTP/SCS PEIR Mitigation Measures

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
|---|--|
| AESTHETICS | |
| <p>PMM AES-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. e) Retain or replace trees bordering highways, so that clear-cutting is not evident. f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity. h) Use see-through safety barrier designs (e.g., railings rather than walls). <p>PMM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> | <p><i>Not Applicable.</i> PMM AES-1 through AES-3 are not applicable to the Project. SB 743 limits the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:</p> <ul style="list-style-type: none"> 1) The project is a residential, mixed-use residential, or employment center project, and 2) The project is located on an infill site within a TPA <p>As explained in Section III, Project Consistency with the Transit Priority Project Criteria, the Project is an infill mixed-use residential project within a TPA and therefore is exempt from environmental review of aesthetic impacts.</p> |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
|---|------------------------------|
| <ol style="list-style-type: none"> 1) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. 2) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. 3) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. 4) Design projects consistent with design guidelines of applicable general plans. 5) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. 6) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows: <ol style="list-style-type: none"> a) use transparent panels to preserve views where sound walls would block views from residences; b) use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; c) construct sound walls of materials whose color and texture complements the surrounding landscape and development; 7) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas. <p>PMM AES-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures</p> | |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
|---|---|
| <p>identified by the Lead Agency:</p> <ol style="list-style-type: none"> 1) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. 2) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. 3) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. 4) Use unidirectional lighting to avoid light trespass onto adjacent properties. 5) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. 6) Provide structural and/or vegetative screening from light-sensitive uses. 7) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. 8) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. 9) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. | |
| AGRICULTURE AND FORESTRY | |
| <p>PMM AG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ol style="list-style-type: none"> 1) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. 2) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. 3) Maintain and expand agricultural land protections such as urban growth boundaries. 4) Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, | <p><i>Not Applicable.</i> PMM AG-1 through AG-5 are not applicable to the Project as there is no farmland or timberland, nor zoning as such, at or near the Project Site, and no Williamson Act property at or near the Project Site.</p> |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
|---|------------------------------|
| <p>etc. that enhance the commercial viability of retained agricultural lands.</p> <ol style="list-style-type: none"> 5) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access. 6) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland. <p>PMM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <ol style="list-style-type: none"> 1) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. 2) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection. <p>PMM AG-3: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <ol style="list-style-type: none"> 1) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources. <p>PMM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <ol style="list-style-type: none"> 1) Design proposed projects to minimize, to the greatest extent feasible, the | |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
|--|--|
| <p>loss of the highest valued agricultural land.</p> <p>2) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.</p> <p>3) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.</p> <p>PMM AG-5: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <p>a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.</p> | |
| AIR QUALITY | |
| <p>PMM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> | <p><i>Not Necessary.</i> This mitigation measure is not necessary as the Air Quality and Greenhouse Gas Impact Analysis prepared by Envicom Corporation, August 2022 (Appendix A) has determined the Project would not generate pollutant emissions in excess of applicable significance thresholds and would not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation. This</p> |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
|---|---|
| <ol style="list-style-type: none"> 1) Minimize land disturbance. 2) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. 3) Cover trucks when hauling dirt. 4) Stabilize the surface of dirt piles if not removed immediately. 5) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. 6) Minimize unnecessary vehicular and machinery activities. 7) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. 8) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. 9) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. 10) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. 11) Ensure that all construction equipment is properly tuned and maintained. 12) Minimize idling time to 5 minutes—saves fuel and reduces emissions. 13) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. 14) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. 15) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off peak hours. Minimize obstruction of through traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites 16) As appropriate require that portable engines and portable engine-driven | <p>determination includes the recognition that the Project is subject to the following existing compliance measures that will be applied to the Project:</p> <p>Regulatory Compliance Measure RCM-AQ-1: Construction Period Air Quality (Demolition, Grading, and Construction Activities)</p> <ol style="list-style-type: none"> 1) All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD Rule 403. 2) The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. 3) All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 miles per hour), to prevent excessive amounts of dust. 4) All dirt/soil loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust. 5) All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. 6) General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. 7) Trucks having no current hauling activity shall not idle but be turned off. |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
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| <p>equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.</p> <p>17) Require projects within 500 feet of residences, hospitals, or schools to use Tier 4 equipment for all engines above 50 horsepower (hp) unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds.</p> | |
| BIOLOGICAL RESOURCES | |
| <p>PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ol style="list-style-type: none"> 1) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. 2) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: <ol style="list-style-type: none"> i) Impact minimization strategies ii) Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii) Use of in-kind mitigation bank credits iv) Funding of research and recovery efforts v) Habitat restoration vi) Establishment of conservation easements vii) Permanent dedication of in-kind habitat 3) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native | <p><i>Not Necessary.</i> This mitigation measure is not necessary as the Project is an urban infill developed located in a highly developed area of the City, and contains no native plant communities and no protected tree species. The Project will remove non-protected trees from the site and will be subject to an existing City RCM that will ensure any potential impacts to nesting birds will be reduced to less than significant levels.</p> <p>City Regulatory Compliance Measure RC-BIO-1: Nesting Birds</p> <ol style="list-style-type: none"> 1) Proposed project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the nesting bird season, which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86). 2) If project activities cannot feasibly avoid the nesting bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall: <ol style="list-style-type: none"> a) Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting nesting bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work. b) If a nesting bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of |

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| <p>plants, and/or pay in lieu fees to support off-site long-term conservation strategies.</p> <p>4) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.</p> <p>5) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.</p> <p>6) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.</p> <p>7) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.</p> <p>8) Appoint a qualified biologist to monitor implementation of mitigation measures.</p> <p>9) Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.</p> <p>10) Develop an invasive species control plan associated with project construction.</p> <p>11) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.</p> <p>12) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.</p> <p>13) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.</p> | <p>suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.</p> <p>c) Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Qualified Biological Monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.</p> <p>d) The Qualified Biologist shall record the results of the recommended protective measures described above to document compliance with applicable state and federal laws pertaining to the protection of nesting birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.</p> |

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| <p>PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ol style="list-style-type: none"> 1) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA. 2) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. 3) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. 4) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds. 5) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season. 6) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities. 7) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. 8) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate | <p><i>Not Applicable.</i> This mitigation measure is not applicable as there are no riparian or other sensitive natural communities on or near the Project Site as discussed in Section V, Part IV.</p> |

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| <p>compensatory mitigation, where required.</p> <ol style="list-style-type: none"> 9) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities. 10) Appoint a qualified wetland biologist to monitor implementation of mitigation measures. 11) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. 12) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects. 13) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan. 14) Install fencing and/or mark sensitive habitat to be avoided during construction activities. 15) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. 16) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist. 17) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). 18) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt- catching devices, and using settling basins to minimize soil transport. | |

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| <p>PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.</p> <ol style="list-style-type: none"> 1) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible. 2) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW. 3) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE’s Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration’s performance standard of “no net loss of wetlands” a USACE permit may require a project proponent to restore, establish, enhance, or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: <ul style="list-style-type: none"> -- Permittee-responsible mitigation | <p><i>Not Applicable.</i> This mitigation measure is not applicable as there are no wetlands on or near the Project Site as discussed in Section V, Part IV.</p> |

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| <ul style="list-style-type: none"> -- Contribution of in-kind in-lieu fees -- Use of in-kind mitigation bank credits -- Where avoidance is determined to be infeasible and <p>4) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:</p> <ul style="list-style-type: none"> -- Avoidance -- Impact Minimization -- On-site alternatives -- Off-site alternatives <p>5) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.</p> | |
| <p>PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ol style="list-style-type: none"> 1) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. 2) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. 3) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. 4) Conduct a survey to identify active raptor and other migratory | <p><i>Not Applicable.</i> This mitigation measure is not applicable as there are no wildlife corridors on or near the Project Site as discussed in Section V, Part IV.</p> |

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| <p>nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.</p> <ol style="list-style-type: none"> 5) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. 6) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. 7) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors. 8) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. 9) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor. 10) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation. 11) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). 12) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. 13) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation. 14) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. 15) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to | |

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| <p>mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:</p> <ul style="list-style-type: none"> -- Wildlife movement buffer zones -- Corridor realignment -- Appropriately spaced breaks in center barriers -- Stream rerouting -- Culverts -- Creation of artificial movement corridors such as freeway under- or overpasses -- Other comparable measures <p>16) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.</p> | |
| <p>PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ol style="list-style-type: none"> 1) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. 2) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. 3) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist. 4) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the Project does not conflict with any local policies or ordinances protecting biological resources as discussed in Section V, Part IV</p> |

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| <p>resources not permitted for impact. Before the start of any clearing, excavation, construction, or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.</p> <p>5) Establish a scheme for the removal and disposal of logs, brush, earth, and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.</p> <p>6) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.</p> <p>7) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.</p> <p>8) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources</p> | |

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| <p>9) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:</p> <ul style="list-style-type: none"> -- Avoidance strategies -- Contribution of in-lieu fees -- Planting of replacement trees -- Re-landscaping areas with native vegetation post-construction -- Other comparable measures developed in consultation with local agency and certified arborist. | |
| <p>PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ol style="list-style-type: none"> 1) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. 2) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. 3) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable. | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the Project does not affect any Habitat Conservation Plans or Natural Community Conservation Plans as discussed in Section V, Part IV.</p> |
| CULTURAL RESOURCES | |
| <p>PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> | <p><i>Not Necessary.</i> This mitigation measure is not necessary as a record search of previous historical and archeological investigations, and NAHC records, has been conducted for the Project Site, the existing structures have been assessed by a qualified architectural historian, and the Site has been assessed by a qualified archaeologist, as detailed in item Section V, Part V. It was determined no historical resources are present. As there is a potential for buried historical resources MM-CR-1 is applied:</p> |

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| <p>a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified. b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center. c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.</p> <p>b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.</p> <p>c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:</p> <ul style="list-style-type: none"> -- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the | <p>MM CR-1: Archaeological Monitoring</p> <p>An archaeological monitor that meets the Secretary of Interior qualifications will be on site during removal of property pavement and grading of the top 5 feet of soil. The purpose of having an archaeologist on site is to assess if any significant cultural resources are buried below existing surface features. If such features or artifact concentrations are identified, then the project "discovery" protocol will be followed:</p> <ul style="list-style-type: none"> a) The archaeological monitor will collect any historic material that is uncovered through demolition of the pavement or grading that is within a disturbed context, and can halt construction within 50-feet of a potentially significant cultural resource if necessary. Artifacts collected from a disturbed context or that do not warrant additional assessment can be collected without the need to halt grading. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the monitor's daily Monitoring Report. However, if foundations, privies, or other older historic features are encountered, the project "discovery" protocol should be followed. b) A final project Monitoring Report will be produced that discusses all monitoring activities and all artifacts recovered and features identified through monitoring of the demolition and grading of the project site. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the Monitoring Report. All artifacts recovered that are important, with diagnostic or location information that may be of importance to California and Los Angeles City history, will be cleaned, analyzed, and described within the Monitoring Report. All materials will be curated at an appropriate depository. If important materials are found during monitoring, a Curation Plan will be needed that is reviewed by the Lead Agency prior to the publication of the Monitoring Report c) If potentially significant intact deposits are encountered that are within an undisturbed context, then a cultural resource "discovery" protocol will be followed. If older historic (or prehistoric) features, artifact concentrations, or larger significant artifacts are encountered during demolition or grading within the first five feet, then all work in that area shall be halted or diverted away from the discovery to a |

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| <p>maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.</p> <p>-- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.</p> <p>d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.</p> <p>e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.</p> <p>f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.</p> <p>g) Contact the NAHC to request a Sacred Lands File search and a list of</p> | <p>distance of 50-feet until a qualified senior archaeologist can evaluate the nature and/or significance of the find(s). If the senior archaeologist (not the field monitor) confirms that the discovery is potentially significant, then the Lead Agency will be contacted and informed of the discovery.</p> <p>d) Construction will not resume in the locality of the discovery until consultation between the senior archaeologist, the owner's project manager, the Lead Agency, and all other concerned parties, takes place and reaches a conclusion approved by the Lead Agency. If a significant cultural resource is discovered during earth-moving, complete avoidance of the find is preferred. However, if the discovery cannot be avoided, further survey work, evaluation tasks, or data recovery of the significant resource may be required by the Lead Agency. The Lead Agency may also require changes to the Monitoring Plan, based on the discovery. All costs for the additional monitoring, discovery assessment, discovery evaluation, or data recovery of will be the responsibility of the applicant, within the cost parameters outlined under CEQA. All individual reports, including the final project Monitoring Report, will be submitted to the SCCIC at the conclusion of the project.</p> <p>Additionally, RCM-CR-1 is applied to account for potential resources found below the first five feet of soil:</p> <p>Regulatory Compliance Measure RCM-CR-1 (Archaeological)</p> <p>If archaeological resources (sites, features, artifacts, or fossilized material) are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance and nature of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing or data recovery may be warranted. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in</p> |

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| <p>relevant Native American contacts who may have additional information.</p> <p>h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.</p> <p>i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant;</p> | <p>accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.</p> |

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| <p>this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.</p> <p>j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS.</p> <p>k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.</p> <p>l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.</p> | |
| <p>PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> | <p><i>Not Necessary.</i> This mitigation measure is not necessary as the Project is subject to existing requirements equal to or more effective than PMM CULT-2. The Project is subject to the following Regulatory Compliance Measure which will ensure impacts are less than significant:</p> <p>City Regulatory Compliance Measure RC-CR-4 (Human Remains):</p> |

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| <p>a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.</p> <p>b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional:</p> <ul style="list-style-type: none"> -- Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available. -- If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance. | <p>If human remains are encountered unexpectedly during construction, demolition, and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:</p> <ol style="list-style-type: none"> 1) Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays) 2) If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). 3) The NAHC will immediately notify the person it believes to be the most likely descendent (MLD) of the deceased Native American. 4) The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC. |
| ENERGY | |
| There are no project mitigation measures related to Energy. | |
| GEOLOGY AND SOILS | |
| <p>PMM GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources [sic], as applicable and feasible. Such</p> | <p><i>Not Necessary.</i> This mitigation measure is not necessary as a geotechnical investigation has been performed and approved by the City; a SWPPP is required as part of the construction plans; there are no vegetated slopes or road cuts near the Project Site and per LID requirements the Project will be</p> |

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| <p>measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils. | <p>required to capture and/or treat runoff generated by a 24-hour 0.75 inch rainfall event or 85th percentile event, whichever is greater, thereby avoiding runoff for most rain events, and; there are no wells near the Project Site. These details are discussed in Section V, Parts VIII and X.</p> |
| <p>PMM GEO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities | <p><i>Not Necessary.</i> This mitigation measure is not necessary as a mitigation measure is applied to the Project in response to the Geotechnical Investigation which is more effective than PMM GEO-2. As discussed in Section V, Part VII, MM GEO-1 is applied to the Project which requires the following:</p> <p>Mitigation Measure GEO-1 (Paleontological Resources)</p> <ul style="list-style-type: none"> a) Prior to grading or excavation a qualified paleontologist shall attend |

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| <p>Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.</p> <p>b) Obtain review by a qualified paleontologist (e.g., who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.</p> <p>c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.</p> <p>d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:</p> <ol style="list-style-type: none"> 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. 2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are being identified nearby within the same sedimentary deposits that occur at the Project Site. As with all development in the City that includes any ground-disturbing activities, the Applicant would be required to comply with the City's standard | <p>preconstruction meetings to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. In addition, all on-site construction personnel shall receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work.</p> <p>b) During grading and excavation a qualified paleontological monitor will be on site during grading below five (5)-feet in depth and all ground-disturbing activities associated with project construction occurring within previously undisturbed fossil bearing formations. If fossils are discovered, the paleontological monitor shall recover them. In most cases, this fossil salvage can be completed in a short period of time; however, some fossil specimens, such as a complete large mammal skeleton, may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. Fossils collected from a disturbed context or that do not warrant additional assessment can be collected, without the need to halt grading.</p> <p>c) Fossil remains collected during the monitoring and salvage portion of the program shall be cleaned, repaired, sorted, and catalogued. A final data recovery report shall be completed that outlines the results of the monitoring program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.</p> <p>d) The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology – USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum – who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.</p> <p>e) The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.</p> <p>f) The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.</p> <p>g) Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.</p> <p>h) Prior to the issuance of any building permit, the applicant shall</p> |

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| <p>practices related to the inadvertent discovery of subsurface resources. If paleontological resources are encountered, the Applicant would be required to notify the Department of Building and Safety immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 5097.5. Thus, incorporation of this mitigation measure is not required. 6521 S. Sepulveda Boulevard Project PAGE 4-32 City of Los Angeles Sustainable Communities Environmental Assessment March 2022 Table 4-1 Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures Impacts and Mitigation Measure Applicability to the Project encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.</p> <ol style="list-style-type: none"> 3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. 4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas. <ol style="list-style-type: none"> e) Avoid routes and project designs that would permanently alter unique geological features. f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the | <p>submit a letter to the case file indicating that no material was discovered.</p> <ol style="list-style-type: none"> i) A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit. |

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| <p>paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.</p> | |
| GREENHOUSE GAS EMISSIONS | |
| <p>PMM GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: <ul style="list-style-type: none"> i Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Prohibit gas-powered landscape maintenance equipment. ix. Install electric vehicle charging stations. x. Reduce wood burning stoves or fireplaces. xi. Provide bike lanes accessibility and parking at residential developments. b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions. d) Measures that consider incorporation of Best Available Control | <p><i>Not Necessary.</i> This mitigation measure is not necessary as the Project's generation of GHG emissions would not be considered cumulatively considerable, as the Project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions as detailed in Section V, Part VI.</p> |

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| <p>Technology (BACT) during design, construction, and operation of projects to minimize GHG emissions, including but not limited to:</p> <ul style="list-style-type: none"> i. Use energy and fuel-efficient vehicles and equipment; ii. Deployment of zero- and/or near zero emission technologies; iii. Use lighting systems that are energy efficient, such as LED technology; iv. Use the minimum feasible amount of GHG-emitting construction materials; v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii. Incorporate design measures to reduce water consumption; ix. Use lighter-colored pavement where feasible; x. Recycle construction debris to maximum extent feasible; xi. Plant shade trees in or near construction projects where feasible; and xii. Solicit bids that include concepts listed above. <p>e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:</p> <ul style="list-style-type: none"> i. Promote transit-active transportation coordinated strategies; ii. Increase bicycle carrying capacity on transit and rail vehicles; iii. Improve or increase access to transit; iv. Increase access to common goods and services, such as groceries, schools, and day care; v. Incorporate affordable housing into the project; vi. Incorporate the neighborhood electric vehicle network; vii. Orient the project toward transit, bicycle, and pedestrian facilities; viii. Improve pedestrian or bicycle networks, or transit service; ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply; xii. Unbundle parking costs; xiii. Provide parking cash-out programs; | |

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| <p>xiv. Implement or provide access to commute reduction program;</p> <p>f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:</p> <ul style="list-style-type: none"> i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi. Provide employee transportation coordinators at employment sites; vii. Provide a guaranteed ride home service to users of non-auto modes. <p>i) Designate a percentage of parking spaces for ride-sharing vehicles or high occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;</p> <p>j) Land use siting and design measures that reduce GHG emissions, including:</p> <ul style="list-style-type: none"> i. Developing on infill and brownfields sites; ii. Building compact and mixed-use developments near transit; iii. Retaining on-site mature trees and vegetation, and planting new canopy trees; iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, <p>6521 S. Sepulveda Boulevard Project PAGE 4-36 City of Los Angeles Sustainable Communities Environmental Assessment March 2022 Table 4-1 Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures Impacts and Mitigation Measure Applicability to the Project including constructing or encouraging</p> | |

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| <p>construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.</p> <p>k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.</p> | |
| HAZARDS AND HAZARDOUS MATERIALS | |
| <p>PMM HAZ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.</p> <p>b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.</p> <p>c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:</p> <p>-- The types of hazardous materials or chemicals stored and/or used on-</p> | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the Project does not include or propose the routine use or transport of considerable quantities of hazardous materials as discussed in Section V, Part IX.</p> |

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| <p>site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.</p> <ul style="list-style-type: none"> -- The location of such hazardous materials. -- An emergency response plan including employee training information. -- A plan that describes the way these materials are handled, transported, and disposed. <p>d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.</p> <p>e) Avoid overtopping construction equipment fuel gas tanks.</p> <p>f) Properly contain and remove grease and oils during routine maintenance of construction equipment.</p> <p>g) Properly dispose of discarded containers of fuels and other chemicals.</p> <p>h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.</p> <p>i) Identify and implement more stringent tank car safety standards.</p> <p>j) Improve rail transportation route analysis, and modification of routes based on that analysis.</p> <p>k) Use the best available inspection equipment and protocols and implement positive train control.</p> <p>l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.</p> <p>m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.</p> <p>n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.</p> <p>o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.</p> <p>p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.</p> <p>q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.</p> | |
| <p>PMM HAZ-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the</p> | <p>Not applicable, see response to PMM HAZ-1.</p> |

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| <p>reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:</p> <ul style="list-style-type: none"> a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; and f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident; h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials. | |
| <p>PMM HAZ-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials. | <p>Not applicable, see response to PMM HAZ-1.</p> |
| <p>PMM HAZ-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project</p> | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the Project Site is not included on the Cortese List, as discussed in Section V, Part IX.</p> |

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| <p>can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. | |

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| <ul style="list-style-type: none"> g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. | |

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| <ul style="list-style-type: none"> m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations. n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. | |
| <p>PMM HAZ-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; and | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the Project will not interfere with an emergency plan as discussed in Section V, Part IX. In addition, this mitigation measure is not applicable at the project level and is directed toward municipalities with control over transportation systems and policies.</p> |

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| c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation. | |
| HYDROLOGY AND WATER QUALITY | |
| <p>PMM HYD-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. | <p><i>Not Necessary.</i> This mitigation measure is not necessary as the Project is subject to the City's LID requirements which are equal to or more effective than PMM HYD-1 as detailed in Section V, Part X.</p> |

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| <ul style="list-style-type: none"> j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long term sediment control and drainage of roadway runoff. k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of way acquisition process. l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate, and manage stormwater runoff flows in all new developments, where practical and feasible. | |
| <p>PMM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. b) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation. c) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. | <p><i>Not Necessary.</i> This mitigation measure is not necessary as the Project has been determined to not violate water quality standards or waste discharge requirements, and is subject to existing requirements equal to or more effective than PMM HYD-2 in protecting surface and groundwater quality as detailed in Section V, Part X.</p> |

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| <p>d) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.</p> <p>PMM HYD-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.</p> | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the project is not within an area subject to alluvial fan flooding.</p> |
| LAND USE AND PLANNING | |
| <p>PMM LU-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Facilitate good design for land use projects that build upon and improve existing circulation patterns.</p> <p>b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:</p> <ul style="list-style-type: none"> -- Selecting alignments within or adjacent to existing public rights of way. -- Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. -- Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). <p>c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:</p> | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the Project does not involve the development of any new roadway facilities and otherwise does not divide a community as it is an urban infill development on a 1.45 acre site, surrounded by urban development.</p> |

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| <ul style="list-style-type: none"> -- Alignment shifts to minimize the area affected. -- Reduction of the proposed right-of-way take to minimize the overall area of impact. -- Provisions for bicycle, pedestrian, and vehicle access across improved roadways. | |
| <p>PMM LU-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation. | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the Project is not inconsistent with adopted general plan policy or land use regulation adopted for the purpose of avoiding or mitigating an impact as discussed in Section V, Part XI.</p> |
| MINERAL RESOURCES | |
| <p>PMM MIN-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation, and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as: <ul style="list-style-type: none"> 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the urban infill Project is not located on a site with known mineral resources as discussed in Section V, XII. The Project also must meet the requirements of LAMC Section 99.04.408.1, which addresses the diversion goals of AB 939, and requires construction and demolition waste to be handled by certified Construction and Demolition waste processors for diversion of at least 50% of construction waste. Concrete, asphalt, brick, dirt, mixed inert materials, green waste and wood waste, gypsum/wallboard, and scrap metal are all recyclable materials that are reused post-construction.</p> |

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| <p>materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.</p> <p>3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.</p> <p>4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of Mineral Resource Zone (MRZ-2) areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.</p> | |
| NOISE | |
| <p>PMM NOISE-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible [sic]. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance. d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. | <p><i>Not Necessary.</i> This mitigation measure is not necessary as regulatory compliance and additional mitigation measures are applied to the Project which in effect are equal to or more effective than PMM NOISE-1. As discussed in the Noise Study prepared by Envicom Corporation, July 2019 (Appendix J), and reiterated in Section V, Part XIII.a, the project is required to comply with the following regulatory compliance measures:</p> <ul style="list-style-type: none"> • LAMC Section 41.40 and Section 112.05, which regulate noise from construction activities (e.g., construction activities will be prohibited between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, and between 6:00 p.m. and 8:00 a.m. on any Saturday or national holiday or at any time on Sunday) and noise levels from equipment (e.g., noise level limit of 75 dBA at a distance of 50 feet for powered equipment or tools unless technically infeasible); • LAMC Section 112.02, which require that any heating, ventilation, and air conditioning (HVAC) system within any zone of the City not cause an increase in ambient noise levels by more than 5 dBA on any other occupied property. <p>In addition to the above regulatory compliance measures, and as discussed in Section V, Part XIII.a, MM NOI-1 through NOI-3 are applied to the Project which will ensure construction noise is reduced to a less-than-significant</p> |

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| <ul style="list-style-type: none"> f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where repavement is planned. l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant. m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses. n) Monitor the effectiveness of noise reduction measures by taking noise | <p>level:</p> <p>MM NOI-1 (Construction Equipment)</p> <ol style="list-style-type: none"> 1. All construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. 2. Pneumatic tools used at the site shall be equipped with an exhaust muffler on the compressed air exhaust to minimize noise levels. 3. Back-up beepers for all construction equipment and vehicles shall be broadband sound alarms or adjusted to the lowest noise levels possible, provided that Occupational Safety and Health Administration (OSHA) and California OSHA safety requirements are not violated. On vehicles where back-up beepers are not available, alternative safety measures such as escorts and spotters will be employed. <p>MM NOI-2 (Enclosures or Barriers)</p> <p>Enclosures or barriers shall be placed around concrete saws and generators when they operate on site. Alternatively, a temporary noise control barrier shall be installed on the northern property line of the construction site's abutting residential uses. The enclosures or barrier(s) shall be designed to reduce noise levels from each individual piece of equipment to the performance standard of 75 dBA Leq at a distance of 50 feet from the equipment to the extent feasible. Such barriers could include a minimum 8-foot-high temporary barrier with a minimum sound transmission (STC) rating of 26, erected along the northern property line. This barrier could be constructed in one of the following ways:</p> <ol style="list-style-type: none"> 1. From acoustical blankets hung over or from a supporting frame. The blankets shall be firmly secured to the framework. The blankets shall be overlapped by at least 4 inches at seams and taped and/or closed with hook-and-loop fasteners (i.e., Velcro®) so that no gaps exist. The largest blankets available shall be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier. 2. From commercially available acoustical panels lined with sound- |

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| <p>measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.</p> <ul style="list-style-type: none"> o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. q) Use of portable barriers in the vicinity of sensitive receptors during construction. r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts. s) Monitor the effectiveness of noise attenuation measures by taking noise measurements. t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities. u) Construct sound reducing barriers between noise sources and noise sensitive land uses. v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible. | <p>absorbing material (the sound-absorptive faces of the panels should face the construction equipment).</p> <ul style="list-style-type: none"> 3. From common construction materials such as plywood provided that the barrier is designed with overlapping material at the seams to assure that no gaps exist between the panels. <p>MM NOI-3 (Noticing)</p> <ul style="list-style-type: none"> 1. The construction management company's name and telephone number(s) shall be posted at a least one location along each street frontage that borders the project site. 2. A designated point of contact shall be identified to address noise-related complaints during construction. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler) and will be required to implement reasonable measures such that the complaint is resolved. |
| <p>PMM NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce</p> | <p><i>Not Necessary.</i> This mitigation measure is not necessary as the Noise Study prepared by Envicom Corporation, July 2019 (Appendix J), and as discussed in Section V, Part XIII, has determined the Project would not generate</p> |

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| <p>substantial adverse effects related to violating air quality standards, as applicable and feasible [sic]. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors. | <p>vibration in excess of applicable significance thresholds.</p> <p>Construction of the project would not require high-impact construction methods such as pile driving or blasting. As such, ground borne vibration during project construction would be generated from conventional heavy construction equipment, such as bulldozers and excavators. Even with the use of large, full-size mobile equipment at the project site, the Noise Study determined the Project would not generate vibration that would exceed the applicable vibration criteria for building damage or human annoyance at the nearest surrounding existing structures. As such, off-site receptors located in proximity to the project site would not be exposed to excessive ground borne vibration levels during project construction. Thus, no mitigation would need to be implemented regarding groundborne vibration during project construction.</p> |
| <p>Impact NOISE-3: 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.</p> <p>Project Level Mitigation Measures: See PMM NOISE-1.</p> | <p><i>Not Necessary.</i> As explained in Section V, Part XIII.a, the project is neither located within an airport land use plan nor within two miles of a public use airport that would expose people residing or working in the Project area to excessive noise levels.</p> |
| POPULATION AND HOUSING | |
| <p>PMM POP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the</p> | <p><i>Not Applicable.</i> This mitigation measure is not applicable to the Project as it concerns displacement via transportation projects. It is noted that the Project will require removal of one single family house but will construct 251 new apartment units including 29 income-restricted units.</p> |

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| <p>following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan. | |
| PUBLIC SERVICES | |
| <p>PMM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 1) Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated into the project description. 2) Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. 3) Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while | <p><i>Not Necessary.</i> This mitigation measure is not necessary as it has been determined the Project will not result in inadequate emergency service levels as discussed in Section V, Part XV, and the Project will be required to receive approval for a temporary traffic control plans from the Los Angeles Department of Transportation (LADOT) for any construction related traffic disruptions.</p> |

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| <p>maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.</p> | |
| <p>PMM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable. | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the Project will be required to pay school fees, which are deemed to fully avoid direct impacts under CEQA (California Government Code 65996(a)).</p> |
| <p>PMM PSL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts. | <p><i>Not Applicable.</i> This mitigation measure is not applicable as it has been determined the Project will not require an expansion of library facilities as discussed in Section V, Part XV.</p> |
| RECREATION | |
| <p>PMM REC-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing | <p><i>Not Necessary.</i> This mitigation measure is not necessary as it has been determined the Project will not significantly impact existing recreational facilities and will be required to pay Quimby fees, as discussed in Section V, Part XVI.</p> |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
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| <p>facilities, using strategies such as:</p> <ul style="list-style-type: none"> i. Increasing the accessibility to natural areas for outdoor recreation. ii. Utilizing “green” development techniques. iii. Promoting water-efficient land use and development. iv. Encouraging multiple uses, such as the joint use of schools. v. Including trail systems and trail segments in General Plan recreation standards. | |
| TRANSPORTATION | |
| <p>PMM TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>1) Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration’s publication: Integrating Demand Management into the Transportation Planning Process. A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region’s roadways:</p> <ul style="list-style-type: none"> -- include TDM mitigation requirements for new developments; -- incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; -- provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road, and parking pricing; -- implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; -- develop TDM-specific performance measures to evaluate project specific and system-wide performance; -- incorporate TDM performance measures in the decision-making process for identifying transportation investments; -- implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and -- set aside funding for TDM initiatives. | <p><i>Not Necessary.</i> This mitigation measure is not applicable as it is primarily directed toward municipalities and agencies that are responsible for the development of transportation policy and regulation. Furthermore, a VMT study was conducted for the Project and determined there would be no significant VMT impacts, as discussed in Section V, Part XVII.</p> |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
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| <ul style="list-style-type: none"> -- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis. | |
| <p>PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: <ul style="list-style-type: none"> -- Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. -- Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. -- Scheduling of truck trips outside of peak morning and evening commute hours. -- Limiting of lane closures during peak hours to the extent possible. -- Usage of haul routes minimizing truck traffic on local roadways to the extent possible. -- Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. -- Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for | <p><i>Not Necessary.</i> This mitigation measure is not necessary as the Project is subject to existing requirements equal to or more effective than PMM TRA-2, as the Project must receive approval prior to permitting for a temporary traffic control plan from the LADOT for any construction related traffic disruptions, and prior to permitting must receive approval for truck haul routes and location of equipment and material staging from the Department of Building and Safety (LADBS).</p> |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
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| <p>Construction and Maintenance Work Zones.</p> <ul style="list-style-type: none"> -- Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. -- Storage of construction materials only in designated areas. -- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. -- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: <ul style="list-style-type: none"> a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. -- Enhance emergency preparedness awareness among public agencies and with the public at large. | |
| TRIBAL CULTURAL RESOURCES | |
| <p>PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria; b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource; c) Permanent conservation easements or other interests in real property, | <p><i>Not Necessary.</i> This mitigation measure is not necessary as a mitigation measure is applied to the Project which is more effective than PMM TCR-1. As discussed in Section V, Part XVIII.b MM TCR-1 is applied to the Project which requires the following:</p> <p>MM TCR-1: Tribal Cultural Resource Archaeological Monitoring</p> <p>The applicant shall retain an archaeological monitor that meets the Secretary of Interior qualifications will be on site during removal of the property pavement and grading of the first 5 feet of soil. The frequency of monitoring shall be determined by the archaeological monitor based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus fill soils), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered.</p> <ol style="list-style-type: none"> 1. In the event that archaeological resources are unearthed during ground-disturbing activities the Project Permittee shall immediately |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
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| <p>with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.</p> | <p>stop all ground disturbance activities and contact the following:</p> <ol style="list-style-type: none"> a. All California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; and, b. The Department of City Planning at 213.978.1454. <ol style="list-style-type: none"> 2. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Project permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. 3. The Project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the Project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible. 4. The Project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City. 5. If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation. 6. The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate. 7. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. |

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| | <p>8. Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code.</p> |
| UTILITIES AND SERVICE SYSTEMS | |
| <p>PMM USSW-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:</p> <ul style="list-style-type: none"> a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Inclusion of a waste management plan that promotes maximum C&D diversion. c) Source reduction through <ul style="list-style-type: none"> (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects. e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric | <p><i>Not Necessary.</i> This mitigation measure is not necessary as the Project is subject to existing requirements equal to or more effective than PMM USSW-2. Statewide source reduction and recycling requirements of AB 939 are implemented by the City through LA Sanitation collection services and regulation and monitoring of landfill waste haulers resulting in a landfill diversion rate of 76.4% according to the Zero Waste Progress Report 2013 conducted by the UCLA Engineering Extension's Municipal Solid Waste Management Program. Analysis of solid waste generation is discussed in Section V, Part XIX.</p> |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
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| <p>rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.</p> <ul style="list-style-type: none"> h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction, and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional, and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services. | |
| <p>PMM USWW-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 2) During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure | <p><i>Not Applicable.</i> This mitigation measure is not applicable as Pursuant to the City Sewer Allocation Ordinance (No. 166060), in order to avoid prematurely committing treatment capacity to projects still in the environmental review or entitlement process, LA Sanitation does not determine sewer capacity availability for a proposed project until the LADBS has established that a project's plans and specifications are acceptable for plan check. This process ensures that the system can accept the anticipated wastewater flows from a project at the time of connection. However, based on current capacity and flow rates at Hyperion Water Reclamation Plant, the LA Sanitation wastewater treatment system would have sufficient capacity for the Project's wastewater in addition to the existing treatment commitments.</p> |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
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| <p>improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.</p> | |
| <p>PMM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for nonpotable uses onsite. | <p><i>Not Necessary.</i> This mitigation measure is not necessary as the Project is subject to existing requirements equal to or more effective than PMM USWS-1. The State Model Water Efficiency Landscape Ordinance, implemented through the City's Landscape Ordinance requires to the extent feasible, all projects shall use water conserving plants and techniques in landscape design, and especially water conserving native plants, and the maximum water needs for landscaping is confined to a strict water budget set by the City. In addition, the High Efficiency Plumbing Fixture Ordinance and Citywide Water Efficiency Standards Ordinance mandate new water-using fixtures meet efficiency requirements and building and landscape design integrate water saving systems and technology.</p> |
| WILDFIRE | |
| <p>PMM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk [sic], as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the Project is not in an area that is at risk of wildfire or within the ember zone of an area that is susceptible to wildfire.</p> |

| 2020-2045 RTP/SCS PEIR Mitigation Measure | Applicability to the Project |
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| <p>ignition.</p> <ul style="list-style-type: none"> b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place. c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place. | |
| <p>PMM WF-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk [sic], as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to: <ul style="list-style-type: none"> -- Submit a fire protection plan including the designation of fire watch staff; -- Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; -- Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and -- Designate trained fire watch staff during project construction to reduce risk of fire hazards. | <p><i>Not Applicable.</i> This mitigation measure is not applicable as the Project is not located in or near a very high hazard severity zones or SRA.</p> |

V. INITIAL STUDY/SCEA IMPACT ANALYSIS

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.

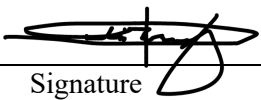
- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

| | |
|--------------------------|--|
| <input type="checkbox"/> | I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. |
| <input type="checkbox"/> | 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 in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. |
| <input type="checkbox"/> | I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. |
| <input type="checkbox"/> | I find that 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 the 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. |

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| <input type="checkbox"/> | 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. Therefore, an EIR Addendum will be prepared. |
| <input checked="" type="checkbox"/> | I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified "residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because the SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project. |

| | | |
|---------------------|-----------|--|
| Envicom Corporation | 11/8/2022 | Chi Dang, City Planner, City of Los Angeles |
| Prepared By | Date | Reviewed By |
| Chi Dang | 11/8/2022 |  |
| Printed Name | Date | Signature |

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------------|--|------------------------------------|-------------------------------------|
| I. AESTHETICS. | | | | |
| 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, or other locally recognized desirable aesthetic natural feature within a city-designated 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 points). 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Analysis

On September 2013, the Governor signed into law SB 743, which instituted changes to CEQA when evaluating environmental impacts to projects located in areas served by transit. SB 743 limits the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

- 1) The project is a residential, mixed-use residential, or employment center project, and
- 2) The project is located on an infill site within a TPA.

Section 21099 (a) of the PRC provides definitions for terms related to analysis of Transit-Oriented Infill Projects, including the following:

- 1) "Employment center project" means a project located on property zoned for commercial uses with a FAR of no less than 0.75 and that is located within a TPA.
- 2) "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

- 3) “TPA” means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.

The City’s Zoning Information (ZI) File 2452 reiterates the provisions of SB 743 and PRC Section 21099,⁵ noting that visual resources, aesthetic character, shade, and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined by the City shall not be considered an impact for infill projects within TPAs pursuant to CEQA.

- a. No Impact.** Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?

The Project Site is located within a TPA, as it is located within 0.5 miles of the Wilshire/Western Metro Station and Wilshire/Normandie Metro Station, existing major transit stops. The City’s Zone Information and Map Access System (ZIMAS) also indicates that the Project Site is located within a TPA.⁶ The Project proposes to redevelop the infill Project Site within a highly urbanized area of the City by replacing existing commercial use structures with an eight-story mixed-use building with commercial, office and residential features. The Project Site is surrounded by existing urban uses, including commercial, residential, and mixed-use developments. As the Project proposes to develop a mixed-use project on the infill Project Site within a TPA, pursuant to the provisions of SB 743 and the City’s ZI File 2452, aesthetic and parking impacts are not considered significant impacts on the environment in this evaluation, and therefore a detailed aesthetics analysis is not appropriate for this CEQA document. Therefore, there would be no impacts.

Mitigation Measures: No mitigation measures are required.

- b. No Impact.** Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?

The Project Site is located within a TPA, as it is located within 0.5 miles of the Wilshire/Western Metro Station and Wilshire/Normandie Metro Station, existing major transit stops. The City’s Zone Information and Map Access System (ZIMAS) also indicates that the Project Site is located within a TPA. The Project proposes to redevelop the infill Project Site within a highly urbanized area of the City by replacing existing commercial use structures with an eight-story mixed-use building with commercial, office and residential features. The Project Site is surrounded by existing urban uses, including commercial, residential, and mixed-use developments. As the Project proposes to develop a mixed-use project on the infill Project Site within a TPA, pursuant to the provisions of SB 743 and the City’s ZI File 2452, aesthetic and parking impacts are not considered significant impacts on the environment in this evaluation, and therefore a detailed aesthetics analysis is not appropriate for this CEQA document. Therefore, there would be no impacts.

Mitigation Measures: No mitigation measures are required.

- c. No Impact.** Except as provided in Public Resources Code Section 21099, would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the

⁵ City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Accessed on July 12, 2022 at: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>

⁶ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Accessed on July 11, 2022 at: <http://zimas.lacity.org/>.

site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Project Site is located within a TPA, as it is located within 0.5 miles of the Wilshire/Western Metro Station and Wilshire/Normandie Metro Station, existing major transit stops. The City's Zone Information and Map Access System (ZIMAS) also indicates that the Project Site is located within a TPA. The Project proposes to redevelop the infill Project Site within a highly urbanized area of the City by replacing existing commercial use structures with an eight-story mixed-use building with commercial, office and residential features. The Project Site is surrounded by existing urban uses, including commercial, residential, and mixed-use developments. As the Project proposes to develop a mixed-use project on the infill Project Site within a TPA, pursuant to the provisions of SB 743 and the City's ZI File 2452, aesthetic and parking impacts are not considered significant impacts on the environment in this evaluation, and therefore a detailed aesthetics analysis is not appropriate for this CEQA document. Therefore, there would be no impacts.

Mitigation Measures: No mitigation measures are required.

d. No Impact. Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

The Project Site is located within a TPA, as it is located within 0.5 miles of the Wilshire/Western Metro Station and Wilshire/Normandie Metro Station, existing major transit stops. The City's Zone Information and Map Access System (ZIMAS) also indicates that the Project Site is located within a TPA. The Project proposes to redevelop the infill Project Site within a highly urbanized area of the City by replacing existing commercial use structures with an eight-story mixed-use building with commercial, office and residential features. The Project Site is surrounded by existing urban uses, including commercial, residential, and mixed-use developments. As the Project proposes to develop a mixed-use project on the infill Project Site within a TPA, pursuant to the provisions of SB 743 and the City's ZI File 2452, aesthetic and parking impacts are not considered significant impacts on the environment in this evaluation, and therefore a detailed aesthetics analysis is not appropriate for this CEQA document. Therefore, there would be no impacts.

Mitigation Measures: No mitigation measures are required.

II. AGRICULTURE AND FORESTRY RESOURCES.

Would the project:

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------------|--|------------------------------------|-------------------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <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"/> |

Impact Analysis

a. No Impact. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The Project Site is located in a highly urbanized area of the City within the Wilshire Community Plan area, which has been developed for several decades. According to the California Department of Conservation California Important Farmland Finder⁷ the Project Site is classified as “urban and built-up land,” and there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the vicinity of the Project Site. There would be no impacts.

b. No Impact. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The Project Site contains no farmland and does not have and would not be eligible for a Williamson Act Contract. There would be no impacts.

⁷ California Department of Conservation, Division of Land Resource Protection, California Important Farmland Finder, Accessed on July 8, 2022 at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.

c. No Impact. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The Project Site is located in a highly urbanized area of the City which has been developed for several decades. The area is zoned for urban uses as there are no forests on or near the Project Site. There would be no impacts.

d. No Impact. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The Project Site is located in a highly urbanized area of the City which has been developed for several decades. There is no forest land on or near the Project Site. There would be no impacts.

e. No Impact. Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The Project Site is located in a highly urbanized area of the City which has been developed for several decades. Existing structures and a paved parking lot are being replaced by a multistory mixed-use building. The Project Site is not near farmland or forest, and none of the development activities could result in conversion of farmland or forest. There would be no impacts.

Mitigation Measures: No mitigation measures are required.

III. AIR QUALITY.

Would the project:

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|--------------------------|
| 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"/> |

Impact Analysis

The proposed Project would be located in an urban area in the City's Wilshire Community Plan Area, which is situated within the South Coast Air Basin ("Air Basin"). The Air Basin is bounded by the Pacific Ocean to the west, the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and San Diego County to the south. The South Coast Air Quality Management District (SCAQMD) is the agency responsible for regulating stationary sources of emissions in the Air Basin.

In addition to being a highly developed metropolitan region with a large population, the Air Basin's prevailing climate often includes light winds, shallow vertical mixing, and extensive sunlight, as well as the adjacent mountain ranges which hinder dispersion of air pollutants, can result in degraded air quality within the Air Basin.

The Project's estimated construction emissions were modeled using the California Emissions estimator Model (CalEEMod.2020.4.0), a statewide land use emissions computer model developed for the California Air Pollution Officers Association (CAPCOA) in collaboration with the California Air Districts to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with a variety of land use projects. The output reports from CalEEMod are included as an appendix to the Air Quality and Greenhouse Gas Impact Analysis, prepared by Envicom Corporation, dated August 2022, and included as **Appendix A**.

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

In the Air Basin, the agencies designated to develop the regional air quality plan are the SCAQMD and the Southern California Association of Governments (SCAG). The SCAQMD 2016 Air Quality Management Plan (AQMP) is a regional blueprint for achieving federal air quality standards and healthful air, and includes integrated strategies and measures needed to meet the National Ambient Air Quality Standards (NAAQS) within the Air Basin, within which the Project Site is located. The AQMP focuses on achieving clean air standards while accommodating population growth as forecast by the SCAG. The Project's mixed-use structure providing a total of 251 residential apartment units, including 18 live/work units, with 18,000

square feet of creative office space, and a total of 22,500 square feet of commercial office space would not generate a substantial increase in regional population or employment growth, and it does not meet the criteria for statewide, regional, or areawide significance as defined in the CEQA Statute and Guidelines Section 15206.

The 2016 AQMP includes the following objectives:

- 1) Eliminate reliance on future technologies measures (to show future attainment of air quality standards) to the maximum extent feasible.
- 2) Calculate and take credit for co-benefits from other planning efforts.
- 3) Develop a strategy with fair-share emission reductions at the federal, state, and local levels.
- 4) Invest in strategies and technologies meeting multiple objectives regarding air quality, climate change, air toxics exposure, energy, and transportation.
- 5) Identify and secure significant funding for incentives to implement early deployment and commercialization of zero and near-zero technologies.
- 6) Enhance the socioeconomic analysis and pursue the most efficient and cost-effective path to achieve multi-pollutant and multi-deadline targets.
- 7) Prioritize enforceable regulatory measures as well as non-regulatory, innovative and “win-win” approaches for emission reductions.

These objectives are not project-specific guidelines, and the Project would not interfere with the SCAQMD efforts to achieve these stated objectives. The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement.⁸

The 2016 overall control strategy is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies and reductions from federal sources, which include aircraft, locomotives, and ocean-going vessels. These strategies are to be implemented in partnership with the CARB and United States Environmental Protection Agency (U.S. EPA). In addition, the RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the AQMP. The Project Site is located within a TPA, where existing transit options reduce the need for reliance on personal vehicle transportation, and thus reduce associated automobile emissions consistent with general purposes of the AQMP in terms of land use planning for mixed-use transit-oriented development.

SCAQMD has continued to adopt and implement regulatory measures in order to reduce air pollution emissions from a wide range of sources and to reduce public exposure to unhealthful air pollution. The 2016 AQMP proposes robust reductions for oxides of nitrogen (NO_x) from new regulations on Regional Clean Air Incentives Market (RECLAIM) facilities (e.g., refineries, power plants, etc.), non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest NO_x emissions levels achievable but there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives. The 2016 AQMP strategies also include development of incentive funding to advance deployment of new cleaner technologies at a pace that is not feasible through regulation alone. The Project would be required to comply with all regulations regarding appliances and equipment that would be applicable to the proposed uses, including regulations that relate to energy conservation and/or emissions reduction of criteria pollutants.

⁸ South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, March 2017.

The Project does not meet the criteria for statewide, regional, or areawide significance as defined in the CEQA Statute and Guidelines Section 15206. Additionally, the Project Site is located within a TPA, where existing transit options reduce the need for reliance on personal vehicle transportation, and thus reduce associated automobile emissions consistent with general purposes of the AQMP in terms of land use planning for transit-oriented development.

In addition, as discussed in the evaluation below, the Project's construction or operations activities would not result in emissions of criteria pollutants that exceed the SCAQMD's thresholds of significance. Therefore, the Project would not substantially affect conformance with the AQMP, nor would it obstruct its implementation; therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. Would the project Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

SCAQMD provides significance thresholds for emissions of criteria pollutants including: reactive organic gases (ROG)⁹, NO_x, carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter (PM-10 and PM-2.5)¹⁰. Projects in the SCAQMD with daily emissions that exceed any of the following emission thresholds shown in **Table V-1, SCAQMD Daily Maximum Emissions Thresholds**, may be considered significant under CEQA guidelines.

Table V-1
SCAQMD Daily Maximum Emissions Thresholds

| Pollutant | Construction (lbs./day) | Operations (lbs./day) |
|-----------------|-------------------------|-----------------------|
| ROG | 75 | 55 |
| NO _x | 100 | 55 |
| CO | 550 | 550 |
| SO _x | 150 | 150 |
| PM-10 | 150 | 150 |
| PM-2.5 | 55 | 55 |

Source: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, Revision April 2019.

The SCAQMD guidance for evaluation of cumulative impacts under CEQA states that “As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR” (the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions is an exception).¹¹ Further, the SCAQMD guidance states that “Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.” SCAQMD recommends that public agencies perform cumulative impact analyses for air quality in the same manner as SCAQMD. As such, a project that does not exceed the emissions thresholds shown in Table III-1 would not have a cumulatively considerable net increase of any criteria pollutant.

⁹ For purposes of this analysis, volatile organic compounds (VOC) and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC.

¹⁰ PM-10 and PM 2.5 refer to particulate matter of less than 10 microns and less than 2.5 microns, respectively.

¹¹ SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution Appendix D, August 2003.

Construction Emissions

The proposed project would redevelop an approximately 1.45-acre infill site by constructing an 8-story mixed-use structure providing a total of 251 residential apartment units, including 18 live/work units, with 18,000 square feet of commercial space, and a total of 22,500 square feet of commercial office space. The proposed project would incorporate two subterranean parking levels, and together with ground level parking spaces would provide a total of 284 spaces for vehicle parking onsite. A total of 165 long-term bicycle parking spaces and 39 short-term bicycle parking spaces would be provided on the ground floor of the project. The project site is located within a Transit Oriented Community (TOC) Tier 3 pursuant to Los Angeles Municipal Code (LAMC) 12.22 A.31 Affordable Housing Incentive Program. Public transit facilities in the project site vicinity include two subway stations within approximately 0.4 miles walking distance, and several bus stops serviced by a variety of local and regional carriers. The nearest bus stop is located within approximately 65 feet of the project site.

Construction of the project would require demolition of approximately 22,000 square feet of existing buildings, as well as removal of surface parking lots. Approximately 1,073 tons of debris would be removed for site preparation. Grading and excavation for the subterranean parking levels would require export of approximately 58,300 cubic yards of soil, which would be hauled to Azusa Land Reclamation, located at 1211 West Gladstone in Azusa, CA, approximately 27 miles east of the project site.

During construction, emissions of air pollutants would be generated primarily from the use of heavy equipment on-site for construction of the new land uses, including exhaust from internal combustion engines and dust from earth moving activities. A conceptual construction equipment fleet list and approximate duration of each construction phase is shown in **Table V-2, Conceptual Construction Equipment Fleet**.

Table V-2
Conceptual Construction Equipment Fleet

| Phase Name and Duration | Equipment |
|---------------------------------|---------------------------|
| Demolition (20 days) | 1 Concrete/Industrial Saw |
| | 1 Rubber-tired Dozer |
| | 1 Excavator |
| | 3 Loader/Backhoes |
| Site Preparation (7 days) | 1 Grader |
| | 1 Loader/Backhoe |
| | 1 Rubber-tired Dozer |
| Grading (36 days) | 1 Grader |
| | 1 Excavator |
| | 1 Rubber tired dozer |
| | 2 Loader/Backhoe |
| Construction (400 days) | 1 Crane |
| | 1 Generator Set |
| | 1 Forklift |
| | 3 Welders |
| | 1 Loader/Backhoe |
| Paving (10 days) | 1 Cement/mortar Mixer |
| | 1 Paver |
| | 1 Roller |
| | 1 Loader/Backhoe |
| Architectural Coating (30 days) | 1 Air Compressor |
| Source: Corbel Architects | |

Dust emissions generated during construction are called “fugitive emissions,” because such emissions are not amenable to collection and discharge through a controlled source. SCAQMD Rule 403 provides regulatory dust control measures that would apply to the Project during construction, because of the non-attainment status of the Air Basin for PM-10. The following dust control measures would be implemented during construction as needed to comply with Rule 403 regulations:

- 1) Apply soil stabilizers or moisten inactive areas.
- 2) Prepare a high wind dust control plan.
- 3) Stabilize previously disturbed areas if subsequent construction is delayed.
- 4) Water exposed surfaces as needed to avoid visible dust leaving the construction area (typically three times/day).
- 5) Minimize in-out traffic from construction zone.
- 6) Sweep streets daily if visible soil material is carried out from the construction area.

The Project’s maximum daily construction emissions as calculated by CalEEMod Version 2020.4.0 are shown in **Table V-3, Construction Activity Maximum Daily Emissions**.

Table V-3
Construction Activity Maximum Daily Emissions

| Construction | Criteria Pollutants | | | | | |
|--|---------------------|-----------------|------|-----------------|------------------|-------------------|
| | ROG | NO _x | CO | SO ₂ | PM ₁₀ | PM _{2.5} |
| Maximum Daily Emissions (lbs/day) ^(a) | 63.4 | 48.8 | 22.6 | 0.2 | 11.7 | 5.4 |
| SCAQMD Thresholds | 75 | 100 | 550 | 150 | 150 | 55 |
| Exceeds Threshold? | No | No | No | No | No | No |
| Source: Envicom Corporation, Air Quality and Greenhouse Gas Impact Analysis, August 2022. (a) Construction emissions reflect required compliance with SCAQMD Rule 403 for applying water during grading to reduce dust. | | | | | | |

As shown in Table III-3, peak daily construction activity emissions of criteria air pollutants would not exceed the SCAQMD thresholds of significance. Therefore, Project’s potential to result in a cumulatively considerable net increase of regional criteria pollutants during construction would be less than significant.

Although the Project’s fugitive dust emissions would be below SCAQMD thresholds during construction, the Project would be required to implement appropriate dust control measures during construction in compliance with SCAQMD Rule 403 - Fugitive Dust as described in **Regulatory Compliance Measure RCM-AQ-1**.

Regulatory Compliance Measure RCM-AQ-1: Construction Period Air Quality (Demolition, Grading, and Construction Activities)

- 1) All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD Rule 403.
- 2) The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- 3) All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 miles per hour), to prevent excessive amounts of dust.

- 4) All dirt/soil loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.
- 5) All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- 6) General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- 7) Trucks having no current hauling activity shall not idle but be turned off.

Operational Emissions

The Project would generate emissions of criteria pollutants during the operations period associated with area sources (consumer products, area architectural coatings, and landscaping equipment), energy use (building electricity and natural gas usage), and mobile sources (vehicle trips). The Project's maximum daily emissions of criteria pollutants during operations are shown in **Table V-4, Maximum Daily Operations Emissions (pounds/day)**. In addition, CalEEMod.2020.4.0 was used to estimate the operational emissions of the existing uses on the Site that would be removed. Table III-4 shows these existing use emissions and summarizes the net change in operational emissions by subtracting the existing use emissions from the proposed use emissions.

Table V-4
Maximum Daily Operations Emissions (pounds/day)

| Emissions Sources | ROG | NO_x | CO | SO₂ | PM₁₀ | PM_{2.5} |
|--|--------------|-----------------------|--------------|-----------------------|------------------------|-------------------------|
| Proposed Uses | | | | | | |
| Area | 6.57 | 0.24 | 20.72 | <0.01 | 0.11 | 0.11 |
| Energy | 0.07 | 0.64 | 0.30 | <0.01 | 0.05 | 0.05 |
| Mobile | 4.44 | 4.67 | 43.77 | 0.10 | 10.61 | 2.90 |
| Total | 11.08 | 5.55 | 64.80 | 0.10 | 10.78 | 3.04 |
| Existing Uses | | | | | | |
| Area | 0.53 | <0.01 | 0.08 | 0.00 | <0.01 | <0.01 |
| Energy | <0.01 | 0.02 | 0.01 | <0.01 | <0.01 | <0.01 |
| Mobile | 0.98 | 1.07 | 8.83 | 0.02 | 1.76 | 0.48 |
| Total | 1.52 | 1.09 | 8.92 | 0.02 | 1.77 | 0.48 |
| Net Increase | 9.56 | 4.46 | 55.88 | 0.08 | 9.01 | 2.56 |
| SCAQMD Thresholds | 55 | 55 | 550 | 150 | 150 | 55 |
| Significant Impact? Y/N | No | No | No | No | No | No |
| Source: Envicom Corporation, Air Quality and Greenhouse Gas Impact Analysis, August 2022. Totals may not add due to rounding. | | | | | | |

As shown in Table III-4, the Project's operational emissions from the proposed Project would be far below the SCAQMD maximum daily emission thresholds for criteria pollutants without consideration of the elimination of existing use emissions.

The Project's removal of the existing uses from the Site would result in a net change in emissions that would be even further below the SCAQMD maximum daily emission thresholds as shown in Table III-4. Therefore, the Project's potential to result in a cumulatively considerable net increase of any criteria pollutant during operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. Would the project expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors are populations that are generally more susceptible to the effects of air pollution than the population at large. Land uses considered to be sensitive receptors include residences, long-term care facilities, schools, playgrounds, parks, hospitals, and outdoor athletic facilities. The closest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Project would be existing multi-family residences that are located on adjacent properties to the north of the Project Site.

Local Significance Thresholds Impacts

The SCAQMD developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs are only applicable to the following criteria pollutants: NO_x, CO, PM-10, and PM-2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and they are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. According to SCAQMD guidance, the use of LSTs is voluntary, to be implemented at the discretion of local public agencies acting as a lead agency pursuant to the CEQA.¹²

Pursuant to SCAQMD LST Methodology for projects with boundaries located closer than 25 meters to the nearest receptor, LST screening levels for a 25-meter source-receptor distance were utilized for the Project.¹³ LST pollutant screening level concentration data is currently published for one, two and five-acre sites. For the Project, thresholds for a one-acre site were used. This evaluation is based on the estimated on-site daily construction emissions for the phase and year representing the highest daily emissions. Daily averages would be lower than the reported maximum amounts.

Table V-5, LST - Maximum On-site Construction Emissions, shows the relevant thresholds and the estimated peak daily on-site emissions during the construction phases that would generate the highest level of on-site emissions for each pollutant evaluated for LST impacts. The emissions shown in Table III-5 include the application of water to exposed soils twice daily for dust suppression as required for compliance with SCAQMD Rule 403, Fugitive Dust, and included as RC-AQ-1.

Table V-5
LST - Maximum On-site Construction Emissions

| LST 1 acre/25 meters Central LA | LST Pollutants | | | |
|--|-----------------|------|------------------|-------------------|
| | NO _x | CO | PM ₁₀ | PM _{2.5} |
| Maximum Daily On-Site Emissions ^(a) (pounds/day) | 16.0 | 16.7 | 3.5 | 2.1 |
| Applicable LST Screening Level (pounds/day) | 74 | 680 | 5 | 3 |
| Exceeds Threshold? | No | No | No | No |
| Source: Envicom Corporation, Air Quality and Greenhouse Gas Impact Analysis, March 2022. | | | | |
| ^(a) Construction emissions reflect required compliance with SCAQMD Rule 403 and RC-AQ-1 for applying water during grading to reduce dust. | | | | |

¹² SCAQMD, Localized Significance Thresholds, Accessed at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, July 14, 2020.

¹³ South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, Revised July 2008. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2> on July 14, 2022.

As seen in Table III-5, the peak on-site emissions during construction would not exceed the applicable SCAQMD LSTs, and as such, the Project's potential to generate emissions that would expose sensitive receptors to substantial pollutant concentrations would be less than significant.

Toxic Air Contaminants

Exhaust particulates emitted from diesel powered equipment contains carcinogenic compounds, or toxic air contaminants (TACs). As residential projects do not generate a substantial quantity of diesel truck trips during operations, any measurable diesel TAC emissions from the project would occur for only a brief period during construction activities that would require onsite use of heavy-duty equipment. The toxicity of diesel exhaust is evaluated relative to a 24 hour per day, 365 days per year, 70 year lifetime exposure. The SCAQMD does not generally require the analysis of construction-related diesel emissions relative to health risk due to the short period for which the majority of diesel exhaust would occur. Health risk analyses are typically assessed over a 9-, 30-, or 70-year timeframe rather than a relatively brief construction period, due to the lack of health risk associated with such a brief exposure. As such, potential impacts of the project due to emissions of TACs would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Substantial odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling materials used in manufacturing processes, as well as some sewage treatment facilities and landfills. As the Project involves no such land uses or types of activities, no odors from these types of uses or activities would occur.

During the construction phase, activities associated with the application of architectural coatings and other interior and exterior finishes, paving, or other construction activities may produce discernible odors typical of most construction sites. Such odors would be temporary based on the limited duration of each construction phase.

The Project has been designed with enclosed trash and recyclable receptacle areas for solid wastes generated by the Project during operations. The solid waste bins would be located within enclosed rooms on the ground floor of the proposed structures with vertical chutes extending to the residential floors above. The solid waste storage enclosures would have doors to allow access for regular servicing/emptying for disposal by a solid waste hauler from the proposed internal driveway or Harvard Boulevard. As such, potential odors associated with solid waste generated during the Project operations would be shielded from the nearest offsite sensitive uses.

Therefore, the Project's potential to emit objectionable odors affecting a substantial number of people during construction or operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

IV. BIOLOGICAL RESOURCES.

Would the Project:

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|-------------------------------------|
| a. Have a substantial 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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"/> |

Impact Analysis

This assessment evaluates biological resources within areas potentially subject to ground or vegetation disturbance by the Proposed Project, including the Project Site and adjacent areas in the public right-of-way. The Project Site is located within a highly urbanized area of the City where there is very little to no naturally occurring vegetation. Several buildings and paved parking areas currently occupy the subject property. The Project Site is surrounded by residential, commercial, and mixed-use buildings, primarily multi-story.

There are no sensitive biological communities on the Project Site or within the vicinity. Sensitive biological communities include habitats that fulfill special functions or have special values, such as wetlands, streams, or riparian habitat. These habitats are protected under federal regulations such as the Clean Water Act; state regulations such as the Porter-Cologne Act, the California Department of Fish and Wildlife (CDFW)

Streambed Alteration Program, and CEQA; or local ordinances or policies such as the City or County of Los Angeles (County) tree ordinances, Special Habitat Management Areas, and General Plan Elements.

The following sections discuss potentially adverse impacts on biological resources within the Project Site, to what extent those impacts may occur, and how potential impacts may be mitigated to reduce impacts to less than significance. Information on trees on and adjacent to the Project Site are provided in the two Arborist Reports provided in **Appendix B**.

a. Less Than Significant Impact. Would the project have a substantial 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?

The Project Site is located within a densely urbanized area of the City and does not contain any natural landscapes or naturally occurring native vegetation. Vegetation comprises primarily non-native landscaped tree and shrub species and non-native herbaceous species typical of highly urbanized developed areas. None of the vegetation on site provides suitable habitat for federal, state, or local protected special-status plant or wildlife species. However, bird species common to urban areas would potentially nest in the trees present on site during nesting bird season.

According to the Project's Arborist Reports, there are no protected trees within the Project Site or adjacent to it as defined by Section 46.01 of the Los Angeles Municipal Code (LAMC), and none of the trees present are native species. Within the public right-of-way adjacent to the Project Site there are a total of 24 trees, 12 of which are at least 8" in diameter which are identified as "significant" trees¹⁴. Significant trees are not protected and have no special status, they are identified as such for the purposes of the Department of City Planning. Three significant street trees will be removed in order to construct the curb apron on Hobart Boulevard, and 11 other smaller street trees adjacent to Harvard Boulevard will be removed. There are 25 trees located within the Project parcel boundaries, 15 of which are significant trees¹⁵. All trees within the Project boundaries will be removed. Existing trees and the number to be removed are detailed in **Table V-6, Project Tree Inventory**.

Common wildlife, particularly birds, may be exposed to noise and other disturbance during construction, but these activities are typical of urban environments. Species likely to occur within the site under the existing conditions would be those that are typically acclimated to these types of disturbances in highly urbanized environments; thus, most introduced disturbances, aside from removal of vegetation or ground disturbance, would likely not negatively affect common wildlife species.

However, removal of trees during the nesting bird season (February 1 to August 31) could have the potential to result in impacts to active bird nests. Migratory non-game native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50 of the Code of Federal Regulations, or C.F.R., Section 10.13, List of Migratory Birds). Consistent with the MBTA, Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the Federal MBTA).

¹⁴ Class One Arboriculture Inc., 3433 W. 8th St. Arborist Report. August 9, 2021.

¹⁵ Landscape Architecture Urban Design, 3433 West 8th Street, Los Angeles, CA. June 1, 2021

Table V-6
Project Tree Inventory

| Street Trees | Count | To Be Removed |
|--|-------|---------------|
| <i>Ficus macrocarpa</i> | 11* | 3* |
| <i>Butia capitata</i> | 1 | - |
| <i>Cupressus sempervirens</i> | 11 | 11 |
| <i>Callistemon viminalis</i> | 1 | - |
| On Site Trees | Count | To Be Removed |
| <i>Ficus macrocarpa</i> | 4* | 4* |
| <i>Brachychiton sp.</i> | 1 | 1 |
| <i>Cupaniopsis anacardioides</i> | 1* | 1* |
| <i>Punica granatum</i> | 2 | 2 |
| <i>Eriobotrya deflexa</i> | 1* | 1* |
| <i>Washingtonia robusta</i> | 7* | 7* |
| <i>Eriobotrya japonica</i> | 6 | 6 |
| <i>Citrus sp.</i> | 1 | 1 |
| <i>Fraxinus uhdei</i> | 2* | 2* |
| * Indicates over 8" in diameter. Source: Class One Arboriculture Inc., 3433 W. 8 th St. Arborist Report, August 9, 2021 and YKD Landscape Architecture Urban Design, 3433 West 8 th Street, June 1, 2021 | | |

A nesting bird survey of the onsite trees and shrubs conducted prior to their removal, if such activities would occur during the nesting season, and observance of relevant buffer distances around active nests if present, would ensure compliance with the MBTA and the related California Fish and Game Code Sections.

Compliance with City **Regulatory Compliance Measure RCM-BIO-1** would provide protections for potential nesting birds.

Regulatory Compliance Measure RCM-BIO-1: Nesting Birds

- 1) Proposed project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the nesting bird season, which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).
- 2) If project activities cannot feasibly avoid the nesting bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
 - a) Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting nesting bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work.
 - b) If a nesting bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
 - c) Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Qualified Biological Monitor, shall be

postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

- d) The Qualified Biologist shall record the results of the recommended protective measures described above to document compliance with applicable state and federal laws pertaining to the protection of nesting birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

Because there are no sensitive, or special status species on or near the Project Site, and compliance with the above RCM will ensure nesting birds are protected, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. No Impact. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The Project Site and surrounding properties are located within a highly urbanized area, and the Project Site does not include any natural communities such as riparian habitat, coastal sage scrub, oak woodlands, or wetlands. Additionally, there are no natural or manmade watercourses on or near the Site, nor is the Project Site located within or near a Significant Ecological Area (SEA) designated by the County.¹⁶ Therefore, the Project would have no impact on riparian habitat or sensitive natural communities.

Mitigation Measures: No mitigation measures are required.

c. No Impact. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?

There are no natural or manmade wetlands or watercourses on or near the Site, which is confirmed by the USFWS National Wetlands Mapper.¹⁷ Therefore, the Project would not remove or otherwise impair federally protected wetlands or waters of the U.S. and would therefore result in no impact.

Mitigation Measures: No mitigation measures are required.

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

A wildlife corridor contains physical connections that allow wildlife to move between areas of suitable habitat in both undisturbed landscapes and landscapes fragmented by urban development. The Project Site is not within an area identified as important to wildlife movement, such as a regional-scale habitat linkage or a wildlife movement corridor.¹⁸ With the exception of trees and shrubs on site which may provide suitable

¹⁶ County of Los Angeles, Department of Regional Planning, General Plan 2035, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map, Adopted October 6, 2015.

¹⁷ USFWS, National Wetlands Inventory, Surface Water and Wetlands, Accessed on July 7, 2022 at: <https://www.fws.gov/wetlands/data/mapper.HTML>.

¹⁸ County of Los Angeles, Department of Regional Planning, General Plan 2035, Figure 9.2, Regional Habitat Linkages, Adopted October 6, 2015.

nesting habitat for birds, there is no habitat suitable for wildlife nursery sites. RC-BIO-1 accounts for any bird species that may be nesting at the site by requiring bird surveys to be conducted prior to disturbance. As the Project Site is not located within a wildlife corridor, the Project would not substantially interfere with migratory corridors or impede wildlife movement and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

As detailed in the arborist reports, no protected native trees subject to the City's Protected Tree Ordinance (Ordinance No. 177404)¹⁹ are located within the subject property or adjacent areas. However, there are significant trees, defined as trees over 8" in diameter at breast height, located within the Parcel boundaries and the adjacent right-of-way which will be affected by the Project. The City requires that on-site significant trees are replaced at a 1:1 ratio, and any street trees removed from the right-of-way to be replaced according to the direction of the Urban Forestry Division. As detailed in Section IV(a) above, within the Project boundaries 15 significant trees will be removed and per the Project landscape plans will be replaced with:

- 1) 1 *Parkinsonia 'Desert Museum'*
- 2) 1 *Cercis occidentalis*
- 3) 17 *Laurus nobilis*
- 4) 17 *Washingtonia filifera*
- 5) 8 *Acer palmatum*

In addition, three ficus and 11 cypress street trees will be removed from the right-of-way. The number, species, and placement of their replacements will be determined the Urban Forestry Division prior to permitting and the Project landscape plan is considered conceptual in this regard. Compliance with the following RCMS will ensure Project consistency with local regulations.

Regulatory Compliance Measure RCM-BIO-2: Landscape Plan

Prior to issuance of a grading permit, the Project Applicant shall submit a landscape plan for approval by the Department of City Planning and Urban Forestry Division of the Bureau of Street Services, Department of Public Works. The landscape plan should comply with requirements outlined in the City of Los Angeles Landscape Ordinance No. 170,978.

Regulatory Compliance Measure RCM-BIO-3: Tree Removal (Public Right-of-Way)

Removal of trees in the public right-of-way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077). The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, at a ratio determined by the Urban Forestry Division, shall be required for the unavoidable loss of significant (eight-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground)

¹⁹ City of Los Angeles, Los Angeles Tree Ordinance (No. 177404), LAMC, Sec. 12.21.

trees in the public right-of-way. All replacement trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

Regulatory Compliance Measure RCM-BIO-4: Tree Removal (On Site)

All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 4.5 feet) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

As there are no protected trees or other biological resources on site replacement of removed trees according to the RCMs listed above will ensure the Project is consistent with local regulations adopted for the protection of biological resources and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

f. No Impact. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The Project Site is not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Thus, the Project would result in no impact related to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans.

Mitigation Measures: No mitigation measures are required.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| V. CULTURAL RESOURCES. | | | | |
| Would the project: | | | | |
| a. Cause a substantial adverse change in significance of a historical resource pursuant in CEQA Section 15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Section 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"/> |

Impact Analysis

The following section incorporates information for the project site provided by the Phase I Cultural Resource Assessment (“Cultural Assessment”), dated July 17, 2019, prepared by Envicom Corporation, which is included as **Appendix C**, and the Historic Resource Evaluation (“Historic Evaluation”), prepared by Kaplan Chen Kaplan, dated October 30, 2019, and included as **Appendix D**.

The Cultural Assessment included a cultural resource record search conducted by the South Central Coastal Information Center (SCCIC), a request for the Native American Heritage Commission (NAHC) to conduct a record search for Native American cultural resources, and a request for the Natural History Museum of Los Angeles County (NHM) to conduct a record search for paleontological resources, as well as a pedestrian survey of the Site. These record searches examined the Project Site plus a 0.25-mile area (“study area”) around the Project Site, to assess the overall cultural resource sensitivity of the Project region. Additional databases that were examined during the Phase I Cultural Resource Assessment included historic regional maps, historic United States Geological Survey maps, and historic Google Earth images. The University of California Santa Barbara Library Historic Aerial Photograph Database was also examined for images that included the Project Site.

The record search findings obtained at the SCCIC were negative for cultural resources within the Project property. Ten historic cultural resources were identified within the 0.25-mile radius surrounding study area, the nearest resource being the Ashby Apartments, Los Angeles Historic-Cultural Monument No. 960 located on the south side of West 8th Street across the road and separated by a parking lot from the Project Site; all other resources are a block or more away from the subject property. The Phase I Cultural Resource Assessment determined that the information provided by the SCCIC did not indicate any cultural resource issues of relevance to the Project. The NAHC record search resulted in negative findings.

The Historic Evaluation investigated the existing structures on site and concluded none are considered eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as City of Los Angeles Historic-Cultural Monuments as individual resources. It also concluded that there is no eligible historic district which would include the buildings on the subject site.

a. Potentially Significant Unless Mitigation Incorporated. Would the project cause a substantial adverse change in significance of a historical resource pursuant in CEQA Section 15064.5?

The Site is currently developed with five commercial buildings clustered near the southeast corner of the property, facing 8th Street and Harvard Boulevard, and one single-family house in the northeastern corner of the property facing Harvard Boulevard. Each structure is over 50 years old and therefore requires evaluation of potential historic status. The location, description, and year of construction for the buildings is detailed in **Table V-7, Building Inventory**.

Table V-7
Building Inventory

| Bldg No. | Address | Building Type | Location Description | Year Built | Original Style |
|--|---------------------------------|-------------------------|---|------------|----------------------|
| A | 3431-3445 W. 8 th St | Commercial, 1 & 2 story | SE corner of property | 1938 | Colonial Revival |
| B | 3447-3453 W. 8 th St | Commercial, 1 story | West adjacent to Bldg No. 1 | 1940 | Neoclassical Revival |
| C | 3455 W. 8 th St | Commercial, 1 story | West adjacent to Bldg No. 2 | 1940 | None |
| D | 765 S. Harvard Blvd | Commercial, 2 story | North adjacent to Bldg No. 1 facing Harvard | 1951 | Neoclassical Revival |
| E | 767 S. Harvard Blvd | Commercial, 2 story | North adjacent to Bldg No. 1 facing parking lot | 1951 | None |
| F | 749 S. Harvard Blvd | Single family, 1 story | NE corner of property | 1912 | Craftsman |
| Source: Kaplan Chen Kaplan, 3411-3445 W. 8th Street, 3447-3453 W. 8th Street, 3455 W. 8th Street, 765 S. Harvard Boulevard, 767 S. Harvard Boulevard, 749 S. Harvard Boulevard Los Angeles, California, Historic Resource Evaluation, October 30, 2019 | | | | | |

A structure would be considered a “historical resource” per CEQA Section 15064.5 if it was listed in, or determined to be eligible for listing in, the National Register of Historic Places or the California Register of Historical Resources, or if it were included in a local register of historic resources or determined to be eligible for listing in a local register.

None of the existing structures are currently listed in the National Register or the California Register, and none are designated as Historic-Cultural Monuments (HCM) by the City, or located within an existing local historic district. None of the structures have been determined by a previous survey to be eligible for listing or designation, either.

The structures have been surveyed previously for potential eligibility. In 2009 a historic resources survey of the Wilshire Center and Koreatown Redevelopment Project Area was conducted by the Community Redevelopment Agency (CRA). This survey concluded buildings B, C, and F were not eligible for historic designation. Buildings A, D, and E were not assessed individually in this survey. The CRA survey identified potential historic districts within the redevelopment area, but did not identify any potential district that included the subject buildings. In 2015 SurveyLA, the citywide historic resources survey, surveyed properties in the area that were left out of the CRA survey and did not flag buildings A, D, and E as potentially eligible.²⁰

As none of the structures are currently listed, or determined by survey to be eligible for listing, the Historic Evaluation assesses the potential eligibility of each structure. Eligibility is evaluated according to eligibility criteria, guided by publications from the National Register and historic context statements from the City. Eligibility criteria come from the National Register, California Register, and the HCM criteria found in the City’s Cultural Heritage Ordinance. The National and California Register criteria are very similar as the

²⁰ City of Los Angeles, Office of Historic Resources Department of City Planning, HistoricPlacesLA (SurveyLA), accessed at <http://historicplacesla.org/map>. Project area was surveyed in 2015.

California Register criteria are an adopted form of the National Register Criteria. The HCM criteria are very close in content to both and effectively have a lower threshold for being met, therefore, the HCM criteria are presented and made reference to in the proceeding discussions:

A City of Los Angeles Historic-Cultural Monument is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles. A proposed Monument may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria:

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

The National Register publishes various guidance on how to assess eligibility, such as National Register Bulletin 15: How to Apply National Register Criteria for Evaluation, and Bulletin 32, Guidelines for Evaluating and Documenting Properties Associated with Significant Persons. These guidebooks provide a rational framework for the objective evaluation of historic importance in the built environment and are used professionally for any historic inquiry as they can be applied at the National, State, or local level. Eligibility assessment is further guided by historic context statements developed for that purpose by the City's SurveyLA program. These statements identify important themes or trends in history and relate those themes to the built environment, providing historic background to properly contextualize the properties being evaluated. A property's integrity is another aspect of assessing eligibility. If a property meets one or more eligibility criteria its integrity- the property's ability to convey its significance- is assessed. A property that meets eligibility criteria should retain integrity in order to subsequently receive listing or be considered eligible for listing. Assessment of integrity is guided largely by the methods described in National Register Bulletin 15.

Findings

As shown in Table V-1 all of the existing commercial buildings were originally constructed between 1938 and 1951. The Historic Evaluation determines there is no evidence the properties are associated with any significant events that would qualify as "important events of national, state, or local history" per HCM criteria No. 1. SurveyLA historic contexts that are applicable to the second part of criteria No. 1, "exemplifies significant contributions to the broad cultural, economic or social history" are Neighborhood Commercial Development: Arterial Commercial Development 1880-1950, and Markets 1910-1975. Although building C was a Safeway for some time, there is no evidence it was significant in the development of supermarkets in the City, and it no longer retains integrity as the exterior was significantly remodeled twice. The Historic Evaluation determines that none of the commercial buildings exemplify significant contributions to the applicable historic contexts. The residential building, No. F in Table V-1, was constructed in 1912 and the Historic Evaluation determined there is no evidence the property is associated with any significant event, or that it is significant to or exemplary of its applicable context, which is Early Single-Family Residential Development, 1880-1930.

The Historic Evaluation reviewed the original builders and property owners of the buildings at the time of construction, and occupants over time. There was no evidence that any of the buildings would be eligible for listing for association with historic persons or "the lives of historic personages" as described in HCM criteria No. 2.

Regarding eligibility relating to the architecture or architect of the buildings, none were found eligible. Each of the commercial buildings exhibits elements of either Colonial Revival or Neoclassical Revival architecture, though buildings D and E were built outside of the period of significance for either style (1900-1940), and buildings C and E would properly not be considered representative of any style. The Historic Evaluation concludes that none of the commercial buildings are an excellent representative of their respective styles. Building A was designed by a master architect, Stiles O. Clements, whose work includes notable Los Angeles buildings the Pellissier Building and Wiltern Theatre, El Capitan theater, and the Mayan theater. However, the Historic Evaluation concludes it is not a notable or important work of the architect. Therefore, the Historic Evaluation concludes none of the commercial buildings embody “the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master” as stated in HCM criteria No. 3. Building F is a residential structure built in 1912 in the Craftsman style. The Historic Evaluation concludes, “the building does not exemplify the tenets of the Arts and Crafts movement and the Craftsman style of architecture,” and is not a rare or remarkable example of the style and would not be eligible for reasons related to its architecture either.

The overall conclusion of the Historic Evaluation is that none of the buildings on site would individually be eligible for listing on the National or California Register, or as a local HCM. The evaluation also considered if the buildings could be considered contributing structures to an historic district. As stated previously, the CRA survey evaluated the area for potential historic districts and did not find any that included the subject properties. The Historic Evaluation concurs and does not find an eligible district that includes the subject properties. Therefore, the existing structures on the Project Site are not historical resources as defined by CEQA and there will be no adverse impacts as a result of their demolition.

Buried Historic Resources

Although there are no historic resources present on the Site because the Project Site was developed prior to the 1940's the Phase I Cultural Resource Assessment determined that the area would be considered sensitive for unknown historic resources below the surface of the Site. As such, **Mitigation Measure CR-1** will be implemented so that initial excavations are monitored for potential buried historic resources. With implementation of the mitigation measure impacts would be less than significant.²¹

Mitigation Measures:

MM CR-1: Archaeological Monitoring

An archaeological monitor that meets the Secretary of Interior qualifications will be on site during removal of property pavement and grading of the top five feet of soil. The purpose of having an archaeologist on site is to assess if any significant cultural resources are buried below existing surface features. If such features or artifact concentrations are identified, then the project “discovery” protocol will be followed:

- a) The archaeological monitor will collect any historic material that is uncovered through demolition of the pavement or grading that is within a disturbed context, and can halt construction within 50-feet of a potentially significant cultural resource if necessary. Artifacts collected from a disturbed context or that do not warrant additional assessment can be collected without the need to halt grading. Discovery situations that do not lead to further assessment, survey, evaluation, or data

²¹ The Phase I recommendation to require monitoring of demolition to “assess whether elements of the earlier 1920s structures were incorporated into existing buildings” is not included in MM CR-1 as the Phase I was prepared prior to the Historic Evaluation which determined there would be no significant impact with demolition of the structures as they were not eligible for listing. If by chance “elements of the earlier 1920s structures were incorporated into existing buildings” such an occurrence would not have any bearing on the eligibility of the existing structures, and any such remnant feature would itself not be eligible for designation.

recovery can be described in the monitor's daily Monitoring Report. However, if foundations, privies, or other older historic features are encountered, the project "discovery" protocol should be followed.

- b) A final project Monitoring Report will be produced that discusses all monitoring activities and all artifacts recovered and features identified through monitoring of the demolition and grading of the project site. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the Monitoring Report. All artifacts recovered that are important, with diagnostic or location information that may be of importance to California and Los Angeles City history, will be cleaned, analyzed, and described within the Monitoring Report. All materials will be curated at an appropriate depository. If important materials are found during monitoring, a Curation Plan will be needed that is reviewed by the Lead Agency prior to the publication of the Monitoring Report
- c) If potentially significant intact deposits are encountered that are within an undisturbed context, then a cultural resource "discovery" protocol will be followed. If older historic (or prehistoric) features, artifact concentrations, or larger significant artifacts are encountered during demolition or grading within the first five feet, then all work in that area shall be halted or diverted away from the discovery to a distance of 50-feet until a qualified senior archaeologist can evaluate the nature and/or significance of the find(s). If the senior archaeologist (not the field monitor) confirms that the discovery is potentially significant, then the Lead Agency will be contacted and informed of the discovery.
- d) Construction will not resume in the locality of the discovery until consultation between the senior archaeologist, the owner's project manager, the Lead Agency, and all other concerned parties, takes place and reaches a conclusion approved by the Lead Agency. If a significant cultural resource is discovered during earth-moving, complete avoidance of the find is preferred. However, if the discovery cannot be avoided, further survey work, evaluation tasks, or data recovery of the significant resource may be required by the Lead Agency. The Lead Agency may also require changes to the Monitoring Plan, based on the discovery. All costs for the additional monitoring, discovery assessment, discovery evaluation, or data recovery of will be the responsibility of the applicant, within the cost parameters outlined under CEQA. All individual reports, including the final project Monitoring Report, will be submitted to the SCCIC at the conclusion of the project.

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

Based on the criteria in the 2006 L.A. CEQA Thresholds Guide, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources that presently exist within the Project Site. Section 15064.5 of the State CEQA Guidelines defines criteria for historical resources or resources that constitute unique archaeological resources.

The Project is located in a highly urbanized area of the City and has been subject to past disturbance by development, including the construction of commercial buildings that currently occupy the Site, as well as previous buildings that have been removed. Based on a review of the City's Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site and immediately surrounding areas within a 0.25 mile radius do not contain any known archaeological sites or archaeological survey areas.²²

The Phase I Cultural Resource Assessment of the Project Site included a search of SCCIC records to provide an inventory of all previously recorded archaeological and historic archaeological resources, as well as

²² City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.

previously conducted archaeological investigations or studies, within the Project Site plus a 0.25-mile radius. On July 1, 2019, the record search findings obtained at the SCCIC were negative for cultural resources within the Site. The assessment also requested NAHC review of the Sacred Lands File (SLF) to determine if any recorded Tribal Cultural Places or other sites of cultural importance were located within the Project Site or study area, which returned a negative result on July 8, 2019.

Due to the previous development of land uses on the Site, archaeological resources that may have existed near the Site surface are likely to have been disturbed or previously removed. However, the Project will result in deeper excavations than previously performed on the Site. As such, previously unknown archaeological resources may exist beneath the Project Site that could be uncovered during excavation activities. If previously unknown archaeological resources are found during excavation below the five feet that are covered by MM-CR-1, above, the Project would be required to follow procedures detailed in California Public Resources Code Section (PRC) 21083.2, which is accomplished through compliance with the City's **Regulatory Compliance Measure RCM-CR-1** which will ensure Project impacts to archaeological resources would be less than significant.

Regulatory Compliance Measure RCM-CR-1 (Archaeological)

If archaeological resources (sites, features, artifacts, or fossilized material) are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance and nature of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing or data recovery may be warranted. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

No known human burials have been identified on the Project Site or its vicinity. However, due to the proposed excavation activities of the Project, it is possible that unknown human remains could be uncovered at the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. If human remains are encountered unexpectedly during demolition, grading, and/or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. The Project would be required to comply with **Regulatory Compliance Measure RCM-CR-2 (Human Remains)**, which would ensure potential impacts related to the disturbance of unknown human remains would be less than significant.

Regulatory Compliance Measure RCM-CR-2: Human Remains

If human remains are encountered unexpectedly during construction, demolition, and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California

Public Resources Code Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- 1) Stop immediately and contact the County Coroner:
1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
- 2) If the human remains are determined to be prehistoric the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD).
- 3) The MLD shall complete the inspection of the site within 48 hours of notification and may recommend to the owner or representative for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- 4) If the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

Mitigation Measures: No mitigation measures are required.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| VI. ENERGY. | | | | |
| 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"/> |

Impact Analysis

The following analysis is based on the Air Quality and Greenhouse Gas Impact Analysis and emissions estimates calculated using CalEEMod, prepared by Envicom Corporation, dated March 2022, (Appendix A), and the calculations included in the Construction Fuel Consumption Worksheet, provided in **Appendix E**.

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

Construction

During construction, the Project would use heavy-duty equipment associated with demolition, site preparation, grading, paving, architectural coating, and building. Construction equipment used on the site would include excavators, graders, dozers, scrapers, air compressors, cranes, forklifts, generators, welders, rollers, pavers, and tractors equipped with front end loaders and backhoes. Construction also involves trucks for material and supplies delivery, as well as powered hand tools, including concrete saws. The majority of the equipment would likely be diesel-fueled. However, smaller equipment such as welders may be electric, gasoline, or natural gas-fueled, and tower cranes would likely be powered by electricity.

The CCR requires drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds not to idle the vehicle's primary diesel engine longer than five minutes at any location.²³ Compliance with this regulation would also result in efficient use of construction-related energy and prevent unnecessary consumption of energy from diesel fuel.

According to carbon dioxide (CO₂) emission factors for transportation fuels published by the U.S. Energy Information Administration, burning one gallon of diesel fuel generates approximately 22.4 pounds of CO₂ and burning one gallon of petroleum-based gasoline produces approximately 19.6 pounds of CO₂.²⁴ Based on these emissions factors and the Project's total construction-related CO₂ emissions, Project consumption of diesel and petroleum-based gasoline during construction was calculated and is shown in **Table V-8, Total Fuel Consumption During Project Construction**. The calculations are shown in a Construction Fuel Consumption Worksheet provided in Appendix E.

²³ California Code of Regulations, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.

²⁴ U.S. Energy Information Administration, Environment Carbon Dioxide Emissions Coefficients, February 2, 2016.

Table V-8
Total Fuel Consumption During Project Construction

| Energy Type | Total MT CO ₂ | Total CO ₂ pounds ^a | CO ₂ emission factors | Total Gallons Consumed |
|-----------------------|--------------------------|---|----------------------------------|------------------------|
| Total Diesel | 933.6 | 2,058,130 | 22.4 | 91,881 |
| Total Gasoline | 445.8 | 982,904 | 19.6 | 50,148 |

Source: CalEEMod, Construction Fuel Consumption Worksheet, Appendix D.
^a 1 MT = 2,204.62 lbs. (approx.)

As shown in Table VI-1, based on the U.S. Energy Information Administration fuel consumption factors, and the Project's estimated "total CO₂" emissions presented in the CalEEMod output sheets, it is estimated that the Project's construction activities would consume a total of approximately 91,881 gallons of diesel fuel and approximately 50,148 gallons of gasoline. In 2021, 13.8 billion gallons of gasoline were sold in California,²⁵ and in 2015 4.2 billion gallons of diesel, including off-road diesel, were sold in California.²⁶ As such, the use of construction equipment, transportation of materials, and workers necessary for Project construction would not represent a substantial proportion of annual gasoline or diesel fuel use in California.

Adherence to CCR Section 2485 and CARB anti-idling regulations for off-road diesel-fueled fleets would reduce the potential for wasteful use of energy by construction equipment. Due to the temporary duration of construction and the necessity of fuel consumption inherent in construction projects, fuel consumption would not be excessive or substantial with respect to fuel supplies. The energy demands associated with fuel consumption during construction would be typical of projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient, or unnecessary consumption of energy. Therefore, the Project's potential to result in environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction would be less than significant.

Operations – Electricity

The Project would generate additional demand for electricity from the Los Angeles Department of Water and Power (LADWP). As estimated by CalEEMod, the Project's total electricity demand would be approximately 2,202,488 kilowatt hours per year (kWh/year) or 2,202.5 megawatt hours per year (MWh/year). The existing land use's demand as estimated by CalEEMod is 295,349 kWh/year or 295.3 MWh/year, which would be removed, resulting in a net project demand of 1,907,139 kWh/year or 1,907.1 MWh/year. The LADWP supplies more than 24 million MWh/year of electricity to the City's residential and business customers.²⁷ The Project would replace an existing use within the LADWP service area and its net increase in demand would represent approximately 0.008 percent of the yearly electricity demand, which is negligible in relation to the entire City's electricity demand. Therefore, the Project would not result in substantial increase in electricity demand.

In addition, the Project would be required to comply with the applicable portions of the California Energy Code and California Green Building Standards Code (CALGreen Code), which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. The LADWP has increased renewable energy through active procurement of renewable

²⁵ California Energy Commission, California Gasoline Data, Facts, and Statistics, Accessed July 22, 2022 at: <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-gasoline-data-facts-and-statistics>.

²⁶ California Energy Commission, Diesel Fuel Data, Facts, and Statistics, Accessed July 22, 2022 at: <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics#:~:text=Diesel%20fuel%20is%20the%20second,including%20offroad%20diesel%20C%20was%20sold>.

²⁷ LADWP, Power Today, Accessed on July 22, 2022, at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-p-powertoday?_adf.ctrl-state=193qichyuu_4&_afLoop=1595016012439636.

resources included in the Renewable Portfolio Standard (RPS)²⁸ and the Strategic Long-Term Resource Planning,²⁹ which specifies a roadmap for providing reliable and sustainable electricity use to customers through 2050. By required compliance with applicable regulations and continued energy efficient programs implemented by the LADWP, the Project's potential impacts regarding wasteful or inefficient use of electricity energy supplies would be less than significant.

Operations - Natural Gas

The Project would generate additional demand for natural gas from the Southern California Gas Company (SoCalGas). Total Project demand for natural gas would be approximately 2,523,025 thousand British thermal units per year (kBTU/year) as estimated by CalEEMod outputs. The existing land use's demand as estimated by CalEEMod is 168 kBTU/year, which would be removed, resulting in a net project demand of 2,522,857 kBTU. According to the California Energy Commission, the County consumed approximately 2,936.69 million therms or 293,598,522,978 kBTU/year of natural gas in 2020.³⁰ The Project would represent approximately 0.001 percent of the natural gas consumption in the County in 2020, a negligible amount relative to Countywide consumption.

In addition, the Project is required to comply with applicable portions of the California Energy Code and CALGreen Code, which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. By required compliance with applicable regulations, the Project's potential to result in impacts regarding wasteful or inefficient use of natural gas energy supplies would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

The City of Los Angeles Department of Building and Safety (LADBS) reviews project site plans to verify compliance with the Building and Energy Efficiency Standards in the California Energy Code prior to issuing a building permit. As a regulatory requirement, the Project would be reviewed for consistency with applicable state and local plans for renewable energy and efficiency. The LAMC incorporates the CALGreen Code Title 24 standards. CALGreen Code standards require projects to provide energy saving features, establish minimum standards for energy efficient construction practices, and require increased energy efficiency. The Project would be built to the codes in effect at the time of construction. The Project Site is located in a TPA and TOC with multiple transit facilities including bus stops and a Metro station nearby and would provide pedestrian entrances to the project from the adjacent to encourage pedestrian and transit use to reduce personal vehicle use. Additionally, the Project incorporates 39 short-term and 165 long-term bicycle parking spaces to encourage active transportation, and 124 EV capable parking spaces to encourage EV use to reduce reliance on gasoline-fueled vehicles. As the Project would comply with regulatory requirements for building efficiency and incorporate features that encourage a reduction in the use of gasoline-fueled vehicles, the Project's potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency would be less than significant.

Mitigation Measures: No mitigation measures are required.

²⁸ LADWP, Power Today, Sustainability, Accessed on October 19, 2020 at: ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-p-power-today?_adf.ctrl-state=193qichyuu_4&_afzLoop=1596243708636711.

²⁹ LADWP, Power Strategic Long Term Resource Plan, December 2017.

³⁰ California Energy Commission, Gas Consumption by County, Los Angeles, Accessed on July 22, 2022 at: <https://ecdms.energy.ca.gov/gasbycounty.aspx>.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| VII. GEOLOGY AND SOILS. | | | | |
| Would the project: | | | | |
| 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. | <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 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? | <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 wastewater disposal systems where sewers are not available for the disposal of wastewater? | <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 geological features? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

The following section incorporates information for the Project Site provided by the Geotechnical Investigation Report (Geotechnical Investigation), dated November 20, 2018, and prepared by Don Soils Engineering Co., which is included as **Appendix F**. The Los Angeles Department of Building and Safety Grading Division issued a Soils Report Approval Letter, dated January 25, 2019, for the Geotechnical Investigation prepared for the Project, which is included as **Appendix G**.

a. i. Less Than Significant Impact. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone³¹, and no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Site. The closest surface trace of an active fault to the Site is the Puente Hills Blind Thrust, located approximately 0.4 miles away from the Project Site.³² This fault or other faults in the area may cause ground-shaking at the site, but the risk of rupture (an offset of ground surface, an extension of a fault rupture to the surface) is considered remote. Therefore, as rupture at the site is considered a remote risk, potential impacts related to fault rupture are less than significant.

Mitigation Measures: No mitigation measures are required.

a. ii. Less Than Significant Impact. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking?

The Project Site is located within a seismically active region, as is all of Southern California. The intensity of ground shaking depends primarily on the earthquake's magnitude, the distance from the source, and the Site's response characteristics. Several active and potentially active faults within the Los Angeles Basin area could affect the Project Site, such as the Puente Hills Blind Thrust Fault, and it is likely that future earthquakes will shake the subject property. The Reports classify the Site as within Seismic Design Category Class E, based on the 2019 California Building Code (CBC) and thus the Project will be subject to the applicable structural regulations in the CBC that address that classification. Seismic Design Categories range from A to F, and the requirements for foundation and structural design will change according to the class in order to compensate for less or more anticipated ground-shaking.

The first foot of soil on the site is uncertified fill, which will be removed completely from the site as the project includes a subterranean garage. Native soils are firm silty sand and clay and the Reports explain that the native soils are suitable for direct support of floor slabs and for either conventional spread footing foundations or mat foundations. Any necessary backfill will utilize excavated native soils, which the Reports indicate are suitable for the purpose, provided they are recompacted according to CBC requirements.

As the Project Site has been found to be suitable for construction, and the applicant is required to design and construct the Project in conformance to the most recently adopted LAMC, which includes CBC requirements for Seismic Design Category Class E structures, and is required to implement all of the approval conditions contained in the Soils Report Approval Letter (Appendix G), and to implement applicable recommendations made in the Geotechnical Investigation (Appendix F), the Project would have less than significant impacts regarding seismically induced ground shaking hazards.

Mitigation Measures: No mitigation measures are required.

a. iii. Less Than Significant Impact. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction?

³¹ City of Los Angeles Zoning Information and Map Access System (ZIMAS), Accessed on July 11, 2022 at: <http://zimas.lacity.org>.

³² City of Los Angeles, ZIMAS, Accessed on July 11, 2022 at: <http://zimas.lacity.org/>.

Liquefaction is a process by which sediments below the water table temporarily lose strength and behave as a viscous liquid rather than a solid. The types of sediments most susceptible are clay-free deposits of sand and silts, although liquefaction may occasionally occur in gravel deposits. Liquefaction can occur when seismic waves, primarily shear waves, pass through saturated granular layers, and distort the granular structure, causing loosely packed groups of particles to collapse.

According to the Geotechnical Investigation, the State of California Seismic Hazard Zone Map indicates that the Project Site is not located within a liquefaction hazard zone. Due to the dense deposits of subsurface soils on the Site, the soil liquefaction potential at the Site is considered negligible. In addition, the Project would comply with applicable City building codes and implement recommendations included in the Geotechnical Investigation. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

a. iv. No Impact. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving landslides?

Landslides are a mass wasting phenomenon in mountainous and hillside areas that include a wide range of movements and occur when the stability of the slopes change to an unstable condition resulting from a number of factors including physical and/or chemical weathering of earth materials, unfavorable geologic structures relative to the slope geometry, erosion at the toe of a slope, and precipitation. The Project Site is a relatively flat infill property, all of which is, or has previously been, developed with commercial structures and/or paved parking areas. There is little topographical variation on the Site and in the surrounding vicinity, which precludes the potential for landslides and/or other hazards associated with hillside properties. In addition, the Site is not located within an earthquake-induced landslide hazard zone on the State of California Seismic Hazard Map. There are no known landslides near the Site, nor is the Site in the path of any known or potential landslides. Therefore, the Project would have no impact related to landslides.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. Would the project result in substantial soil erosion or the loss of topsoil?

Although the Project Site is relatively flat, development of the Project has the potential to result in the erosion of exposed soils during Site preparation and construction activities. All grading activities would require grading permits from the LADBS and must conform to applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. The Project would be required to produce a Stormwater Pollution Prevention Plan (SWPPP) prior to permitting for any ground disturbing activities that demonstrates implementation of Best Management Practices (BMPs) sufficient to minimize erosion and discharge of soil during construction activities. In addition, because the Air Basin is in non-attainment status for PM-10 emissions, the Project must comply with SCAQMD Rule 403 which requires the implementation of best available dust control measures (BACM) during active operations capable of generating fugitive dust. Implementation is handled by the City as a matter of regulatory compliance during permitting, and typical dust control measures that may be implemented to comply with Rule 403 regulations include:

- Apply soil stabilizers or moisten inactive areas.
- Prepare a high wind dust control plan.
- Stabilize previously disturbed areas if subsequent construction is delayed.
- Water exposed surfaces as needed to avoid visible dust leaving the construction area (typically three times/day).

- Minimize in-out traffic from construction zone.
- Sweep streets daily if visible soil material is carried out from the construction area.

Compliance with these regulations would ensure the Project would not result in any significant impacts related to soil erosion during the construction phase.

During operations, the Project would be subject to applicable requirements of the Low Impact Development (LID) Ordinance. Per the ordinance the Project would be required to capture and treat the first 3/4" of rain during a rain event or the amount precipitated during an 85th percentile rain event, whichever is greater.

If flows exceed the design parameters of the management features water would then be directed to offsite storm drains. Stormwater will not at any point travel over bare earth prior to entering the storm drain system. Therefore, through compliance with the LID Ordinance, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and impacts regarding soil erosion or the loss of topsoil would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

As discussed above, the Project is located in a relatively flat area, remote from steep slopes, is not identified as an area susceptible to potential landslides, and is not located within a liquefaction hazard zone. Lateral spreading is a term referring to landslides that form on gentle slopes and have a fluid-like flow movement. There is little topographical variation on the Site and in the surrounding vicinity, which precludes the potential for lateral spreading, and based on the depth to groundwater discussed in the Geotechnical Investigation, liquefaction lateral spreads should not pose any significant hazard to the proposed development.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Site is not located within an area of known ground subsidence, and the Geotechnical Investigation indicates settlement is not expected to exceed 0.75 inches. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Site or in the general Site vicinity. As there is little or no potential for ground subsidence due to withdrawal of fluids or gases at the Site, and the soils on site are not subject to significant subsidence, subsidence impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Based on the Geotechnical Investigation, the subsurface material encountered consisted of uncertified fill (compacted silty, clayey sand) overlying native soils (very stiff, sandy, clayey silt, clayey to slightly clayey to trace clay, and firm to dense sand). The uncertified fill will be removed from site and not utilized in construction, and according to the Geotechnical Investigation the subsurface soils have a low expansion potential. In addition, the Project would comply with applicable City building codes and

implement recommendations included in the Geotechnical Investigation. As such, potential impacts associated with expansive soils would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. **No Impact.** Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The Project Site is located in a developed area of the City, which is served by an existing municipal wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems would be necessary, nor are they proposed. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

f. **Potentially Significant Unless Mitigation Incorporated.** Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological features?

Paleontological resources are the fossilized remains of organisms that have lived in the region in the geologic past and the accompanying geologic strata. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. Sedimentary rocks contain the bulk of fossils in the City, although metamorphic rocks may also contain fossils.³³ As discussed in the Project's Phase I Cultural Resource Assessment (Appendix C.1), a request was made of the NHM to determine if known paleontological resources have been identified on the Site or within the study area. Based on the NHM response, the project is near areas considered to be sensitive for paleontological resources and monitoring during excavation is recommended.

Implementation of **Mitigation Measure GEO-1 (Paleontological Resources)**, identified below, would ensure that if any potential paleontological resources are encountered during construction of the Project, they would be handled according to the proper regulations and any potential impacts would be reduced to less than significant.

Mitigation Measures:

Mitigation Measure GEO-1 (Paleontological Resources)

- a) Prior to grading or excavation a qualified paleontologist shall attend preconstruction meetings to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. In addition, all on-site construction personnel shall receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work.
- b) During grading and excavation a qualified paleontological monitor will be on site during grading below five (5)-feet in depth and all ground-disturbing activities associated with project construction occurring within previously undisturbed fossil bearing formations. If fossils are discovered, the paleontological monitor shall recover them. In most cases, this fossil salvage can be completed in a short period of time; however, some fossil specimens, such as a complete large mammal skeleton, may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. Fossils collected from a disturbed context or that do not warrant additional assessment can be collected, without the need to halt grading.

³³ City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Page D.1-1.

- c) Fossil remains collected during the monitoring and salvage portion of the program shall be cleaned, repaired, sorted, and catalogued. A final data recovery report shall be completed that outlines the results of the monitoring program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.
- d) The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology – USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum – who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
- e) The paleontologist’s survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- f) The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
- g) Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
- h) Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating that no material was discovered.
- i) A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| VIII. GREENHOUSE GAS EMISSIONS. | | | | |
| 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"/> |

Impact Analysis

Emissions of GHG from human activity are implicated in global climate change. These GHGs contribute to an increase in the temperature of the earth's atmosphere by preventing long wavelength heat radiation in some parts of the infrared spectrum from leaving the atmosphere. According to California's 2017 Climate Change Scoping Plan, in California, as in the rest of the world, climate change is contributing to an escalation of serious problems, including raging wildfires, coastal erosion, disruption of water supply, threats to agriculture, spread of insect-borne diseases, and continuing health threats from air pollution. For purposes of planning and regulation, Section 15364.5 of the CCR defines GHGs as including CO₂, CO, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. CO₂ is the primary GHG emitted in California, accounting for 84 percent of total GHG emissions in 2015. Because the warming potential of the identified GHGs differ, GHG emissions are typically expressed in terms of CO₂ equivalents (CO₂e), providing a common expression for the combined volume and warming potential of the GHGs generated by a particular emitter. The total GHG emissions from individual sources are generally reported in metric tons (MT) and are expressed as MT of CO₂ (MTCO₂e).

Fossil fuel combustion in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. The transportation sector, primarily on-road travel, is the single largest source of CO₂ emissions in California. Additionally, about 50 percent of the industrial source emissions of CO₂ are from the refinery and oil and gas sectors. When the industrial source emissions from the oil and gas sectors are attributed to the transportation sector, the emissions associated with transportation amount to approximately half of statewide GHG emissions.

The Global Warming Solutions Act of 2006 (Assembly Bill, or AB, 32) required that the CARB determine the statewide 1990 GHG emission level and approve a statewide GHG emissions limit, equal to the 1990 level, to be achieved by 2020. As reported in the 2017 Climate Change Scoping Plan, California is on track to exceed its 2020 GHG reduction target. Executive Order B-30-15 and SB 32 extended the goals of AB 32 and set a 2030 goal of reducing emissions by 40 percent from 2020 levels.

The following analysis is based on the Air Quality and Greenhouse Gas Impact Analysis, prepared by Envicom Corporation, dated March 2022, and included as Appendix A. The Project's estimated emissions of GHGs during construction and operations were calculated using CalEEMod, which is discussed in Section III. Air Quality. The CalEEMod output sheets are included in Appendix A.

a. Less Than Significant Impact. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

In determining the significance of impacts from GHG emissions, Section 15064.4 of CEQA specifies that a lead agency has the discretion to determine whether to quantify project-related GHG emissions or to rely on a qualitative analysis or performance-based standards. Section 15064.4 also states that a lead agency should consider 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 CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis.

The California Supreme Court's decision in the *Center for Biological Diversity v. California Department of Fish and Wildlife* (62 Cal. 4th 204), also known as the Newhall Ranch Case, reviewed the methodology used to analyze GHG emissions in CEQA. The Supreme Court suggested that a lead agency might assess consistency with AB 32's goal in whole or in part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities as one pathway to determining the significance of a Project's GHG emissions. This approach is consistent with CEQA Guidelines Section 15064, which provides that a determination that an impact is not cumulatively considerable may rely on compliance with previously adopted plans or regulations for the reduction of GHG emissions. The Court also suggested other pathways to compliance, including relying on existing numerical thresholds of significance for GHG emissions (if supported by substantial evidence).

In October 2008, SCAQMD staff proposed the use of a numerical threshold of 3,000 metric tons of CO₂e per year for evaluating GHG impacts of commercial/residential projects, based on meeting the AB 32 emission reduction target. However, SCAQMD has not formally adopted a GHG significance threshold for land use development projects.

Pursuant to the CEQA Guidelines Section 15064.4(a), this evaluation quantifies GHG emissions resulting from the Project. However, in the absence of an adopted numerical threshold by the City, state, or SCAQMD, this analysis relies on a combination of the quantification of GHG emissions as estimated for the Project using CalEEMod and an evaluation of the Project's consistency with relevant local GHG reduction plans to evaluate the Project's GHG impacts.

Construction Impacts

During construction, the Project would temporarily generate GHG emissions from use of construction equipment, and various construction materials (paint, asphalt, etc.) would also result in the short-term generation of GHG emissions. The Project's construction related GHG emissions were modeled using CalEEMod as discussed in the Project's Air Quality and Greenhouse Gas Impact Analysis (Appendix A). Construction emissions have several different types of sources which contribute to emissions of pollutants. These source types include off-road equipment usage, on-road vehicle travel, fugitive dust, architectural coating, and paving off-gassing. GHG emissions generated during construction are shown in **Table V-9, Construction Related Greenhouse Gas Emissions**. As shown in Table V-9, construction activities would generate a total of 1,379.4 MTCO₂e emissions. The SCAQMD's GHG emissions evaluation guidance is to amortize construction emissions over a 30-year lifetime and add them to the projected annual emissions of the project. There have been no proposed impact thresholds for construction emission only as construction emissions represent just a small portion of a project's lifetime emissions. The amortization of construction emissions for the project amount to approximately 46 MTCO₂e emissions annually over 30 years.

Table V-9
Construction Related Greenhouse Gas Emissions

| Source (on-site and off-site) | Total COe |
|--|----------------|
| Demolition | 31.4 |
| Site Preparation | 5.5 |
| Grading | 315.2 |
| Building Construction 2023 | 387.8 |
| Building Construction 2024 | 622.9 |
| Paving | 6.5 |
| Architectural Coating 2024 | 1.4 |
| Architectural Coating 2025 | 8.7 |
| Total | 1,379.4 |
| Source: CalEEMod Version 2020.4.0 output provided in Appendix A. | |

Operations Impacts

Operation of the proposed Project would result in GHG emissions from mobile sources, on-site use of natural gas and landscaping equipment, and off-site sources, such as electricity generation, water distribution and treatment, disposal of solid waste, and treatment of wastewater. The largest source of operational emissions for any new development is typically mobile source emissions, which are associated with residents, workers, customers, and delivery vehicles visiting the land use types in the project. Therefore, one of the keys to reducing emissions for a project is reducing mobile source emissions associated with the project. This is best accomplished through construction of higher density, infill development where public transit, cycling and walking are viable means of transportation, such as the Proposed Project is. The operational generation of GHG emissions were calculated using CalEEMod, as recommended by the SCAQMD. Operational GHG emissions are shown in **Table V-10, Annual Greenhouse Gas Emissions**.

Table V-10
Annual Greenhouse Gas Emissions

| Consumption Source | MTCO ₂ e/year |
|--|--------------------------|
| Area Sources | 4.3 |
| Energy Utilization | 828.8 |
| Mobile Source | 1,573.0 |
| Solid Waste Generation | 78.1 |
| Water Consumption | 165.9 |
| Annualized Construction | 46.0 |
| Total | 2,696.1 |
| Source: CalEEMod Version 2020.4.0 output provided in Appendix A. | |

As shown in Table VIII-1, with the addition of the amortized construction GHG emissions discussed above, the emissions model estimates that the Project would result in annual emissions of approximately 2,696.1 MTCO₂e. Based on this analysis, the Project's quantified construction and operational period GHG emissions would be less than the SCAQMD-suggested screening level of 3,000 MTCO₂e. However, as discussed above, this analysis will use a qualitative discussion of plan consistency to determine the potential significance of the Project's contribution to global GHG emissions and resulting environmental effects.

The Project's ability to comply with various state, regional, and local planning efforts to reduce GHGs are summarized below.

Applicable Plans and Regulations

2020 RTP/SCS

The SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as Connect SoCal,³⁴ demonstrates the region's ability to attain and exceed the State's GHG emission reduction targets. The RTP/SCS is a regional plan for integrating the transportation network and related strategies with an overall land use pattern to accommodate projected growth, housing needs, and transportation demands.

The RTP/SCS focuses the majority of new housing and job growth in High-Quality Transit Areas (HQTAs) and other opportunity areas such as commercial corridors, resulting in more opportunity for transit-oriented development. The Project would be consistent with GHG reduction strategies in the RTP/SCS, which aim to reduce VMT by changing the region's land use and travel patterns, such as providing compact growth in areas accessible to transit, providing jobs closer to transit and in HQTAs, and providing biking and walking infrastructure to improve active transportation options, and transit access.

Los Angeles Green Building Code

The Los Angeles Green Building Code (LAGBC), found in Section IX, Article 9 of the Los Angeles LAMC, is based on the CALGreen Code that was developed and mandated by the state to attain consistency among the various jurisdictions within the state, reduce the building's energy and water use, reduce waste, and reduce the carbon footprint.³⁵ The LAGBC was adopted pursuant to the Los Angeles Green Building Ordinance No. 181,480 to assist in regulating and reducing GHG emissions. The Project would comply with the LAGBC by incorporating water and electricity use efficiency features, and it would meet construction waste diversion requirements. Through regulatory compliance, the Project would be consistent with the provisions of the LAGBC.

Mobility Plan 2035

The Mobility Plan 2035, a subsection of the City General Plan, provides a policy foundation for achieving a transportation system that balances the needs of all road users and includes goals to target GHG emissions reductions through a more sustainable transportation system. Strategies to achieve this goal include utilizing land use policies aimed at shortening the distance between housing, jobs, and services; offering more attractive non-vehicular alternatives; and creating TDM programs to support Citywide reductions in VMT per capita. The Project is consistent with these goals of the Mobility Plan 2035, as it represents urban infill development that would increase land use density within an area that is comprised of high density urban development, and because it would be a mixed-use development providing a combination of hotel, restaurant, and retail uses within the same Project Site. Additionally, the Project would provide long-term and short-term bicycle parking for residents, guests, employees, and customers; solar-ready roof areas; and a total of 124 EV capable parking spaces.³⁶

The Project Site is located in a TOC (Tier 3),³⁷ within approximately 0.4-mile walking distance from two subway stations, and several bus stops serviced by a variety of local and regional carriers are within the project vicinity. The nearest bus stop is located on 8th Street within approximately 65 feet of the project site. The project area is also served by bus transit along 9th Street, Wilshire Boulevard, and Western Avenue,

³⁴ Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Adopted September 3, 2020.

³⁵ Los Angeles Department of Water and Power, Green Building and Sustainability, available at: <https://www.ladbs.org/services/green-building-sustainability>, accessed on July 12, 2019.

³⁶ The number of EV capable spaces and EV charging stations provided will meet or exceed the City's requirements in effect or adopted at the time of permitting for the Project.

³⁷ City of Los Angeles, Department of City Planning, Zoning Information and Map Access System (ZIMAS), Available at <http://zimas.lacity.org/>, Accessed on July 16, 2019.

among many other routes in the vicinity. Bus service in the near vicinity include Los Angeles Department of Transportation's (LADOT) Downtown Area Short Hop (DASH) Wilshire Center/Koreatown routes, as well as multiple lines provided by Metro. These existing area transit features encourage the use of alternative transportation modes that would reduce VMT per capita. Further, the project site and vicinity is served by an existing sidewalk network providing pedestrian access for future residents and users of the project site to the surrounding community, which also encourages use of transportation alternatives that reduce VMT, and would be consistent with the goal of the Mobility Plan 2035 to increase the use of alternative transportation modes.

Green LA Plan and ClimateLA

The Green LA Plan (adopted April 2007) is the City's adopted Climate Action Plan (CAP) that aims to reduce GHG emissions to 35 percent below 1990 levels by 2030 by increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles. To facilitate the implementation of these overarching goals, in 2008 the City adopted ClimateLA, an implementation program that provides detailed information about each action item discussed in the Green LA Plan framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings, to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption. Information about proposed and/or ongoing programs, opportunities for achieving the City's goals, specific challenges, and a list of milestones is provided for each action item. The Green LA Plan includes some action items that only address municipal facilities, and some action items aimed at facilitating changes in the private sector.³⁸

Project consistency with the individual Green LA Plan and ClimateLA actions are included in the Air Quality and Greenhouse Gas Impact Analysis (Appendix A). The Project would not be in conflict with the goals of the Green LA Plan or actions and strategies of ClimateLA to reduce GHG emissions to 35 percent below 1990 levels by 2030 by increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

Sustainable City pLAN 2019 and LA's Green New Deal

The Sustainable City pLAN 2019 provides targets, milestones, and initiatives for reaching short-term and long-term sustainability goals. Implementation of the pLAN includes annual progress reports, as well as major updates to the pLAN every four years. The Green New Deal is the first four-year update to the pLAN, providing more detail on the City's vision for a sustainable future and setting forth accelerated targets. The specified targets of the Sustainable City pLAN 2019 are further discussed in the Air Quality and Greenhouse Gas Impact Analysis (Appendix A).

The Project would be consistent with the emissions reduction and energy and water efficiency targets of the Sustainable City pLAN associated with individual project development, as it would comply with the performance requirements specified in the City's Building Code, including water and electricity use efficiency requirements. The Project would redevelop an underutilized infill property (including a surface parking lot) within an urbanized area, where multiple modes of transportation alternatives are available, including adjacent or nearby bus stops serviced by various routes, a Metro rail station, and pedestrian sidewalks. The Project Site is located within walking distance of multiple office, restaurant, retail, and entertainment opportunities that can be accessed by the Project's residents without the use of personal vehicles. Additionally, the Project would incorporate high-density residential units, live/work units, and commercial space, providing opportunities for future residents to live, work, and shop onsite. Therefore, the Project would promote sustainability and would be consistent with the Sustainable City pLAN.

³⁸ City of Los Angeles, December 2008, ClimateLA Program Document.

Plan Consistency Conclusion

In summary, the Project's net increase in GHG emissions would be below the previously proposed SCAQMD suggested screening threshold of 3,000 MTCO₂e, and as an infill development, subject to current efficiency standards and code requirements, the Project would not conflict with the RTP/SCS, LAGBC, Mobility Plan 2035, the adopted CAP (Green LA), and other related codes and plans developed to reduce GHG emissions in the City, such as the Sustainable City pLAn. Therefore, the Project's potential impacts regarding GHG emissions would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

As described in the evaluation discussed in Section VIII.a., the Project would be consistent with local and regional plans, policies, and regulations adopted for reducing GHG emissions. As such, the Project's potential to result in impacts regarding conflicts with GHG reduction plans would be less than significant.

Mitigation Measures: No mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|-------------------------------------|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <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 that 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 type="checkbox"/> | <input checked="" 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"/> |

The following analysis is based on the Phase I Environmental Site Assessment (Phase I ESA), prepared by Western Environmental Engineers company (WEECO), dated January 24, 2018 and included as **Appendix H**. The analysis is also based on the Project Phase II Environmental Site Assessment Report (Phase II ESA) dated January 29, 2018, prepared by WEECO and provided as **Appendix I**.

Impact Analysis

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

During construction, paints, solvents, fuels for construction equipment, and building materials would be utilized to construct the proposed residential/commercial mixed-use components of the Project. Although

construction of the Project would require the transport, use, and disposal of hazardous waste, construction activities associated with Project would be temporary and required to comply with all applicable federal, state, and local regulations governing such activities. The Project would follow all related requirements set forth by the California Environmental Protection Agency's (CalEPA) Department of Toxic and Substance Control (DTSC), Cal/OSHA and the Los Angeles Regional Water Quality Control Board (LARWQCB) regarding the transport, use and disposal of hazardous waste, construction activities.

During operations, modest amounts of paints, cleaning supplies, and lubricants would be utilized for housekeeping and janitorial purposes to operate/maintain the proposed residential/commercial mixed-use components of the Project. These uses would not be anticipated to result in the routine transport, use, or disposal of hazardous materials in substantial quantities. Further, the materials identified above would be stored, used, and disposed of in accordance with the manufacturer's specifications and all applicable federal, state, and local regulations. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during operations, and potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

According to the Phase I ESA, the Project property has been occupied by multiple commercial tenants and residential dwellings. The Project site parcel associated with 3341 W. 8th Street was previously occupied by a dry-cleaning facility ("Evelyn Cleaners") from 1956 to 1965. No other records regarding the dry-cleaning facility, dry cleaning machine, or any previous subsurface investigation were found, and the condition of the soil was unknown. As such, the Phase I ESA recommended further investigation was necessary to determine subsurface soil conditions and if there was any contamination or leak due to the previous dry-cleaning facility. Subsequently a Phase II ESA was conducted which concluded no remedial action was required.

The Environmental Protection Agency (EPA) developed Regional Screening Levels (RSLs), which are indoor air quality guidelines to evaluate if potential risks associated with encountered chemicals may warrant further evaluation. The Department of Toxic Substances Control (DTSC) Office of Human and Ecological Risk (HERO) developed California specific RSLs for indoor air quality guidelines, and subsequently developed soil gas screening levels (SGSLs) for commercial/industrial land uses. As shown in the Phase II ESA, soil gas samples for PCE, ethylbenzene, m/p-xylene, and o-xylene were lower than the SGLs for commercial/industrial land uses. As such, the Phase II ESA concluded the former dry cleaners site operations did not result in a threat to human health or groundwater beneath the Site, and no further action is required. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

The Site is not located within one-quarter mile of an existing or proposed school. There are schools within an approximately 0.35 mile radius of the Site including Hobart Boulevard Elementary, Harvard Preschool

and Kindergarten, Brawerman Elementary School East, and the Robert F. Kennedy Community Schools complex. However, as discussed above, the Project would use minor amounts of paints, cleaning supplies, and small amounts of petroleum products consistent with other mixed-use residential and commercial properties, and in accordance with all applicable federal, state, and local regulations. Therefore, the Project is not anticipated to emit any hazardous emissions during construction or operation and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. No Impact. Would the project be located on a site that 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?

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A search of the California Environmental Protection Agency's (CalEPA's) Cortese List Data Resources databases³⁹ in the Phase I ESA showed that the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The search involved the following records:

- 1) Department of Toxic Substances Control's (DTSC's) EnviroStor Hazardous Waste and Substances Site List;
- 2) State Water Resources Control Board's (SWRCB's) GeoTracker database for Leaking Underground Storage Tank (LUST) sites, Department of Defense sites, and Cleanup Program sites, as well as GeoTracker irrigated lands, oil, and gas production, operating permitted underground storage tanks (USTs), and Land Disposal sites;
- 3) CalEPA's list of solid waste disposal sites;
- 4) SWRCB's list of Cease and Desist Orders and Cleanup and Abatement Orders; and
- 5) Other information required from the DTSC under Government Code Section 65962.5(a).

The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5, and therefore, the construction and operation of the Project would not create a significant hazard to the public or the environment as a result of being on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As such, no impact related to this issue would occur.

Mitigation Measures: No mitigation measures are required.

e. No Impact. Would the project, 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?

The Project Site is located approximately 9 miles northeast of Los Angeles Airport (LAX) and Santa Monica Airport, and is not located within the Planning Boundary, Airport Influence Area, or Runway Protection Zone of LAX or the Santa Monica Airport.⁴⁰ The Project would not place structures within a

³⁹ California Environmental Protection Agency, Cortese List Data Resources, Accessed on July 12, 2022 at: <https://calepa.ca.gov/sitecleanup/corteselist/>.

⁴⁰ Los Angeles County Department of Regional Planning, Airport Land Use Commission, Airport Influence Area, Accessed on August 1, 2022, at: <https://planning.lacounty.gov/aluc/airports>.

designated flight path, and it would not result in a safety hazard to people working or residing within the Project area regarding aircraft operations in the vicinity. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

f. Less than Significant Impact. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Project Site is located near Western Avenue, Wilshire Boulevard, and Olympic Boulevard, all of which are shown as a Selected Disaster Routes in the Safety Element of the City General Plan.⁴¹ Development of the Project Site may require temporary partial lane closures due to construction activities, but would not require interruption to traffic on those streets, and any lane closures would require a Construction Period Traffic Control Plan to be developed in consultation with the LADOT prior to obtaining a grading permit. While such closures may cause temporary inconvenience on adjacent streets, they would only occur during the construction phase, and for a temporary time period. No complete street closures would occur, and the Project would not substantially interfere with emergency response or evacuation plans. The proposed Project would not cause permanent alterations to vehicular circulation routes or impede public access or travel upon public rights-of-way. Therefore, the potential to interfere with any adopted emergency response plan or emergency evacuation plan would be less than significant.

Mitigation Measures: No mitigation measures are required.

g. No Impact. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The Project Site is located within a highly urbanized portion of the City and is not located in, or in close proximity to, a Very High Fire Hazard Severity Zone (VHFHSZ).⁴² Therefore, no impact related to wildland fire would occur.

Mitigation Measures: No mitigation measures are required.

⁴¹ City of Los Angeles, Department of City Planning, General Plan, Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, Adopted by City Council November 26, 1996.

⁴² City of Los Angeles, ZIMAS, Accessed on July 11, 2022 at: <http://zimas.lacity.org/>.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| X. HYDROLOGY AND WATER QUALITY. | | | | |
| 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 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: | | | | |
| i. Result in substantial on- or offsite erosion or siltation; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv. Impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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"/> |

Impact Analysis

a. Less than Significant Impact. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The SWRCB (State Water Resources Control Board) and Los Angeles Regional Water Quality Control Board (Regional Water Board) have adopted Waste Discharge Requirements (Order No. R4-2012-0175) for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (MS4 Permit). The SWRCB subsequently amended the MS4 Permit on June 16, 2015, (Order WQ 2015-0075). The Los Angeles County MS4 Permit specifies requirements for discharges within the County's Coastal watersheds. This MS4 Permit was issued in accordance with National Pollutant Discharge Elimination System (NPDES) Permit (No. CAS004001). The LAMC also provides Stormwater and Urban Runoff Pollution Control requirements. As a regulatory requirement of these existing MS4

Permits and the LAMC (Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control), the Project would comply with measures designed to prevent the violation of water quality standards or the degradation of ground water quality.

During construction, temporarily exposed soils may be susceptible to erosion and sedimentation due to stormwater runoff. The Project is not steeply sloped and thus not expected to be subject to substantial erosion. However, preparation of a Stormwater Pollution Prevention Plan (SWPPP) is required prior to permitting which is used to demonstrate how Best Management Practices (BMPs) will be used to minimize sediment transport from the site. As the Project would be required to implement BMPs to minimize erosion and sedimentation impacts, and to obtain appropriate permits if conditions require dewatering, construction impacts regarding water quality and waste discharge requirements would be less than significant.

During operations, the Project would be subject to applicable requirements of the Low Impact Development (LID) Ordinance. Per the ordinance the Project would be required to capture and treat the first 3/4" of rain during a rain event or the amount precipitated during an 85th percentile rain event, whichever is greater. This means for the majority of rain events stormwater generated by the Project would remain on-site and would not produce runoff.⁴³ The Project would also be required to be designed such that stormwater flows do not exceed existing conditions. The LID design guidelines require stormwater to be collected and retained or reused on site, or infiltrated on site, as much as practicable. The Site is not suitable for infiltration, as such, the Project will direct stormwater to third, second, and ground floor planters for use and filtration. Stormwater flows which exceed the design capacity of the system will be directed to the City's storm drain system.

The proposed Project would provide improved stormwater performance over the existing conditions as the site was developed without stormwater control requirements. The Project will likely produce less stormwater runoff than the existing conditions, and whatever stormwater does leave the site will be cleaner than under existing conditions. Therefore, Project impacts related to the potential to violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

According to the Phase II ESA, the groundwater depth of the Site ranges from approximately 14 to 34 feet bgs, and regional groundwater is expected to follow the topographic gradient in a southwesterly direction. During construction, excavations may encounter groundwater. Necessary dewatering activities would be performed in compliance with City regulations as well as NPDES discharge requirements. Dewatering during construction would be temporary and would therefore not significantly alter groundwater levels. As such, construction impacts to groundwater levels would be less than significant.

During operations, the Project would be served by the LADWP for potable water supply and does not propose groundwater extraction. The proposed Project will cover the entirety of the site with impermeable surfaces; however, the amount of existing exposed surfaces is minimal and the Site would not contribute significantly to groundwater recharge. Therefore, the Project would not substantially deplete groundwater

⁴³ City of Los Angeles, LA Sanitation, Planning and Land Development Handbook for Low Impact Development, Part B, 5th Edition, May 9, 2016.

supplies or substantially interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Thus, groundwater quantity impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.i. Less than Significant Impact. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial on- or offsite erosion or siltation?

The Project Site is located in an urbanized area of the City and is currently developed with structures and paved parking areas. No streams or rivers pass through the Site. Stormwater runoff leaving the Site is conveyed by existing gutters to the storm drain system. As discussed above, the Project would be required to comply with the City's LID Ordinance to manage the quantity and quality of stormwater runoff. The LID Ordinance sets standards and practices to maintain the hydrologic character of a development site, reduce off-site runoff, and improve water quality. During construction, the Project would be required to prepare and implement BMPs such as sandbag use, to minimize sediment transport to off-site drainage facilities to minimize erosion and sedimentation impacts. During operations, the Project would comply with the LID Ordinance requirements, and the Project would capture and treat stormwater runoff through stormwater planters. Therefore, the potential for the Project to substantially alter the existing drainage pattern of the area resulting in substantial on- or off-site erosion or siltation would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.ii. Less than Significant Impact. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

No streams or river courses are located on the subject property. Per the City's LID design guidelines, the Project Site will be designed such that it will not exceed the existing stormwater flows, and the majority of rain events will not result in stormwater leaving the Site. As such, the Project will not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

As discussed above, the proposed Project would not result in a significant increase in stormwater runoff as it would be required to incorporate BMPs to retain and treat runoff in accordance with the City's LID Ordinance. The Project will likely produce less stormwater runoff than the existing conditions, and whatever stormwater does leave the site will be cleaner than under existing conditions. Therefore, the Project would not substantially increase runoff volumes that could affect the existing capacity of the stormwater drainage system or provide substantial additional sources of polluted runoff to the existing drainage system, or otherwise substantially degrade water quality, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iv. No Impact. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

The Project Site is located within Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Zone X, meaning it is determined to be outside of the 0.2 percent annual chance floodplain and is considered an “area of minimal flood hazard.”⁴⁴ As the Project Site is outside of a flood zone it would not substantially alter the existing drainage pattern of an area within a flood zone that would lead to impediment or redirection of flood flows, and there would be no impact.

Mitigation Measures: No mitigation measures are required.

d. No Impact. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

As stated above, the Project Site is located within FEMA FIRM Zone X, meaning it is determined to be outside of the 0.2 percent annual chance floodplain and is considered an “area of minimal flood hazard.” The Project Site is not located in a or tsunami⁴⁵ zone, and it is not located in proximity to any large body of water subject to seiche conditions, such as a reservoir. As the Project is located within an urban environment and no surface water bodies are located on or near the Project Site, no impact pertaining to the risk of release of pollutants due to the Site’s location in flood hazard, tsunami, or seiche zones would occur.

Mitigation Measures: No mitigation measures are required.

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

The urban infill Project Site was previously disturbed by the placement of impervious surfaces and development, and it does not propose groundwater extraction. The Project would be required to comply with the existing Regional Water Board Waste Discharge Requirements that are specified in the MS4 Permit. In compliance with the City’s LID requirements, the Project would capture and treat stormwater through stormwater planters. The proposed Project would provide improved stormwater performance over existing uses, as the existing conditions do not meet LID requirements and stormwater leaves the site untreated. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁴⁴ Federal Emergency Management Agency (FEMA), National Flood Hazard Layer FIRMette, Accessed on July 13, 2022 at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>.

⁴⁵ City of Los Angeles, ZIMAS, Accessed on July 11, 2022 at: <http://zimas.lacity.org/>.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------------|--|------------------------------------|-----------|
|--|--------------------------------------|--|------------------------------------|-----------|

XI. LAND USE AND PLANNING.

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> |

Impact Analysis

- a. **No Impact.** Would the project physically divide an established community?

The Project Site is a relatively small infill property of 1.45 acres, located within a highly urbanized area. The Site is currently developed with structures and parking and is surrounded by existing development, including multi-family residential and commercial uses. Regarding the surrounding land uses, the Project would provide a mix of residential and commercial uses that would be consistent with other land uses in the surrounding area and compatible with the surrounding community. As such, the Project would therefore not physically divide an established community and no impact would occur.

Mitigation Measures: No mitigation measures are required.

- b. **Less Than Significant Impact.** Would the project cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Various local and regional plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies of SCAG's RTP/SCS, the City's General Plan (including the Framework Element), the Wilshire Community Plan, and the LAMC, to the extent that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect. The Project's consistency with certain other goals, objectives, and policies that do not directly relate to the avoidance or mitigation of environmental effects is also briefly discussed for informational purposes.

As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. Therefore, Project impacts related to land use and planning would be less than significant, as expanded below.

Southern California Association of Governments 2020-2045 RTP/SCS (Connect SoCal)

Compliance with SCAG's 2020-2045 RTP/SCS (Connect SoCal) is discussed in Section III, which concludes that the Project would not conflict with the applicable goals and policies Connect SoCal. As such, impacts would be less than significant.

City of Los Angeles General Plan

The General Plan is a comprehensive, long-range declaration of purposes, policies, and programs for the development of the City. There are two components to the General Plan that constitute its land use element, the Framework Element, and the various Community Plans. The Framework Element contains general goals, policies, and objectives that address land use and serves as a guide for updating the community plans. The Framework Element establishes categories of land use -- Neighborhood District, Community Center, Regional Center, Downtown Center, and Mixed-Use Boulevard -- that are broadly described by ranges of intensity/density, heights, and lists of typical uses. The Community Plans are essentially 35 land use elements each covering one of 35 community areas that make up the City. The Project is within the Wilshire Community Plan area. The Wilshire Community Plan further refines land use objectives through a number of stated goals and objectives.

The Project proposes a General Plan Amendment (GPA) to the Wilshire Community Plan to re-designate the Project Site from Neighborhood Office Commercial to Regional Commercial Center. This land use designation is applied to properties located within areas intended to provide a concentration of social and economic activity referred to as “regional centers.” The Framework Element defines regional centers as such:

Regional centers are intended to serve as the focal points of regional commerce, identity, and activity.

They are typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Generally, regional centers will range from FAR 1.5:1 to 6:1 and are characterized by six- to twenty-story (or higher) buildings as determined in the community plan. Their densities and functions support the development of a comprehensive and inter-connected network of public transit and services.

The Project site is located one block south of the Wilshire Center Regional Commercial Center, which runs along Wilshire Boulevard and is generally bounded by 3rd Street on the north, 8th Street on the south, Hoover Street on the east, and Wilton Place on the west. Wilshire Center Regional Commercial Center is a dense collection of high-rise office buildings, large hotels, regional shopping complexes, churches, entertainment centers, and high-rise and low-rise apartment buildings.

Changing the land use designation from Neighborhood Office Commercial to Regional Commercial Center would allow the Project to meet its target density and provide 251 residential units, including 29 income-restricted units, and 18,000 square-feet of retail commercial space and 22,500 of office space, which fulfills the purpose of the Regional Commercial Center land use designation and is consistent with the stated objectives of the Wilshire Community Plan, which include the following:

Residential

- 1) **Objective 1-1:** Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area...
- 2) **Objective 1-2:** Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.
- 3) **Objective 1-3:** Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.
- 4) **Objective 1-4:** Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.

Commercial

- 1) **Objective 2-1:** Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.
- 2) **Objective 2-2:** Promote distinctive commercial districts and pedestrian-oriented areas.
- 3) **Objective 2-3:** Enhance the visual appearance and appeal of commercial districts.

The Project meets all of the above objectives by providing 251 residential units that include live/work, studio, and one and two-bedroom units, with 16 very-low income and 13 extremely low income restricted units in an attractive development that includes ground-floor retail and second-floor office space within a transit-rich environment.

As an infill development of an underutilized property along the commercial corridor of 8th Street, the Project would fulfill the objectives of the Wilshire Community Plan and would not conflict with the applicable goals and policies of the City's Community Plan, and impacts would be less than significant.

Mobility Plan 2035

The Mobility Plan 2035 provides a policy foundation for achieving a transportation system that balances the needs of all road users and includes goals to target GHG emissions reductions through a more sustainable transportation system. Conformance with Mobility Plan goals are discussed elsewhere in the document in Sections VIII.a. and XVCII.a.

Los Angeles Municipal Code (LAMC)

The Project Site is comprised of multiple parcels. The Project parcel containing the single-family house and the two parcels adjacent to it are zoned PB-1 (Parking Building Zone, Height District 1), the remaining majority of the Site is zoned C2-1 (Commercial Zone, Height District 1). The Project is requesting a Zone Change from PB to C2, and a Height District Change from C2-1 to C2-2 to allow for height of 88'6 and FAR of 4.64:1. These requested changes do not produce nor otherwise result in a significant impact. Potential impacts from a change that includes greater FAR and height would be related to aesthetics and density. As explained in Section I aesthetics may not be considered an impact, and the density of the project has been evaluated throughout the document and no significant impacts related to it have been discovered. In addition, it is not necessary to scrutinize the potential impacts of minor adjustments to zoning development requirements as such minor adjustments do not produce discernable environmental impacts. Such minor adjustments are allowed by the LAMC (and other means) to allow flexibility as the development requirements of any given zone cannot possibly capture all of the permutations of development that may be appropriate for any given site. As this document analyses the Project as a whole such minor changes are nonetheless accounted for in the analysis, but analysis on an individual level is not necessary.

A change of zone could also potentially create an impact by creating a new use incompatible with its surroundings. There is no such impact in this case as the Proposed Project is fully compatible and appropriate for its surroundings. Per the LAMC, the C2 General Commercial Zone is intended to permit a wide range of retail and commercial services, professional offices, and medical facilities. The Project proposes a mixed-use development with two levels of subterranean parking and residential and commercial uses, which fulfills the requested zoning's purpose of providing a wide range of retail and commercial services. In addition, the surrounding area is primarily developed with commercial and medium- to high-density residential uses. Commercial uses with C2 zoning near the Project include local and regional serving retail and restaurant establishments and offices, and residential development in the area is primarily multi-family. The surrounding commercial and residential uses are similar to the Project's proposed uses, and therefore the zone change would not create an impact. Thus, the Project would be consistent with the City

General Plan and the City Zoning Ordinance, and it has been evaluated elsewhere for compliance with the Noise Element, Mobility Plan, and other applicable land use documents, and therefore would not conflict with a plan, policy, or regulation with the purpose of mitigating an environmental effect, and therefore impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Potentially Significant Less than Significant Impact | No Impact |
|--|--------------------------------------|--|--|-------------------------------------|
| XII. MINERAL RESOURCES. | | | | |
| Would the project: | | | | |
| a. Would the project result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a. No Impact. Would the project result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?

The Project proposes infill development within an urban setting currently occupied by commercial uses. According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, no oil wells are identified on-site.⁴⁶ The California Department of Conservation Mineral Land Classification Map, shows the Project Site is located within a Mineral Resource Zone (MRZ)-3, meaning areas containing mineral deposits the significance of which cannot be evaluated from available data.⁴⁷ According to the City Conservation Element, the property is not located in a mineral resource zone area.⁴⁸ The site therefore is not designated as a locally important mineral resource recovery site as delineated on a local general plan, specific plan, or other land use plan. Since no mineral resources are known to exist within the Project Site the development would not result in the loss of availability of known mineral resources or a locally important mineral resource recovery site. As such, no impact associated with the loss of availability of a known mineral resource would occur.

b. No Impact. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The Project proposes infill development within an urban setting currently occupied by commercial uses. According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, no oil wells are identified on-site.⁴⁹ The California Department of Conservation Mineral Land Classification Map, shows the Project Site is located within an MRZ-3 zone, meaning areas containing mineral deposits the significance of which cannot be evaluated from available data.⁵⁰ According to the City Conservation Element, the property is not located in a mineral resource zone area.⁵¹ The site therefore is not designated as a locally important mineral resource recovery site as delineated on a local general plan, specific plan, or

⁴⁶ City of Los Angeles, Zoning Information and Map Access System (ZIMAS), Accessed on July 11, 2022 at: <http://zimas.lacity.org/>.

⁴⁷ California Department of Conservation, Special Report 143, Plate 2.10, Mineral Land Classification Map, 1979.

⁴⁸ City of Los Angeles, Conservation Element of the City of Los Angeles General Plan, Exhibit A- Mineral Resources, Adopted by the City Council September 26, 2001.

⁴⁹ City of Los Angeles, Zoning Information and Map Access System (ZIMAS), Accessed on July 11, 2022 at: <http://zimas.lacity.org/>.

⁵⁰ California Department of Conservation, Special Report 143, Plate 2.10, Mineral Land Classification Map, 1979.

⁵¹ City of Los Angeles, Conservation Element of the City of Los Angeles General Plan, Exhibit A- Mineral Resources, Adopted by the City Council September 26, 2001.

other land use plan. Since no mineral resources are known to exist within the Project Site the development would not result in the loss of availability of known mineral resources or a locally important mineral resource recovery site. As such, no impact associated with the loss of availability of a known mineral resource would occur.

Mitigation Measures: No mitigation measures are required.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Potentially Significant Less than Significant Impact | No Impact |
|---|--------------------------------------|--|--|-------------------------------------|
| XIII. NOISE. | | | | |
| 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 checked="" type="checkbox"/> | <input 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"/> |

Impact Analysis

The following discussion assesses the potential noise impacts of the Project and provides a brief description of the key terms and concepts used in the analysis of noise impacts. This analysis is primarily based on the Project's Noise Impact Analysis, prepared by Envicom Corporation, which is included as **Appendix J**.

Noise is unwanted sound. Sound is mechanical energy that is transmitted by pressure waves through a compressible medium such as air. The sound pressure level, expressed in decibels (dB), has become the most common descriptor used to characterize the loudness of an ambient sound level. A dB is a logarithmic unit of the ratio of sound pressure to a reference sound pressure level, standardized as 20 micropascals, the threshold of human hearing. Sound or noise can vary in intensity by over one million times within the range of human hearing, so a logarithmic loudness scale similar to the Richter Scale is used to keep sound intensity numbers manageable. The human ear is not equally sensitive to all sound frequencies within the entire spectrum, so noise levels at maximum human sensitivity are factored more heavily into sound descriptions in a process called A-weighting written as dB(A) or dBA. Subsequent references to decibels written as dB should be understood as A weighted dB(A).

Time variations in noise exposure are typically expressed in Leq, a steady-state energy level equal to the energy content of the time varying period. Leq provides a statistical description of the sound level that is exceeded over some fraction of a given observation period. Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, state law requires that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL), a weighted average of noise levels over time.

a. Potentially Significant Unless Mitigation Incorporated. Would the project result in 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?.

Based on the Noise Element of the City General Plan, a 55 dB CNEL exposure is considered the most desirable target for the exterior of noise sensitive land uses such as homes, hotels, and schools. It is also recognized that such a level may not always be possible in areas of substantial traffic noise intrusion. Exposures up to 70 dB CNEL for such uses are considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dB CNEL are considered normally unacceptable except in unusual circumstances.

The City's noise standards for non-transportation sources are articulated in Noise Ordinances that regulate noise from one land use crossing the property line of an adjacent property line. Noise ordinances contained in Chapter IX, Noise Regulation, of the LAMC restrict the level of noise that one type of land use or activity may broadcast across an adjacent land use. Noise Ordinance standards are stated with respect to ambient levels found without the contribution of an identified noise source. Section 111.03, Minimum Ambient Noise Level, of the LAMC establishes presumed ambient noise levels as a function of zoning and times of day to be used as an evaluation baseline. The Project Site is zoned PB-1 and C-2-1, which the LAMC indicates would have a presumed ambient noise level of 60 dBA in daytime hours and 55 dBA in nighttime hours. Where the actual ambient noise level is measured and is found to be higher than the presumed ambient levels, the LAMC states that the actual ambient level shall be used as a baseline. To obtain existing ambient noise levels at the Project Site, Envicom Corporation measured noise levels in 15-minute intervals at four locations on site discussed in Appendix J. Measured ambient noise levels ranged from 67.1 dB to 56.7 dB Leq. Therefore, the average of the measured noise levels, 62.7 dB Leq, was used as the existing daytime ambient noise level for the purpose of this study.

During the daytime, some deviation from these standards is allowed for short-term (less than 15 minute) noise generation. The Noise Ordinance numerical standards apply to "stationary" sources of noise generation (mechanical equipment such as air conditioning, refrigeration, heating, or pumping). If such activities are not specifically prohibited by the Noise Ordinance, the noise constraint for general stationary sources is that they may not increase the ambient level by more than 5 dB above⁵² ambient (measured or presumed minimum) levels associated with the zoning.

The limit of perceptibility by humans in a laboratory environment is around 1 dB. Under ambient conditions, people generally do not perceive that a noise level has clearly changed until there is a 3 dB difference. Because of this, an increase of 3 dB is often used to define "substantial increase" for the purpose of determining noise impacts for projects when the existing noise environment already exceeds the City's standards for noise-sensitive land uses. Therefore, an increase of 3 dB CNEL in traffic noise would be considered a significant impact.

Construction Noise Impacts

Construction noise is governed by Noise Ordinance limitations on allowable times of equipment operations. Chapter XI of the LAMC limits construction activities to the hours of 7:00 a.m. and 9:00 p.m. on weekdays and 8:00 a.m. to 6:00 p.m. on any Saturday. Construction is not permitted on any national holiday or on any Sunday.

In addition, LAMC Section 112.05 prohibits the use of any powered equipment or powered hand tool for construction within a residential zone or within 500 ft thereof that produces a maximum noise level exceeding 75 dB(A) at a distance of 50 feet from the source. However, this noise limitation does not apply where compliance is technically infeasible despite the use of mufflers, shields, sound barriers or any other noise reduction device or techniques.

⁵² City of Los Angeles Municipal Code Section 111.02.

The Construction Noise Handbook prepared by the Federal Highway Administration (FHA) includes a national database of construction equipment reference noise emissions levels. The FHA uses these reference noise emission levels in their Roadway Construction Noise Model. The FHA handbook also provides an acoustical usage factor to estimate the fraction of time each piece of equipment is operating at full power during construction. The acoustical usage factor, abbreviated (U.F.), is a key input used to calculate sound levels averaged over time expressed as Leq. The sound level prediction equation is expressed as follows for the hourly average sound level (Leq) at distance (D) between the source and receiver.

$$Leq = L_{max} @ 50' - 20 \cdot \log (D/50') + 10 \cdot \log (U.F./100) - I.L.$$

Where:

L_{max} @ 50' is the published reference noise level at 50 feet

U.F. is the acoustical usage factor for full power operation per hour

I.L. is the insertion loss for intervening barriers

Table V-11, Estimated Unmitigated Construction Equipment Max Noise, lists construction equipment types and quantities anticipated to be used during Project construction. The table describes the maximum noise level for each individual piece of equipment at a 50-foot distance between the equipment and receptor as specified in LAMC Section 112.05, and then adjusts that noise level according to the U.F. equation to show the expected hourly Leq for each piece of equipment.

Table V-11
Estimated Unmitigated Construction Equipment Max Noise

| Equipment (Quantity) | L _{max} @ 50 ft. (dB) ² | U.F. ^{1, 2} | U.F. Calculation | Reduction | Hourly Leq (dBA) |
|------------------------|---|----------------------|-------------------|-----------|------------------|
| Concrete Saw | 90 | 20% | 10 • log (20/100) | -6.99 | 83 |
| Tractor/Loader/Backhoe | 84 | 40% | 10 • log (40/100) | -3.98 | 80 |
| Rubber Tired Dozer | 82 | 40% | 10 • log (40/100) | -3.98 | 78 |
| Grader | 85 | 40% | 10 • log (40/100) | -3.98 | 81 |
| Crane | 81 | 16% | 10 • log (16/100) | -7.96 | 73 |
| Forklift (man lift) | 75 | 20% | 10 • log (20/100) | -6.99 | 64 |
| Generator Set | 81 | 50% | 10 • log (50/100) | -3.01 | 78 |
| Loader/Backhoe | 79 | 40% | 10 • log (40/100) | -3.98 | 75 |
| Welder | 74 | 40% | 10 • log (20/100) | -6.99 | 67 |
| Cement Mixer | 79 | 40% | 10 • log (40/100) | -3.98 | 75 |
| Paver | 77 | 50% | 10 • log (50/100) | -3.01 | 74 |
| Paving Equipment | 77 | 50% | 10 • log (50/100) | -3.01 | 74 |
| Roller | 80 | 20% | 10 • log (20/100) | -6.99 | 73 |
| Air Compressor | 78 | 40% | 10 • log (40/100) | -3.98 | 74 |

¹ Usage Factor (U.F.) is the portion of time equipment is operating at full power during construction.

² Data Source: Federal Highway Administration, Construction Noise Handbook, Chapter 9, Construction Equipment Noise Levels and Ranges, accessed August 28, 2018. Noise levels (L_{max} @ 50 feet dB) are calculated based on the maximum number of each type of equipment to be used (shown in parenthesis in column one), assuming as a worst-case that they operate simultaneously in the same location.

As shown in Table V-10, based on the acoustical U.F. for the time each piece of equipment is operating at full power during construction, the loudest piece of equipment would be a concrete saw at 83 dBA at a distance of 50 feet from the source. Construction proceeds in phases such as demolition, site preparation, grading, building construction, paving, and architectural coating. Therefore, at any particular phase of construction, contractors would use only the types of equipment needed as shown in Table XIII-1, rather than using all the equipment throughout all phases. Furthermore, decibels are logarithmic units; therefore, sound levels cannot be added by ordinary arithmetic means. When the sound pressure level of two sources is equal, the resulting noise level is 3 dB greater than the noise level of one source. Nonetheless, the

predicted maximum noise levels would exceed the construction noise threshold of 75 dBA at a distance of 50 feet specified in LAMC Section 112.05.

Although compliance with LAMC Section 112.05 would require the use of barriers, mufflers, or other means to reduce noise levels to acceptable levels, **Mitigation Measures NOI-1 and NOI-2** are applied to ensure technically feasible noise reduction measures are taken to reduce maximum noise levels to acceptable levels.

MM-NOI-1: Construction Equipment:

1. All construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
2. Pneumatic tools used at the site shall be equipped with an exhaust muffler on the compressed air exhaust to minimize noise levels.
3. Back-up beepers for all construction equipment and vehicles shall be broadband sound alarms or adjusted to the lowest noise levels possible, provided that Occupational Safety and Health Administration (OSHA) and California OSHA safety requirements are not violated. On vehicles where back-up beepers are not available, alternative safety measures such as escorts and spotters will be employed.

MM-NOI-2: Enclosures or barriers shall be placed around concrete saws and generators when they operate on site. Alternatively, a temporary noise control barrier shall be installed on the northern property line of the construction site's abutting residential uses. The enclosures or barrier(s) shall be designed to reduce noise levels from each individual piece of equipment to the performance standard of 75 dBA Leq at a distance of 50 feet from the equipment to the extent feasible. Such barriers could include a minimum 8-foot-high temporary barrier with a minimum sound transmission (STC) rating of 26, erected along the northern property line. This barrier could be constructed in one of the following ways:

1. From acoustical blankets hung over or from a supporting frame. The blankets shall be firmly secured to the framework. The blankets shall be overlapped by at least 4 inches at seams and taped and/or closed with hook-and-loop fasteners (i.e., Velcro®) so that no gaps exist. The largest blankets available shall be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier.
2. From commercially available acoustical panels lined with sound-absorbing material (the sound-absorptive faces of the panels should face the construction equipment).
3. From common construction materials such as plywood provided that the barrier is designed with overlapping material at the seams to assure that no gaps exist between the panels.

MM-NOI-3: Noticing:

1. The construction management company's name and telephone number(s) shall be posted at a least one location along each street frontage that borders the project site.
2. A designated point of contact shall be identified to address noise-related complaints during construction. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint

(e.g., starting too early, bad muffler) and will be required to implement reasonable measures such that the complaint is resolved.

Table V-12, Construction Noise Reductions, identifies the hourly average (Leq) noise levels generated when an appropriate noise attenuation device is implemented.

Table V-12
Construction Noise Reductions

| Equipment | Leq at 50 ft (dB) ^(a) | Reduction Feature ^(b) and Attenuation (dB) | Reduced Leq at 50 ft (dB) | Exceeds 75 dB at 50 ft (Yes/No) |
|--|----------------------------------|---|---------------------------|---------------------------------|
| Concrete Saw | 83 | Enclosure (10 dB) | 73 | No |
| Tractor/Loader/Backhoe | 80 | Industrial Muffler or Barrier (15 dB) | 65 | No |
| Rubber Tired Dozer | 78 | Industrial Muffler or Barrier (15 dB) | 63 | No |
| Grader | 81 | Industrial Muffler or Barrier (15 dB) | 66 | No |
| Crane | 73 | N/A | 73 | No |
| Forklift (man lift) | 64 | N/A | 75 | No |
| Generator Set | 78 | Enclosure (10 dB) | 68 | No |
| Loader/Backhoe | 75 | N/A | 75 | No |
| Welder | 67 | N/A | 67 | No |
| Cement Mixer | 75 | N/A | 75 | No |
| Paver | 74 | N/A | 74 | No |
| Paving Equipment | 74 | N/A | 74 | No |
| Roller | 73 | N/A | 73 | No |
| Air Compressor | 74 | N/A | 74 | No |
| ^(a) Source: Federal Highway Administration, Construction Noise Handbook, 2006, Chapter 9, Construction Equipment Noise Levels and Ranges. | | | | |
| ^(b) Pursuant to LAMC Section 112.05, the Project would incorporate use of mufflers, acoustical blankets, enclosures, barriers, screens and/or other noise reduction device or techniques during the operation of the equipment. | | | | |

The reduced noise levels shown in Table V-11 demonstrate that incorporation of **NOI-1, NOI-2, and NOI-3** construction equipment noise would not exceed 75 dB at 50 feet, which would comply with the LAMC Section 112.05 restrictions on construction equipment noise levels and reduce impacts to less than significant levels.

Operational Impacts

Pursuant to LAMC Section 112.02, the Project would be considered to exceed operational Noise Ordinance standards if it would increase the ambient noise level on another property by more than 5 dB. As discussed previously, the average of the measured noise levels, 62.7 dB Leq, was used as the existing daytime ambient noise level for the purpose of this study.

Heating, Ventilation, and Air Conditioning Noise

During operations, the Project's rooftop Heating, Ventilation, and Air Conditioning (HVAC) units could potentially be a source of noise affecting existing ambient noise levels in the immediate vicinity. This analysis assumes all roof-mounted HVAC units, shown on the Project architectural plans, are in simultaneous use as a "worst-case" scenario, although actual HVAC use will depend on weather conditions and tenant occupancy. Based on the sound pressure levels specified in the manufacturer's specification sheet, each HVAC unit would produce a noise level of 57 dB at 3.3 feet. Based on this level, 255 HVAC units would produce a combined reference noise level of 76.4 dB at 3.3 feet. This noise level would be

reduced by distance attenuation and insertion loss from the roofline and parapet. In addition, the HVAC would not operate at full power all the time, further reducing average noise levels. **Table V-13, HVAC Noise Levels** shows noise levels from Project HVAC at the nearest property line and associated increases in ambient noise levels. As shown on Table XIII-2, ambient daytime noise levels would increase by 0.6 dB and ambient nighttime noise levels would increase by 2.9 dB above existing levels. Therefore, operational HVAC noise would not exceed the ambient noise level at the property nearest property line more than 5 dB, in compliance with LAMC Section 112.02. In addition, the noise level increases due to Project HVAC would be less than perceptible. Therefore, HVAC noise effects would be less than significant.

Table V-13
HVAC Noise Levels

| Time | Noise Level at 3.3 feet (dB) | Distance to Property Line (ft) | Distance Attenuation (dB) | Insertion Loss (dB) ¹ | U.F. Reduction (dB) ² | HVAC Leq at Property Line (dB) | Ambient Noise Level (dB) | Noise Increase (dB) |
|------------------------------|------------------------------|--------------------------------|---------------------------|----------------------------------|----------------------------------|--------------------------------|--------------------------|---------------------|
| Day 7:00 a.m. – 10:00 p.m. | 76.4 | 16 | 13.7 | 5 | 3 | 54.7 | 62.7 ^a | 0.6 |
| Night 10:00 p.m. – 7:00 a.m. | 76.4 | 16 | 13.7 | 5 | 3 | 54.7 | 55 ^b | 2.9 |

Source: Envicom Corporation, Noise Study: The Parks in LA Project, July 18, 2019.

¹ Noise reduction from Project roofline and parapet.

² Usage Factor (U.F.) is the assumed portion of time HVAC equipment is operating at full power. A U.F. of 50% results in a 3 dB noise reduction.

^a Average of measured ambient noise levels.

^b LAMC Section 111.03 establishes a presumed ambient noise levels of 55 dBA for the PB and C2 zones during the night.

Traffic Noise

Long-term operational noise impacts from mixed uses result from vehicular noise on area roadways. Upon completion, Project-generated vehicle trips would cause an incremental increase in noise levels on local streets throughout the Project area. When considering the combined effects of operational noise sources, noise levels cannot be added by arithmetic means because decibels are expressed in logarithmic units. As doubling the noise source would produce only a 3 dBA increase in the noise level, a doubling of traffic volume is required to result in a 3 dBA increase in noise.⁵³ Increases of 3 dB are the point at which changes are barely perceptible to the human ear. Based on the Project Transportation Impact Report, the Project would generate a net increase of 1,247 daily vehicle trips.⁵⁴ Based on Los Angeles Department of Transportation traffic counts for the intersection nearest to the Project site, Harvard Blvd and W. 8th Street, there were of a total of 10,134 trips at this intersection.⁵⁵ The addition of 1,247 trips resulting from the Project to the 10,134 trips at the Harvard Blvd and W. 8th Street intersection would less than double the existing traffic volume; therefore, the proposed Project would not result in a 3 dB noise increase from

⁵³ California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, page 2.15.

⁵⁴ Transportation Impact Report for Proposed The Parks at LA (3433 8th Street) Mixed Use Project, Crain and Associates, September 2019.

⁵⁵ 2,969 north and southbound vehicles and 7,165 east and westbound vehicles measured between the hours of 7:00 a.m. through 10:00 a.m. and 3:00 p.m. through 6:00 p.m. = 10,134 vehicles. City of Los Angeles, Department of Public Works, Bureau of Engineering, Navigate LA, LADOT Traffic Data, Harvard Blvd and W. 8th Street, March, 12, 2012. Accessed on NavigateLA (July 8, 2019).

operational traffic. The Project's operational traffic noise increase would be less than perceptible, and the impact would be less than significant.

Landscape Maintenance Noise

Project operations would include the use of lawn mowers, backpack blowers, edgers, and landscape maintenance equipment for site upkeep and operations. Contractors would reasonably be expected to conduct routine landscape maintenance during daytime hours, therefore avoiding the period when such equipment noise is restricted between 10:00 p.m. and 7:00 a.m. required by LAMC Section 112.04.

Conclusion

As discussed in the above evaluations, with implementation of the mitigation measures the Project's potential noise impacts from construction and operations would be less than significant.

Mitigation Measures:

MM NOI-1 (Construction Equipment)

1. All construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
2. Pneumatic tools used at the site shall be equipped with an exhaust muffler on the compressed air exhaust to minimize noise levels.
3. Back-up beepers for all construction equipment and vehicles shall be broadband sound alarms or adjusted to the lowest noise levels possible, provided that Occupational Safety and Health Administration (OSHA) and California OSHA safety requirements are not violated. On vehicles where back-up beepers are not available, alternative safety measures such as escorts and spotters will be employed.

MM NOI-2 (Enclosures or Barriers)

Enclosures or barriers shall be placed around concrete saws and generators when they operate on site. Alternatively, a temporary noise control barrier shall be installed on the northern property line of the construction site's abutting residential uses. The enclosures or barrier(s) shall be designed to reduce noise levels from each individual piece of equipment to the performance standard of 75 dBA Leq at a distance of 50 feet from the equipment to the extent feasible. Such barriers could include a minimum 8-foot-high temporary barrier with a minimum sound transmission (STC) rating of 26, erected along the northern property line. This barrier could be constructed in one of the following ways:

1. From acoustical blankets hung over or from a supporting frame. The blankets shall be firmly secured to the framework. The blankets shall be overlapped by at least 4 inches at seams and taped and/or closed with hook-and-loop fasteners (i.e., Velcro[®]) so that no gaps exist. The largest blankets available shall be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier.
2. From commercially available acoustical panels lined with sound-absorbing material (the sound-absorptive faces of the panels should face the construction equipment).
3. From common construction materials such as plywood provided that the barrier is designed with overlapping material at the seams to assure that no gaps exist between the panels.

MM NOI-3 (Noticing)

1. The construction management company's name and telephone number(s) shall be posted at a least one location along each street frontage that borders the project site.
2. A designated point of contact shall be identified to address noise-related complaints during construction. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler) and will be required to implement reasonable measures such that the complaint is resolved.

b. Less Than Significant Impact. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities generate ground-borne vibration when heavy equipment travels over unpaved surfaces or is engaged in soil movement. The effects of ground-borne vibration may include discernable movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. Ground vibration is quickly damped out within the softer sedimentary surfaces of much of Southern California. Because vibration is typically not an issue, very few jurisdictions have adopted vibration significance thresholds. Vibration thresholds have been adopted for major public works construction projects, but these relate mostly to structural protection (cracking foundations or stucco) rather than to human annoyance.

A vibration descriptor commonly used to determine structural damage is the peak particle velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second (in/sec). The Caltrans damage criterion of 0.3 PPV in/sec is appropriate for intermittent vibration in older residential structures.

The on-site construction equipment used in construction of the Project that would create the maximum potential vibration is a small bulldozer. The reference vibration level for such equipment is 0.003 PPV in/sec at 25 feet from the source, according to the FTA's Transit Noise and Vibration Impact Assessment Manual.⁵⁶ The nearest building to the Project site is a multi-family residence at 743 S. Harvard Boulevard at the northern property line of the Project site, built in 1954. When a small bulldozer would operate at a distance 2.5 feet between source and receptor, the predicted vibration level would be 0.09 PPV in/sec, below a level that could create structural damage in older residential buildings (i.e., 0.3 PPV in/sec). Groundborne vibration of 0.09 PPV in/sec would not exceed the guideline for causing a strongly perceptible human response (i.e., 0.1 PPV in/sec) and would have a temporary nuisance effect on residents within the adjacent multi-family residential building within the hours for construction allowed under the LAMC. As the Project's construction vibration would not result in potential structural damage or human annoyance, impacts would be considered less than significant.

Mitigation Measures: No mitigation measures are required.

c. No impact. Would the project result in, 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?

The Project is neither located within an airport land use plan nor within two miles of a public use airport that would expose people residing or working in the Project area to excessive noise levels. The airports

⁵⁶ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

closest to the Project Site are the Santa Monica airport located approximately 8.4 miles to the southwest and Los Angeles International Airport, located approximately 9.0 miles to the southwest. The Project Site is located far outside the 65 dB CNEL noise contours for the airports, which are the lowest noise contours mapped.^{57,58} Therefore, the Project would have no impact with regard to this issue.

Mitigation Measures: No mitigation measures are required.

⁵⁷ Los Angeles County Airport Land Use Commission, Santa Monica Airport: Airport Influence Area, May 13, 2003, Accessed on July 8, 2022 at: https://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf.

⁵⁸ Los Angeles World Airports, Los Angeles International Airport, Noise Contour Map: First Quarter 2022, May 4, 2022, Accessed on July 8, 2022 at: <https://www.lawa.org/lawa-environment/noise-management/lawa-noise-management-lax/california-state-airport-noise-standards-quarterly-reports-and-contour-maps>.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Potentially Significant Less than Significant Impact | No Impact |
|--|--------------------------------------|--|--|-----------|
|--|--------------------------------------|--|--|-----------|

XIV. POPULATION AND HOUSING.

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <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 checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

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

The Project Site is currently occupied with commercial buildings, one residential dwelling, and surface parking, and is served by existing infrastructure, including roads, utilities, and public services. The SCAG 2020-2045 Regional RTP/SCS⁵⁹ forecasts for population and employment growth from 2016 through 2045 for the City are shown in **Table V-14, Population and Employment Growth Forecast for City of Los Angeles**.

Table V-14
Population and Employment Growth Forecast for City of Los Angeles

| Year | City Population | City Employment |
|--|-----------------|-----------------|
| 2016 ^(a) | 3,933,800 | 1,848,300 |
| 2045 | 4,771,300 | 2,135,900 |
| Net Growth | 837,500 | 287,600 |
| Source: SCAG 2020-2045 RTP/SCS, Demographics & Growth Forecast Technical Report, Table 14, Jurisdictional-Level Growth Forecast. | | |
| ^(a) 2016 is the base year data used in the 2020-2045 RTP/SCS. | | |

As shown in Table XIV-1, SCAG forecasts City population and employment to increase from 2016 to 2045 by 837,500 people and 287,600 jobs, respectively. Based on a conservative rate of 2.88 people per household in the SCAG population and household numbers for 2016 (which shows larger households than 2045), the 251 Project dwelling units would have a population of 722, which would represent less than one percent (0.09 percent) of the projected 2016 to 2045 City population increase. The Project would also help address the City's housing shortage. The sixth cycle Regional Housing Needs Assessment (RHNA) has determined the City must plan for 456,643 new dwelling units, including 184,721 low income or very low income units, between 2021 and 2029.⁶⁰ The Project provides 251 dwelling units, including 29-income restricted units, which is beneficial to the City's housing efforts. **Table V-15, Project Employment By**

⁵⁹ Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Adopted September 3, 2020.

⁶⁰ City of Los Angeles, 2021-2029 Housing Element, Chapter 1: Housing Needs Assessment, November 24, 2021.

Land Use, estimates the number of employment opportunities the Project would provide based upon square-footage per employee.

Table V-15
Project Employment By Land Use

| Land Use | Size (Square Feet) | Building Area per Employee (Square Feet) | Project Potential Employment |
|---|-------------------------------|---|---|
| Commercial retail | 18,000 | 511 | 35 |
| Office | 22,500 | 305 | 74 |
| Total Employees | | | 109 |
| Source: Part V., Table 4B, Los Angeles County of the Employment Density Study Summary Report, Prepared for SCAG, The Natelson Company Inc., with Terry A. Hayes Associates, October 31, 2001. | | | |

As calculated the Project would accommodate approximately 109 employees, which would represent less than one percent (0.04 percent) of the projected 2016 to 2045 City employment increase. As such, the Project-related population and employment figures would be within local and regional projections and would not cause substantial growth that would exceed projected levels for the year of occupancy. As the proposed Project would not cause a substantial increase in residential population or employment or extend existing or new infrastructure that would indirectly induce population growth, the Project would result in less than significant impacts associated with population growth. Further, the project would have a positive impact with regard to contributing 251 dwelling units (including 29-income restricted units) to the City's RHNA goals.

Mitigation Measures: No mitigation measures are required.

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

The Project Site is currently developed with commercial structures and a separate single-family residence. The project would remove one dwelling unit, but construct 251 new dwelling units, resulting in a net increase of 251 dwelling units, with 29 income-restricted units. Therefore, the Project would have a less than significant impact regarding displacement of existing housing units or people.

Mitigation Measures: No mitigation measures are required.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------------|--|------------------------------------|-----------|
|--|--------------------------------------|--|------------------------------------|-----------|

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:

| | | | | |
|-----------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

a. Less than Significant Impact. 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 fire protection?

The Project is urban infill development and would construct a mixed-use structure consisting of residential, retail commercial, and office uses. Existing land uses surrounding the Project Site include commercial buildings and multi-story, multi-family residential structures. The Project Site is currently served by existing LAFD fire stations in the vicinity, which would serve the proposed Project. The nearest fire station to the Project Site is LAFD Fire Station 29, located at 4029 West Wilshire Boulevard, 0.9 driving miles northwest from the Project Site.⁶¹ Other LAFD fire stations in the Project Site vicinity and approximate distances include Station 13 (1.5 mile), Station 11 (1.9 miles), and Station 26 (2.2 miles).

The Project would be required to submit plans to the LAFD for review and approval of all fire prevention and safety features. These requirements include on-site fire suppression features such as building sprinklers and fire-safe emergency egress routes, plus the provision of adequate access to the building, fire flow pressure and fire hydrant placement per the City code. The existing structures to be removed were not built to modern fire codes and do not feature contemporary fire prevention, safety, and suppression features such as sprinklers. Therefore, construction of the Project will result in an improvement in fire safety over the previous uses. Based on the close proximity of multiple LAFD stations and required compliance with City code and LAFD site plan review requirements, the Project would not require new construction or expansion of existing fire stations, and potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁶¹ Los Angeles Fire Department, Find Your Station, Accessed on July 8, 2022 at: <https://www.lafd.org/fire-stations/station-results>.

b. Less Than Significant Impact. 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 police protection?

The Project Site is located in the Olympic division of the Los Angeles Police Department's (LAPD's) West Bureau. The Olympic Community Police Station, located approximately 1.3 driving miles southeast of the Project Site, serves the neighborhoods of Koreatown and Arlington Heights.⁶² Within the Olympic Area, the Project Site is located within Reporting District (RD) 2033. RD 2033 is defined by the following boundaries: Wilshire Boulevard to the north, Harvard Boulevard to the east, San Marino Street to the south, and S. Western Avenue to the west.⁶³

Emergency calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services, police units are most often in a mobile state; hence, the distance between a headquarters facility and the location of a particular emergency does generally not determine response time. Instead, the number of police officers on the street is more directly related to the realized response time.

Construction

During construction, the Project Site could potentially attract trespassers and/or vandals that could result in unsafe conditions for the public. Due to the temporary nature of Project construction, such potential impacts would not require the construction or expansion of police facilities to serve the Project Site or maintain service response times. The Project would be required to limit access to the Project Site during construction to address potential trespass. The LAMC requires the placement of temporary walls surrounding vacant lots and requires that project applicants maintain the temporary construction wall free from graffiti (Chapter 1, Section. 14.4.17). Compliance with LAMC requirements would ensure that construction impacts to police services are less than significant.

Operation

The Project is an infill development that would construct a mixed-use structure providing residential, retail commercial, and office uses, replacing existing commercial uses and a single-family residence. The Project would introduce minimal population growth to the City, representing less than one percent (0.09 percent) of the projected 2016 to 2045 population increase, as discussed in Section XIV, Population and Housing, and would positively contribute to the City's housing shortage. Only a nominal change in the ratio of police personnel to community population in the Wilshire area would occur, and because the Project is within an already densely populated area that is routinely patrolled, it is not creating a new locus of density that requires new police attention or personnel. Therefore, the proposed Project would not result in a substantial increase in the service area's population such that new or physically altered police facilities would be needed to maintain current response times. The Project would provide lighting along the perimeter, driveway entrances, and within the parking structure for safety, security, and wayfinding purposes. Additional safety features proposed would include gated entrances to parking areas within the Project. Therefore, potential operational impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁶² Los Angeles Police Department, Olympic Community Police Station, Accessed on July 8, 2022 at: <https://www.lapdonline.org/lapd-contact/west-bureau/olympic-community-police-station/>.

⁶³ Los Angeles Police Department, Olympic Division Map, Accessed on July 8, 2022 at: <https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/03/OLYM11x17.pdf>

c. Less Than Significant Impact. 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 schools?

The Project Site is located within the service areas of the following LAUSD public schools: Hobart Boulevard Elementary School (K-5), Berendo Middle School (6-8), and multiple high schools within the RFK High Schools Zone of Choice (9-12).⁶⁴ The Project would replace existing commercial uses and a single-family residence with 251 new residential dwelling units and retail commercial and office uses. The 250 net dwelling unit increase would introduce minimal population growth, as discussed in Section XIV, Population and Housing, and therefore would not generate a substantial increase in the number of students attending LAUSD schools. It is anticipated that employees of the commercial and office components of the Project would generally not relocate to the vicinity as a result of the Project, and therefore the Project would not generate additional demand of school facilities in the area. Further, the project will be required to pay school fees, which are deemed to fully avoid direct impacts under CEQA (California Government Code 65996(a)). Based on the above, the Project would not result in a need for new or expanded school facilities, the construction of which could result in a physical impact on the environment. The Project would have a less than significant impact to schools.

Mitigation Measures: No mitigation measures are required.

d. Less Than Significant Impact. 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 parks?

The City Department of Recreation and Parks provides park and recreation facilities at 27 locations within two miles of the Project Site that include a variety of recreation opportunities. These locations include the Seoul International Park (Ardmore Recreation Center), Country Club Park Heritage Plaza, Normandie Recreation Center, Shatto Recreation Center, Harold A. Henry Park, Lafayette Multipurpose Community Center, Lafayette Skate Park, West Adams Heights Park, Burns (Robert L.) Park, MacArthur Park Lake, LA High Memorial Park, Occidental Parkway, MacArthur Park, and MacArthur Park Community Center.⁶⁵

The Project would provide on-site recreation amenities for use by residents, including a wading pool, jacuzzi, grill, fire pits, fitness room, game room, and party room, which would reduce the Project's demand for off-site recreation services within the local area. Further, the project would not result in a substantial increase in population (see Section XIV) and thus would not be expected to generate a substantial new increase in demand for park services. Therefore, the Project would not substantially increase the demand for existing recreation and park services that would require new or expanded park facilities. Impacts would be less than significant. Potential impacts to park and recreation facilities are discussed in Section XV, Recreation.

Mitigation Measures: No mitigation measures are required.

⁶⁴ Los Angeles Unified School District, Resident School Identifier, Accessed on July 8, 2022 at: <https://rsi.lausd.net/ResidentSchoolIdentifier/>.

⁶⁵ City of Los Angeles, Department of Recreation and Parks, Facility Map Locator, Accessed on July 8, 2020 at: [https://www.laparks.org/maplocator?cat_id=45&geo\[radius\]=2&geo\[latitude\]=34.0578105&geo\[longitude\]=-118.3044414&address=3433%20W%20th%20St,%20Los%20Angeles,%20CA%2090005,%20USA](https://www.laparks.org/maplocator?cat_id=45&geo[radius]=2&geo[latitude]=34.0578105&geo[longitude]=-118.3044414&address=3433%20W%20th%20St,%20Los%20Angeles,%20CA%2090005,%20USA).

e. Less Than Significant Impact. A project could have a significant environmental impact if it would require new or expanded other public services in the vicinity, the construction of which could result in significant environmental impacts for other public facilities?

The Los Angeles Public Library (LAPL) maintains a branch library facility, the Pio Pico – Koreatown Branch Library, 0.4 driving miles northwest of the Project Site at 694 S. Oxford Avenue. The Filipe de Neve Branch Library is also located 1.6 driving miles northeast of the Project Site, and the Pico Union Branch Library is located 1.9 driving miles southeast of the Project Site.⁶⁶ The proposed 251 residential dwelling units, commercial uses and office uses would not result in a substantial increase in population (see Section XIV) and thus would not be expected to generate new demand on existing library services that would necessitate the construction of new or expanded library facilities to continue to serve the public. As such, potential impacts on library services would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁶⁶ Los Angeles Public Library, Branches, Accessed on July 11, 2022 at: <https://www.lapl.org/branches>.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| XVI. RECREATION. | | | | |
| 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Analysis

a. Less Than Significant Impact. 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?

The City Department of Recreation and Parks provides park and recreation facilities for public use throughout the City, including the Project vicinity. Public park facilities located within two miles of the Project Site include the Seoul International Park (Ardmore Recreation Center), Country Club Park Heritage Plaza, Normandie Recreation Center, Shatto Recreation Center, Harold A. Henry Park, Lafayette Multipurpose Community Center, Lafayette Skate Park, West Adams Heights Park, Burns (Robert L.) Park, MacArthur Park Lake, LA High Memorial Park, Occidental Parkway, MacArthur Park, and MacArthur Park Community Center.⁶⁷

The Project would consist of 251 new residential dwelling units and commercial and office uses, which would not result in substantial employment or population growth, as discussed in Section XIV, Population and Housing. The Project would provide on-site recreation amenities for use by residents, including a wading pool, jacuzzi, grill, fire pits, fitness room, game room, party room, screen room, and business center, which would reduce the potential need for residents to use off-site recreation facilities within the Project area. In addition, LAMC Section 12.33 requires all new non-exempt (market rate) residential dwelling units to dedicate land and/or pay a fee (Quimby fees) for the purpose of acquire, expand, and improve park and recreational facilities.⁶⁸ The project would therefore contribute funds that would help prevent the deterioration of recreational facilities. As such, the Project is not anticipated to substantially increase park usage and would not result in the substantial deterioration of physical facilities of local park and recreation facilities, and impacts would be less than significant.

⁶⁷ City of Los Angeles, Department of Recreation and Parks, Facility Map Locator, Accessed on July 8, 2020 at: [https://www.laparks.org/maplocator?cat_id=45&geo\[radius\]=2&geo\[latitude\]=34.0578105&geo\[longitude\]=-118.3044414&address=3433%20W%20th%20St,%20Los%20Angeles,%20CA%2090005,%20USA](https://www.laparks.org/maplocator?cat_id=45&geo[radius]=2&geo[latitude]=34.0578105&geo[longitude]=-118.3044414&address=3433%20W%20th%20St,%20Los%20Angeles,%20CA%2090005,%20USA).

⁶⁸ City of Los Angeles, Department of Recreation and Parks, Park Fees, Accessed on July 26, 2022 at: <https://www.laparks.org/planning/park-fees>.

Mitigation Measures: No mitigation measures are required.

b. No Impact. 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?

As discussed in section XVI. a., above, the Project's residential amenities would include on-site recreation facilities within the proposed structure for use by residents. The Project does not propose to construct or expand park facilities. Therefore, the Project would have no impact on the environment related to the construction or expansion of recreational facilities.

Mitigation Measures: No mitigation measures are required.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| XVII. TRANSPORTATION. | | | | |
| 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. Would the project 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"/> |

Impact Analysis

The following section incorporates information provided by the Transportation Impact Report (“TIR”) dated September 2019, prepared by Crain & Associates, included as **Appendix K.1**; the Supplemental Vehicle Miles Traveled Analysis (“Supplemental Analysis”) dated May 29, 2020 by Crain & Associates, included as **Appendix K.2**, and the Inter-Departmental Correspondence letter from the City (“DOT letter”) dated June 29, 2020, included as **Appendix L**. The TIR analyzed traffic impacts according to the standards in place at the time, which were primarily concerned with Level of Service (LOS). Shortly after completion of the TIR the requirements of SB 743 were implemented statewide, which required CEQA analysis to be based on potential VMT impacts rather than LOS. Subsequently, the Supplemental Analysis was produced which analyses the potential for project VMT impacts. The DOT letter is an assessment by the LADOT of the completeness and adequacy of the two Crain & Associates reports. It concludes the combination of the two reports adequately assesses VMT impacts and the project’s effects on nearby traffic infrastructure.

The DOT letter concludes that the two reports are adequate for assessment purposes, and that the Project will have no VMT impacts. The DOT letter also recommends two corrective measures to be included in a list of Project requirements, which include off-site improvements and creation of an on-site Transportation Demand Management program. Neither measure relates to a CEQA impact and do not have bearing on this analysis except as it relates to the design of physical infrastructure improvements.

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

The primary transportation planning document for the City is the Mobility Plan 2035, which is the transportation element of the General Plan. The Plan is structured around five goals: Safety First; Access for All Angelenos; World Class Infrastructure; Collaboration, Communication, and Informed Choices; Clean Environments & Healthy Communities. The Plan identifies policies for each of these goals which are primarily concerned with the design and use of public rights of way, with an emphasis on pedestrian experience and the provision of more multi-modal transportation opportunities throughout the City.

The Project would not conflict with the objectives of the Mobility Plan 2035. It constrains vehicle access to one ingress and one egress point, and emphasizes pedestrian access as much as practicable with multiple points of entry on each street frontage. The sidewalks on Harvard Boulevard and 8th Street will be widened three feet by dedication, and all sidewalks repaired per City requirements. The vehicle access points are minimal in size and the curb aprons designed so that accessible paths along the sidewalk are minimally interrupted. Short term commercial bike parking is provided in two locations, and secured long term bike storage is provided for residents and employees. As the Project is within a TPA, the 251 units combined with robust pedestrian connectivity and bicycle facilities ensures the Project is not in conflict with and in fact helps further the goals of the Mobility Plan 2035.

A Transportation Improvement and Mitigation Program was prepared for the Wilshire Community Plan Area (TIMP) that analyzes land use impacts on transportation, which was originally adopted in 2001. Apart from community-level concerns regarding physical infrastructure within the area, most of the applicable goals of the TIMP are reflected in the Mobility Plan 2035. Further, the TIMP is primarily concerned with actions to be taken by the City and most policies are not directly applicable at the project level. However, the Project does positively further these goals from the TIMP in the same manner as the Mobility Plan 2035:

Goal 10: Develop Additional Public Transit Services Which Improve Mobility with Efficient, Reliable, Safe, Convenient Alternatives to Automobile Travel

Goal 11: Encourage a System of Safe, Efficient and Attractive Bicycle and Pedestrian Facilities

Goal 12: Encourage Alternative Modes of Transportation to Reduce Single-Occupancy Vehicular Trips.

The relationship between the TIMP and Mobility Plan 2035 is demonstrated in Goal 16, which was added by amendment after adoption of the Mobility Plan:

Goal 16: To the Extent Feasible and Consistent with The Mobility Plan 2035's and Community Plans' Policies Promoting Multi-Modal Transportation And Safety, Provide a Community-Wide Circulation System of Freeways and Streets Which Supports Existing and Planned Land Uses and Anticipated Traffic Flow Volumes, While Maintaining Acceptable Levels of Service at Intersections.

Conformance with local traffic concerns within the TIMP is primarily effectuated through compliance with the LADOT's Transportation Assessment Guidelines (TAG), which establishes criteria for project review objectives and requirements, provides instructions and sets standards for preparation of a transportation assessment in the City of Los Angeles. The TAG was updated in 2019 to conform to the requirements of SB 743 and to be consistent with and implement the City of Los Angeles CEQA Thresholds Guide. The Project's TIS was developed in agreement with the LADOT prior to adoption of the TAG, however, as mentioned above the DOT letter determined the TIS and Supplemental Analysis adequately analyzed transportation issues according to current standards. The corrective measures to be applied to the Project are related to local traffic, and conformance with them will ensure the Project is not in conflict with any aspect of the TIMP.

Other applicable transportation-related plans would include the City's Vision Zero Los Angeles Initiative and the Citywide Design Guidelines. Vision Zero seeks to implement traffic safety treatments at intersections and along roadway segments to improve safety for pedestrians, bicyclists, and other vulnerable road users. The Project would not preclude or conflict with the implementation of future Vision Zero

projects in the public right-of-way. The Citywide Design Guidelines has three guidelines related to transportation policy:

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

The Project's emphasis on pedestrian access from all street frontages, limiting auto access points, and semi-open pedestrian plaza-like atmosphere in the ground floor commercial areas, including the public parklet, all conform to the three guidelines. In conclusion, the Project does not conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

SB 743 was enacted in September 2013, changing the way transportation impact analysis is conducted under CEQA. These changes include the elimination of auto delay, Level of Service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant traffic impacts under CEQA.

LADOT's TAG requires a project VMT analysis when a project would generate a net increase of 250 or more daily vehicle trips and generate a net increase in daily VMT. A project will then have a potential impact if it will generate VMT exceeding 15% below the existing average VMT for the Area Planning Commission (APC) area in which it is located. There are seven Area Planning Commission (APC) sub-areas within the City, the Project is within the Central APC sub-area. The VMT impact thresholds for this APC, taking into account the 15% reduction goal, are a daily household VMT per capita of 6.0, and a daily work VMT per employee of 7.6.

Based on the VMT calculator, the residential portion of the Project would generate a household VMT per capita of 5.6. As this is under the household VMT threshold of 6.0, VMT impacts would be less than significant pertaining to the Project's residential component. The VMT calculator determined the commercial portion of the Project would generate a work VMT per employee of 5.8. As this is under the work VMT threshold of 7.6, VMT impacts would be less than significant pertaining to the Project's work component. Therefore, the Project's potential to conflict with CEQA Section 15064.3 subdivision (b) would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Project does not include any design features that are unusual or introduce any incompatible uses. The Project design, including driveway access, and any off site repairs or improvements, will be subject to City review during plan check prior to permitting to ensure all City design standards are met. The Project will not change the physical placement of adjoining curbs and will not affect the design of adjacent roadways. The uses being introduced, retail commercial, offices, and multifamily residential, are appropriate for the location and typical for the surroundings. Therefore, the Project would not increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less Than Significant Impact. Would the project result in inadequate emergency access?

The Project Site is located near Western Avenue, Wilshire Boulevard, and Olympic Boulevard, all of which are shown as Selected Disaster Routes in the Safety Element of the City General Plan.⁶⁹ Development of the Project Site may require temporary partial lane closures due to construction activities, in which case the Project would be required to produce a Construction Period Traffic Control Plan in consultation with the LADOT prior to obtaining any associated permit. No complete street closures would occur, and any partial closures would only cause temporary inconvenience during the construction phase on the streets adjacent to the Project site; no designated disaster routes would be affected.

The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction and during operations. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD plan review, which is required prior to the issuance of a building permit. Therefore, the Project's potential impact regarding emergency access would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁶⁹ City of Los Angeles, Department of City Planning, General Plan, Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, Adopted by City Council November 26, 1996.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------------|--|------------------------------------|-----------|
|--|--------------------------------------|--|------------------------------------|-----------|

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:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| 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)? | <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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

a. Less Than Significant Impact. 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)?

As discussed above in Section V, Cultural Resources, the Phase I Cultural Resource Assessment of the project site found no record of cultural resources within the site or surrounding buffer area. The assessment also requested NAHC review of the Sacred Lands File which returned a negative result. This does not preclude the possibility that unknown resources may exist on the Project Site and be uncovered during ground-disturbing activities, however that potential is addressed below in XVIII.b, below. Therefore, based upon the lack of evidence project impacts on a landscape, sacred place, or object with cultural value to a California Native American tribe 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), would be less than significant.

b. Potentially Significant Unless Mitigation Incorporated. 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

As discussed above, there are no known tribal resources on the site, and little evidence the site should be considered likely to contain a tribal resource. However, as mentioned above, there is the potential that previously undiscovered cultural resources could be uncovered during ground-disturbing activities. The condition of the parcel, and specifically the presence of tribal resources prior to the initial development and subsequent redevelopment on the property, is unknown, and therefore ground disturbance could result in impacts to tribal resources found significant under PRC § 5024.1 if such a resource was disturbed, destroyed, or otherwise improperly treated. As such, archaeological monitoring of initial ground disturbance related to the Project, up to approximately five feet in depth or when a qualified archaeologist has recommended that the possibility of encountering archaeological material has been exhausted, is included as a mitigation measure.

Mitigation Measure TCR-1 requires archaeological monitoring of initial ground disturbance, and has set forth procedures to ensure that any finds that are exposed during construction activities for the proposed project are properly handled and treated. Upon incorporation of Mitigation Measure TCR-1, impacts to tribal cultural resources would be less than significant.

Mitigation Measures:

MM TCR-1: Tribal Cultural Resource Archaeological Monitoring

The applicant shall retain an archaeological monitor that meets the Secretary of Interior qualifications will be on site during removal of the property pavement and grading of the first five feet of soil. The frequency of monitoring shall be determined by the archaeological monitor based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus fill soils), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered.

1. In the event that archaeological resources are unearthed during ground-disturbing activities the Project Permittee shall immediately stop all ground disturbance activities and contact the following:
 - a. All California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; and,
 - b. The Department of City Planning at 213.978.1454.
2. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Project permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
3. The Project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the Project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
4. The Project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

5. If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation.
6. The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.
7. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.
8. Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| XIX. UTILITIES AND SERVICE SYSTEMS. | | | | |
| Would the project: | | | | |
| a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <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"/> |

Impact Analysis

a. Less than Significant Impact. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

As urban infill development that would replace existing buildings on a Project Site currently served with existing public utilities infrastructure, the Project would not result in the relocation or substantial expansion of that infrastructure. See Section XIX.b for an analysis of water supply and XIX.c for an analysis of wastewater capacity. As urban infill, the Project would generate a marginal net increase in population, and thus would not result in a substantial new demand for electric power, natural gas, and telecommunications facilities relative to existing demand for such services in the City. The Project's potential stormwater effects and required compliance with stormwater management and treatment regulations are discussed in Section X, Hydrology and Water Quality. As discussed in these evaluations, the Project's potential to result in significant environmental effects related to relocation or construction of new or expanded utility infrastructure would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Potable water is supplied to the existing uses on the Project Site and surrounding vicinity by the LADWP via an extensive distribution system, comprised of 7,336 miles of distribution pipes, 115 storage tanks and reservoirs, and a total storage capacity of 323,820 acre-feet.⁷⁰ According to the 2020 Urban Water Management Plan (UWMP), the LADWP has sufficient water supplies available for average weather years through the Year 2045 with existing passive conservation, as well as for single dry years and multiple dry years. Water supplies for 2045 for an average weather year are projected by the UWMP to be 710,500 acre-feet per year (AFY).⁷¹ The following water demand calculations are based on the proposed residential, office space (associated with live-work units), and commercial uses.

The Project's future water demand is shown in **Table V-16, Project Water Demand**. For a conservative evaluation, the projected demand shown in Table XIX-1 does not consider the proposed removal of existing uses, in determining a net water demand for the Project.

Table V-16
Project Water Demand

| Type of Use | Size | Demand Rate ^(a) | Water Demand (gpd) |
|--|------------------------|----------------------------|--------------------|
| Residential: Apt. - Bachelor/Single | 95 units | 96/unit | 9,120 |
| Residential: Apt. 1 Bedroom | 131 units ^b | 144/unit | 18,864 |
| Residential: Apt. 2 Bedroom | 25 units | 192/unit | 4,800 |
| Office Building | 15,500 sf | 180/1,000 sf | 2,790 |
| Commercial | 25,000 sf | 96/1,000 sf | 2,400 |
| Total Project Demand | | | 37,974 |
| ^(a) L.A. CEQA Thresholds Guide (2006), Exhibit M.2-12. Water demand assumed to be 120 percent of wastewater generation. ^(b) Includes 113 one-bedroom units and the 18 live-work units. Office space associated with the live-work units is included in "Office Building" category. gpd = gallons per day sf = square feet | | | |

As shown in Table XIX-1, the Project's water demand would be approximately 37,974 gallons per day (gpd), or 42.6 AFY, which is a small fraction of one percent (i.e., 0.006 percent) of the LADWP's projected water demand for the Year 2045. As such, the LADWP would have sufficient water supplies available to serve the Project.

The LADWP is tasked with long-range planning to evaluate future water supply availability and demand to meet the City's needs, including projections for reasonably foreseeable development. The City has adopted several plans, including the Sustainable City pLAN 2019 (LA's Green New Deal), which among other sustainability strategies, include water conservation strategies and targets, including a goal of reducing potable water use per capita by 22.5 percent by 2025; and 25 percent by 2035. All new development projects in the City, including the proposed Project, would be required to be constructed with water conservation fixtures as mandated by the LAGBC. The LAMC Section 99.04.303.4 requires that new development projects demonstrate that a 20 percent reduction in potable water use will be achieved within the building based on maximum allowable water use plumbing fixtures required by the LAGBC.

⁷⁰ LADWP, "Facts and Figures," https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=152d50xss1_4 (accessed October July 11, 2022).

⁷¹ LADWP Urban Water Management Plan: 2020, approved May 25, 2021.

As evaluated above, the LADWP would have sufficient water supplies to serve the Project and reasonably foreseeable future development accounted for in the UWMP, and the Project and reasonably foreseeable future development would be required to incorporate water conservation features to meet codified reduction targets. Therefore, the Project's potential to result in a substantial environmental impact due to insufficient water supplies would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The Los Angeles Bureau of Sanitation (LA Sanitation) provides wastewater conveyance infrastructure and treatment service for the City, including the existing land uses on the Project Site.⁷² Wastewater generated from the Project Site is conveyed to the Hyperion Treatment Plant. Currently, an average wastewater flow rate of nearly 275 million gallons per day (mgd) is generated in the system. The Hyperion Treatment Plant has the capacity to treat 450 mgd and therefore has excess capacity of approximately 175 mgd.⁷³

The Project's estimated wastewater generation is provided in **Table V-17, Project Wastewater Generation**. For a conservative evaluation, the Project's wastewater generation shown in Table XIX-2 does not consider the proposed removal of existing uses in determining future wastewater generation for the Project.

Table V-17
Project Wastewater Generation

| Type of Use | Size | Demand Rate ^(a) | Wastewater Generation (gpd) |
|---|-----------|----------------------------|-----------------------------|
| Residential: Apt. – Bachelor/Single | 95 units | 80/unit | 7,600 |
| Residential: Apt. 1 Bedroom | 131 units | 120/unit | 15,720 |
| Residential: Apt. 2 Bedroom | 25 units | 160/unit | 4,000 |
| Office Building | 15,500 sf | 150/1,000 sf | 2,325 |
| Commercial | 25,000 sf | 80/1,000 sf | 2,000 |
| Total Project Demand | | | 31,645 |
| ^(a) L.A. CEQA Thresholds Guide (2006), Exhibit M.2-12. ^(b) Includes 113 one-bedroom units and the 18 live-work units. Office space associated with the live-work units is included in "Office Building" category. Gpd = gallons per day sf = square feet | | | |

As shown in Table XIX-2, the Project would generate approximately 31,645 gpd, which is a small fraction of one percent (i.e., 0.018 percent) of the excess treatment capacity at Hyperion Treatment Plant. Pursuant to the City Sewer Allocation Ordinance (No. 166060), in order to avoid prematurely committing treatment capacity to projects still in the environmental review or entitlement process, LA Sanitation does not determine sewer capacity availability for a proposed project until the LADBS has established that a project's plans and specifications are acceptable for plan check. This process ensures that the system can accept the anticipated wastewater flows from a project at the time of connection. However, based on current

⁷² LA Sanitation, Sewers, Accessed on July 11, 2022 at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?_adf.ctrl-state=101rkaq8yo_5&_afLoop=1945382053351572#!.

⁷³ A Sanitation, Hyperion Water Reclamation Plant, Accessed on July 11, 2022 at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwtp/s-lsh-wwd-cw-p-hwtp-tp?_adf.ctrl-state=uacs7refx_10&_afLoop=9235779714429943#!.

capacity and flow rates at Hyperion Water Reclamation Plant, the LA Sanitation wastewater treatment system would have sufficient capacity for the Project's wastewater in addition to the existing treatment commitments. The Project's potential to result in a significant environmental impact regarding sufficient wastewater treatment capacity would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. Would the project 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?

Solid waste generated by the Project is subject to certain State requirements for waste diversion and separation. The California Integrated Waste Management Act (AB 939) has been followed by a series of assembly bills including AB 341, AB 1826, and AB 876, which results in the Project being required to separate recyclables and organic waste, such as food waste, compostable paper, and landscape waste, for diversion from landfills to meet the State's 50 percent solid waste diversion mandate. Solid waste generated within the City is collected by LA Sanitation and recycled, reused, or transformed at waste-to-energy facilities, or disposed of at landfills. Solid waste generated at larger multi-family residential buildings and commercial uses within the City, such as the proposed Project, are collected and transported by private waste collection services. The Puente Hills Materials Recovery Facility and Sunshine Canyon City & County Landfill are the nearest municipal waste landfills within the Los Angeles County that could serve the Project and are permitted to accept residential and commercial waste. The Puente Hills Materials Recovery Facility is currently permitted to receive up to 4,400 tons per day (tpd). Sunshine Canyon City & County Landfill is currently permitted to receive up to 11,000 tpd and actual daily disposal rates for the year 2020 averaged 8,039 tpd, leaving a surplus daily capacity of 2,961 tpd.⁷⁴ According to the Countywide Integrated Waste Management Plan 2020 Annual Report, the County would have adequate capacity through 2035 provided the County meets CalRecycle's Statewide Disposal Target of 2.7 pounds per person per day or meet the requirements of SB 1383 to reduce disposal of organic waste by 50 percent from 2014 levels by 2020 and by 75 percent by 2025.

Construction

Construction and demolition (C&D) activities would generate solid waste consisting of materials from existing structures to be demolished and excess/waste construction materials and packaging associated with the proposed structure. Pursuant to LAMC, Section 99.04.408.1, the Project would be required to divert at least 50 percent of C&D waste as a condition of permitting. Section 66.32 of the LAMC requires that C&D waste from the City be taken to a City certified C&D waste processor to ensure diversion of recyclables. All haulers and contractors who collect, haul, or transport C&D waste must have a Private Waste Hauler Permit from the Los Angeles Sanitation and Environment. Accordingly, the Project will be required to hire a C&D private waste hauler certified to properly divert recyclable waste. **Table V-18, Construction Solid Waste Generation**, shows the Project's estimated C&D to be disposed of at a landfill following diversion of recyclable materials.

⁷⁴ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report (October 2021), Appendix E-2, Table 4.

Table V-18
Construction Solid Waste Generation

| Type of Use | Size | Generation Rate ^a | Total Waste (pounds) | Total Waste (tons) |
|--|------------|------------------------------|----------------------|--------------------|
| Demolition | | | | |
| Commercial | 22,000 sf | -- | 2,146,300 | 1,073 ^d |
| Construction | | | | |
| Residential | 231,320 sf | 4.39 pounds/sf | 1,015,495 | 508 |
| Office | 15,500 sf | 4.34 pounds/sf | 67,270 | 34 |
| Commercial | 25,000 sf | 4.34 pounds/sf | 108,500 | 54 |
| Total Construction and Demolition Waste Generation | | | 3,337,265 | 1,669 |
| Diversion of 50 Percent for Recycling ^b | | | 1,668,632 | 834 |
| Total Construction and Demolition Waste for Landfill Disposal | | | 1,668,632 | 834 |

(^a) United States Environmental Protection Agency (US EPA), Office of Resource Conservation and Recovery, Report No. EPA530-R-09-002, Estimating 2003 Building-Related Construction and Demolition Materials Amount.
 (^b) Required by LAMC, Section 99.04.408.1
 (^c) sf = square feet
 (^d) Envicom Corporation, Air Quality and Greenhouse Gas Impact Analysis: The Parks in LA Project, August 2022.

As shown in Table XIX-3, after the required diversion of 50 percent of recyclable materials, the estimated C&D waste to be disposed of at landfills would be reduced to 834 tons. Additionally, the Project would require excavation and disposal of approximately 58,800 cy of soil for construction of subterranean parking which would be hauled to Azusa Land Reclamation Company Landfill. Exported soil is used as ground cover when deposited at landfills, and thus may be beneficial to landfill operations and are not considered further in this evaluation. Disposal of construction waste would occur over the duration of construction activities. However, if disposed of all in one day, the Project's total C&D waste disposal of 834 tons would represent approximately 12 percent of the excess daily disposal capacity at Azusa Land Reclamation Company Landfill, the closest landfill that accepts C&D waste, based on average daily disposal rates in 2020. As such, the Project's waste disposal during construction activities would not exceed the daily permitted capacity of the Azusa Land Reclamation Company Landfill. As such, solid waste disposal from construction activities would be less than significant.

Operations

During operations, the Project would generate solid waste from the residences, restaurants, and retail space. The Project's operational solid waste generation has been estimated as shown in **Table V-19, Operations Solid Waste Generation**, based on solid waste generation rates provided by California Department of Resources Recycling and Recovery (CalRecycle).⁷⁵

Table V-19
Operations Solid Waste Generation

| Type of Use | Size | Generation Rate ^(a) | Total Waste (pounds/day) | Total Waste (tons/day) |
|--|--------------------------|--------------------------------|--------------------------|------------------------|
| Residential | 251 Units | 4 pounds/unit | 1,004 | 0.502 |
| Office | 15,550 sf ^(b) | 0.006 pounds/sf | 93 | 0.047 |
| Commercial | 1,500 sf | 5 pounds/1000 sf | 125 | 0.063 |
| Total Solid Waste Generated | | | 1,222 | 0.611 |
| Diversion of 50 Percent for Recycling | | | 611 | 0.306 |
| Total Solid Waste Disposed at Landfills | | | 611 | 0.306 |

(^a) California Department of Resources Recycling and Recovery (CalRecycle).
 (^b) sf = square feet

⁷⁵ California Department of Resources Recycling and Recovery (CalRecycle), Commercial Sector Generation Rates, webpage accessed at <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates#Commercial> on June 19, 2020.

As shown in Table XIX-4, the estimated solid waste generation from the proposed residential, restaurant, and commercial retail uses during operations would be approximately 1,222 pounds per day or approximately 0.6 tons per day. Diversion of 50 percent of the solid waste stream for recycling would result in a total of 611 pounds per day (0.3 tons per day) to be disposed in landfills. As such, the Project's operational solid waste disposal would represent approximately 0.007 percent of the permitted daily capacity of the Puente Hills Materials Recovery Facility or approximately 0.01 percent of the surplus permitted daily capacity of Sunshine Canyon Landfill reported in 2020. Therefore, the Project's potential to have a substantial environmental effect regarding inadequate landfill capacity or attainment of solid waste reduction goals would be less than significant.

The Project would be required to comply with City requirements regarding the diversion of recyclables from the solid waste stream, as described in **Regulatory Compliance Measure RC-UTIL-1** below.

Regulatory Compliance Measure RC-UTIL-1: Utilities (Solid Waste Recycling)

- 1) (Operational) Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program.
- 2) (Construction/Demolition) Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the Project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety.

Mitigation Measures: No mitigation measures would be required.

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

Less Than Significant Impact. The proposed Project would generate solid waste that is typical of residential, office, and commercial uses and would comply with all federal, state, and local laws, statutes, and ordinances regarding the proper disposal of solid waste. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------------|--|------------------------------------|-------------------------------------|
| XX. WILDFIRE. | | | | |
| If located in or near state responsibility areas or land 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 factor, 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 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"/> |

Impact Analysis

a. If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. A project could have a substantial impact if the Project Site is located near state responsibility areas or land classified as a VHFHSZ and would substantially impact an adopted emergency response plan or emergency evacuation plan.

The Project is urban infill redevelopment located in a highly urbanized area that has been developed for several decades. The purpose of Section XX is to analyze “the wildfire risks of development projects in the wildland-urban interface and other fire prone areas.”⁷⁶ Wildfire prone areas are those areas classified by the California Department of Forestry and Fire Protection (CAL FIRE) as high or very high fire hazard severity zones (VHFHSZ). State Responsibility Areas (SRA) are high fire hazard zones where the State has responsibility for firefighting operations.⁷⁷ Section XX is present in order to require lead agencies to consider the wildfire impacts of projects within SRAs, FHSZs and VHFHSZs, and in areas of wildland-urban interface (WUI). Projects outside of these zones in an urban setting are not at risk of wildfire and the questions of Section XX are not applicable.

⁷⁶ California Office of the Attorney General, Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act, October 10, 2022.

⁷⁷ Ibid.

Wildfires are defined in Chapter 7A of the CBC, Section 702A as “any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources as defined in Public Resources Code Sections 4103 and 4104.” PRC Sections 4103 subsequently define “Forest Fire” and use of the term “uncontrolled fire” within Division 4 of the PRC. A fire in an urban setting, typically called a “structure fire,” is not a wildfire. An urban building surrounded by an urban landscape may be subject to the risk of a structure fire, but by definition cannot be subject to the risk of wildfire, unless located within an SRA, FHSZ, VHFHSZ, or WUI area.

The Project Site is not located within or near an existing or proposed SRA⁷⁸ or land classified as FHSZ or VHFHSZ,⁷⁹ and is not within a WUI area.⁸⁰ The nearest such area is approximately three miles to the northeast, a VHFHSZ that extends from Griffith Park southeast between Sunset Boulevard and Interstate 5, encompassing a hilly urban area and Dodger Stadium. There are no wilderness areas or otherwise heavily vegetated areas that may be subject to wildfire between the Project Site and this VHFHSZ area, but rather unbroken, fully developed urban spaces, all of which are within the service area of various LAFD stations. Furthermore, the Project Site is not within the ember zone (area in which embers from a vegetation fire may travel) of a VHFHSZ, which is generally considered a distance of one mile.⁸¹ As it is not within any of these areas at risk of wildfire it is not made subject to Chapter 7A of the California Building Code, which applies to all new buildings located in or near a FHSZ and requires particular building features meant to resist the intrusion of flames or burning embers projected by a vegetation fire. The Project is not subject to Chapter 7A because it is not subject to the threats of wildfire.

Therefore, the Project Site cannot reasonably be considered to be “located in or near state responsibility areas or land classified as very high fire hazard severity zones” nor within or near a WUI area, nor within the ember zone of a wildfire prone area, and thus Section XX is not applicable to the Project, and there would be no Project impacts in relation to wildfire.

Mitigation Measures: No mitigation measures are required.

b. If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factor, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As explained in XX.a above the project is not in or near an SRA, FHSZ, or VHFHSZ, nor any heavily vegetated area or WUI area, and the question is not applicable to the Project.

Mitigation Measures: No mitigation measures are required.

c. If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project require the installation 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?

⁷⁸ Board of Forestry and Fire Protection, State Responsibility Area Viewer, Accessed on Jul 11, 2022 at: <https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/>.

⁷⁹ CalFire, FRAP, FHSZ Viewer, Accessed on July 11, 2022 at: <https://egis.fire.ca.gov/FHSZ/>.

⁸⁰ CalFire, FRAP, Wildland Urban Interface (WUI) map, December 2019, available at: https://frap.fire.ca.gov/media/10300/wui_19_ada.pdf

⁸¹ Office of the State Fire Marshal, Fire Hazard Severity Zone informational page Accessed on August 1, 2022 at: <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/>

No Impact. As explained in XX.a above the project is not in or near an SRA, FHSZ, or VHFHSZ, nor any heavily vegetated area or WUI area, and the question is not applicable to the Project.

Mitigation Measures: No mitigation measures are required.

d. If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project 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 explained in XX.a above the project is not in or near an SRA, FHSZ, or VHFHSZ, nor any heavily vegetated area or WUI area, and the question is not applicable to the Project.

Mitigation Measures: No mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

| | Potentially Significant Impact | Potentially Significant Unless 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 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 an individual 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"/> |
| o Does the project have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

a. Less Than Significant Impact. For the purpose of this analysis, a significant impact could occur if a project would significantly degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

As discussed above in Section IV. Biological Resources, the Project Site is located within an urbanized area of the City, surrounded by urban uses, including a major arterial street and adjacent residential and commercial uses, and it would have unlikely potential to degrade the quality of the environment, based on the analyses above. The Project would be completely constructed within previously developed lots, which do not represent substantial habitat for fish or wildlife. The Project would not eliminate a plant or animal community or restrict the range of any plant or animal. As discussed in Section V. Cultural Resources, the Project development would not eliminate any known important examples of the major periods of California history or prehistory, and it would not eliminate any unknown important examples of California prehistory through required compliance with regulatory requirements. Impacts would be less than significant and no additional mitigation measures are required.

b. Less Than Significant Impact. For the purpose of this analysis, a significant impact could occur if a project, in conjunction with other projects in the vicinity, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. The Project would

be constructed within an urbanized area of the City, on the previously developed Site, and it would be consistent with General Plan land use designations and zoning for the Project Site with approval of the requested General Plan Amendment, Zone Change, and Height District Change. Additionally, as discussed in Section XIV, the Project would represent less than one percent (0.04 percent) of the projected 2016 to 2045 City employment increase. As such, the scale of the Project would be far below projected growth levels, and will be a positive contribution to the City's severe housing shortage, and it would not be anticipated to result in a cumulatively considerable contribution to regional impacts that could cause an adverse physical change in the environment. As concluded in this analysis, the Project's incremental contribution to each evaluated issue would be less than significant, mitigated to less than significant, or would have no impact. As such, the Project's contribution to cumulative impacts would be less than significant and no additional mitigation measures are required.

c. Less Than Significant Impact. A significant impact could occur if a project would have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly.

As discussed in the preceding environmental analysis, the Project would not have significant environmental effects with implementation of the mitigation measures identified within this document. As such, the Project would not have substantial adverse effects on human beings. Therefore, this potential impact would be less than significant and no additional mitigation measures are required.

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APPENDIX A

Air Quality and Greenhouse Gas Impact Analysis

AIR QUALITY AND GREENHOUSE GAS IMPACT ANALYSIS

The Parks in LA Project
City of Los Angeles
Project # 2022-034-01

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August 2022

Revised October, 2022

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1.0 INTRODUCTION

The purpose of this Air Quality and Greenhouse Gas Impact Analysis is to identify, describe, and evaluate the significance of potential air quality impacts resulting from the construction and operation of a proposed mixed-use project as an infill development in the City of Los Angeles.

2.0 PROPOSED DEVELOPMENT

The proposed project would be located at 3433 West 8th Street, as shown in **Figure 1, Vicinity Map**, in the Wilshire Community Plan Area of the City of Los Angeles. The proposed project would redevelop an approximately 1.45-acre infill site by constructing an 8-story mixed-use structure providing a total of 251 residential apartment units, including 18 live/work units, with 18,000 square-feet of commercial space, and a total of 22,500 square feet of office space. The proposed project would incorporate two subterranean parking levels, which together with ground level parking spaces would provide a total of 283 spaces for vehicle parking onsite. A total of 165 long-term bicycle parking spaces and 39 short-term bicycle parking spaces would be provided on the ground floor of the project. The project site is located within a Transit Oriented Community (Tier 3)¹ pursuant to Los Angeles Municipal Code 12.22 A.31, TOC) Affordable Housing Incentive Program. Public transit facilities in the project site vicinity include two subway stations within approximately 0.4 miles walking distance, and several bus stops serviced by a variety of local and regional carriers. The nearest bus stop is located within approximately 65 feet of the project site.

Construction of the project would require demolition of approximately 22,000 square feet of existing buildings, as well as removal of surface parking lots. Approximately 1,073 tons of debris would be removed for site preparation. Grading and excavation for the subterranean parking levels would require export of approximately 58,300 cubic yards of soil, which would be hauled to Azusa Land Reclamation, located at 1211 West Gladstone in Azusa, CA, approximately 27 miles east of the project site.

3.0 AIR QUALITY SETTING

The City of Los Angeles is located within the South Coast Air Basin (air basin). The air basin is bounded by the Pacific Ocean to the west, the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and San Diego County to the south.

In addition to being a metropolitan area with a high level of human activity, the topography and climate of Southern California combine to produce unhealthful air quality in the air basin. Low temperature inversions, light winds, shallow vertical mixing, and extensive sunlight, in combination with topographical features such as adjacent mountain ranges that hinder dispersion of air pollutants, can result in degraded air quality within the air basin.

Ambient Air Quality Standards

National and State ambient air quality standards (AAQS),² shown in **Table 1, Ambient Air Quality Standards**, are the air quality levels that are considered safe, with an adequate margin of safety, to protect

¹ City of Los Angeles, Department of City Planning, Zoning Information and Map Access System (ZIMAS), Available at <http://zimas.lacity.org/>, Accessed on July 16, 2022.

² California Air Resources Board. California and National Ambient Air Quality Standards. Available at: https://www.arb.ca.gov/research/aaqs/aaqs2.pdf?_ga=2.111850244.1417595818.1550763932-1724706578.1550763932. Accessed on February 21, 2019.

Table 1
Ambient Air Quality Standards

| Ambient Air Quality Standards | | | | | | |
|---|-------------------------|------------------------------------|--|---|-----------------------------------|---|
| Pollutant | Averaging Time | California Standards ¹ | | National Standards ² | | |
| | | Concentration ³ | Method ⁴ | Primary ^{3,5} | Secondary ^{3,6} | Method ⁷ |
| Ozone (O ₃) ⁸ | 1 Hour | 0.09 ppm (180 µg/m ³) | Ultraviolet Photometry | — | Same as Primary Standard | Ultraviolet Photometry |
| | 8 Hour | 0.070 ppm (137 µg/m ³) | | 0.070 ppm (137 µg/m ³) | | |
| Respirable Particulate Matter (PM10) ⁹ | 24 Hour | 50 µg/m ³ | Gravimetric or Beta Attenuation | 150 µg/m ³ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 20 µg/m ³ | | — | | |
| Fine Particulate Matter (PM2.5) ⁹ | 24 Hour | — | — | 35 µg/m ³ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 12 µg/m ³ | Gravimetric or Beta Attenuation | 12.0 µg/m ³ | 15 µg/m ³ | |
| Carbon Monoxide (CO) | 1 Hour | 20 ppm (23 mg/m ³) | Non-Dispersive Infrared Photometry (NDIR) | 35 ppm (40 mg/m ³) | — | Non-Dispersive Infrared Photometry (NDIR) |
| | 8 Hour | 9.0 ppm (10 mg/m ³) | | 9 ppm (10 mg/m ³) | — | |
| | 8 Hour (Lake Tahoe) | 6 ppm (7 mg/m ³) | | — | — | |
| Nitrogen Dioxide (NO ₂) ¹⁰ | 1 Hour | 0.18 ppm (339 µg/m ³) | Gas Phase Chemiluminescence | 100 ppb (188 µg/m ³) | — | Gas Phase Chemiluminescence |
| | Annual Arithmetic Mean | 0.030 ppm (57 µg/m ³) | | 0.053 ppm (100 µg/m ³) | Same as Primary Standard | |
| Sulfur Dioxide (SO ₂) ¹¹ | 1 Hour | 0.25 ppm (655 µg/m ³) | Ultraviolet Fluorescence | 75 ppb (196 µg/m ³) | — | Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method) |
| | 3 Hour | — | | — | 0.5 ppm (1300 µg/m ³) | |
| | 24 Hour | 0.04 ppm (105 µg/m ³) | | 0.14 ppm (for certain areas) ¹¹ | — | |
| | Annual Arithmetic Mean | — | | 0.030 ppm (for certain areas) ¹¹ | — | |
| Lead ^{12,13} | 30 Day Average | 1.5 µg/m ³ | Atomic Absorption | — | — | High Volume Sampler and Atomic Absorption |
| | Calendar Quarter | — | | 1.5 µg/m ³ (for certain areas) ¹² | Same as Primary Standard | |
| | Rolling 3-Month Average | — | | 0.15 µg/m ³ | | |
| Visibility Reducing Particles ¹⁴ | 8 Hour | See footnote 14 | Beta Attenuation and Transmittance through Filter Tape | No National Standards | | |
| Sulfates | 24 Hour | 25 µg/m ³ | Ion Chromatography | | | |
| Hydrogen Sulfide | 1 Hour | 0.03 ppm (42 µg/m ³) | Ultraviolet Fluorescence | | | |
| Vinyl Chloride ¹² | 24 Hour | 0.01 ppm (26 µg/m ³) | Gas Chromatography | | | |

See footnotes on next page

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1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
 2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above $150 \mu\text{g}/\text{m}^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
 3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
 4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
 5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
 6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
 7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
 8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
 9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from $15 \mu\text{g}/\text{m}^3$ to $12.0 \mu\text{g}/\text{m}^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at $35 \mu\text{g}/\text{m}^3$, as was the annual secondary standard of $15 \mu\text{g}/\text{m}^3$. The existing 24-hour PM10 standards (primary and secondary) of $150 \mu\text{g}/\text{m}^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
 10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
 11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
 12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
 13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard ($1.5 \mu\text{g}/\text{m}^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
 14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

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the public health and welfare of "sensitive receptors," which include the elderly, young children, the acutely and chronically ill (e.g., those with cardio-respiratory disease, including asthma), and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed. Recent research has shown, however, that chronic exposure to ozone (O₃), the primary ingredient in photochemical smog, may lead to adverse respiratory health, even at concentrations close to the ambient standard. Sources and health effects of various pollutants are shown in **Table 2, Health Effects of Major Criteria Pollutants**.

Table 2
Health Effects of Major Criteria Pollutants

| Pollutants | Health Effects |
|---|---|
| Particulate Matter - PM-2.5 (less than 2.5 microns in diameter) | <ul style="list-style-type: none"> Premature death Hospitalization for worsening of cardiovascular disease Hospitalization for respiratory disease Asthma-related emergency room visits Increased symptoms, increased inhaler usage |
| Particulate Matter - PM-10 (less than 10 microns in diameter) | <ul style="list-style-type: none"> Premature death & hospitalization, primarily for worsening of respiratory disease Reduced visibility and material soiling |
| Ozone (O₃) | <ul style="list-style-type: none"> Respiratory symptoms Worsening of lung disease leading to premature death Damage to lung tissue Crop, forest, and ecosystem damage Damage to a variety of materials, including rubber, plastics, fabrics, paint, and metals |
| Carbon Monoxide (CO) | <ul style="list-style-type: none"> Chest pain in patients with heart disease Headache Light-headedness Reduced mental alertness |
| Nitrogen Dioxide (NO₂) | <ul style="list-style-type: none"> Lung irritation Enhanced allergic responses |
| Source: California Air Resources Board, Common Air Pollutants, accessed March 3, 2022, at https://www.arb.ca.gov/research/health/fs/fs1/fs1.htm . | |

Baseline Air Quality

Existing levels of ambient air quality and historical trends and projections in the project area are documented from measurements made by the South Coast Air Quality Management District (SCAQMD), which is the agency that is responsible for regulating stationary sources of emissions in the air basin. SCAQMD's central Los Angeles (downtown) air monitoring station (Station 087) is the nearest air monitoring station to the project site; therefore, monitoring data recorded at that station for regional air pollutants, such as O₃, carbon monoxide (CO), nitrogen oxides (NO_x), and 10-micron diameter or less particulate matter (PM-10 and PM-2.5) are most representative of the air quality in the project area. **Table 3, Project Area Air Quality Monitoring Summary 2016-2020**, provides data from this monitoring station for the previous five years (2016-2020) for which this data is available from the SCAQMD website.³ The air quality data and trends in the project vicinity, as documented in Table 3, are summarized below:

³ South Coast Air Quality Management District, Historical Data By Year, Available at <http://yourstory.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year>. Accessed February 21, 2022.

1. From 2016-2020, O₃ levels exceeded the 1-hour State standard 24 days, the 8-hour State standard 46 days, and the Federal 8-hour standard 27 days.
2. PM-10 levels exceeded the State 24-hour standard 9.0 percent of all days monitored from 2016-2020. The National 24-hour PM-10 standard was not exceeded in the same period.
3. PM-2.5 levels exceeded the current National 24-hour standard approximately 1.0 percent of all days monitored from 2016-2020.
4. CO and NO_x levels have not exceeded National or State standards in the previous five years of monitoring data (2016-2020).

Table 3
Project Area Air Quality Monitoring Summary 2016-2020

| Pollutant/Standard | 2016 | 2017 | 2018 | 2019 | 2020 |
|---|--------|--------|--------|-------|--------|
| Ozone | | | | | |
| <i>Number of Days Standards Exceeded</i> | | | | | |
| 1-Hour > 0.09 ppm (S) | 2 | 6 | 2 | 0 | 14 |
| 8-Hour > 0.07 ppm (S) | 4 | 14 | 4 | 2 | 22 |
| 8-Hour > 0.075 ppm (F) | 1 | 9 | 0 | 1 | 16 |
| <i>Maximum Observed Concentration</i> | | | | | |
| Max. 1-Hour Conc. (ppm) | 0.103 | 0.116 | 0.098 | 0.085 | 0.185 |
| Max. 8-Hour Conc. (ppm) | 0.078 | 0.086 | 0.073 | 0.080 | 0.118 |
| Carbon Monoxide | | | | | |
| <i>Number of Days Standards Exceeded</i> | | | | | |
| 8-Hour > 9.0 ppm (S, F) | 0 | 0 | 0 | 0 | 0 |
| <i>Maximum Observed Concentration</i> | | | | | |
| Max 8-Hour Conc. (ppm) | 1.4 | 1.9 | 1.7 | 1.6 | 1.5 |
| Nitrogen Dioxide | | | | | |
| <i>Number of Days Standards Exceeded</i> | | | | | |
| 1-Hour > 0.18 ppm (S) | 0 | 0 | 0 | 0 | 0 |
| <i>Maximum Observed Concentration</i> | | | | | |
| Max. 1-Hour Conc. (ppm) | 0.065 | 0.081 | 0.070 | 0.070 | 0.062 |
| Inhalable Particulates (PM-10) | | | | | |
| <i>Number of Days Standards Exceeded/Days Monitored</i> | | | | | |
| 24-Hour > 50 µg/m ³ (S) | 18/277 | 41/340 | 31/363 | 3/9 | 24/337 |
| 24-Hour > 150 µg/m ³ (F) | 0/277 | 0/340 | 0/363 | 0/9 | 0/337 |
| <i>Maximum Observed Concentration</i> | | | | | |
| Max. 24-Hr. Conc. (µg/m ³) | 67 | 96 | 81 | 62 | 77 |
| Ultra-Fine Particulates (PM-2.5) | | | | | |
| <i>Number of Days Standards Exceeded/Days Monitored</i> | | | | | |
| 24-Hour > 35 µg/m ³ (F) | 2/357 | 3/358 | 3/344 | 1/360 | 2/353 |
| <i>Maximum Observed Concentration</i> | | | | | |
| Max. 24-Hr. Conc. (µg/m ³) | 44.4 | 49.2 | 43.8 | 43.5 | 47.3 |
| Source: SCAQMD, Historical Data by Year, Air Quality Data Tables downloaded from: https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year . | | | | | |

Air Quality Planning

In the air basin, the agencies designated to develop the regional Air Quality Management Plan (AQMP) are the SCAQMD and the Southern California Association of Governments (SCAG). The 2016 Air Quality Management Plan (AQMP) is a regional blueprint for achieving air quality standards and healthful air, and

it represents a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures. According to the AQMP, the principal contributor to air quality challenges in the air basin is mobile source emissions.

Primary Pollutants

Primary pollutants are those that are emitted in their already unhealthful form. CO is an example of such a pollutant, which can have effects at a very localized level, near an individual source of emissions or a collection of sources, such as a crowded intersection or parking lot. Many particulates, especially fugitive dust emissions, are also primary pollutants. Because of the non-attainment status of the SCAB for PM-10, SCAQMD Rule 403 requires construction projects to implement an aggressive dust control program.

Secondary Pollutants

Secondary pollutants are those that transform over time from more benign components directly emitted from a source(s) to a more unhealthful contaminant. O₃ is an example of a secondary pollutant, which is created through chemical reactions involving primary precursors (reactive organic gases, or ROG, and NO_x) and sunlight.

Emissions Forecasts

The most current regional emissions forecast for O₃ precursors (ROG and NO_x) and for CO and PM are shown in **Table 4, South Coast Air Basin Emissions Forecasts**. Substantial reductions in emissions of ROG, NO_x and CO are forecast to continue throughout the next several decades. Emissions of PM-10 and PM-2.5 are forecast to slightly increase unless new particulate control programs are implemented.

Table 4
South Coast Air Basin Emissions Forecasts (Emissions in tons/day)

| Pollutant | 2025 | 2030 | 2035 |
|--|------|------|------|
| Nitrogen Oxide (NO _x) | 289 | 266 | 257 |
| Volatile Organic Compounds (VOCs)* | 393 | 393 | 391 |
| PM-10 | 165 | 170 | 172 |
| PM-2.5 | 68 | 70 | 71 |
| Source: California Air Resources Board, Almanac 2013, Chapter 4: Regional Trends and Forecasts, Table 4-1 | | | |
| * For purposes of this analysis, VOC and ROG (Reactive Organic Gas) are used interchangeably since ROG represents approximately 99.9 percent of VOC. | | | |

4.0 AIR QUALITY IMPACTS

Significance Criteria

State CEQA Guidelines

Air quality impacts of a project are considered significant if they cause clean air standards to be violated where they are currently met, or if they substantially contribute to an existing violation of standards. Substantial emissions of air contaminants for which there is no safe exposure, or nuisance emissions such as dust or odors, that are generated by a project, would also be considered significant impacts.

As set forth in Appendix G, Environmental Checklist, of the State CEQA Guidelines, a project could have a potentially significant impact if it would:

- a. Conflict with or obstruct implementation of the applicable air quality plan.
- b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- c. Expose sensitive receptors to substantial pollutant concentrations.
- d. Result in other emissions such as those leading to odors adversely affecting a substantial number of people.

SCAQMD Emissions Thresholds

While conformity with adopted plans, forecasts and programs relative to population, housing, employment and land use designations could indicate conformance with the current AQMP, the air quality impact significance for the proposed project has been analyzed on a project-specific basis to determine consistency with SCAQMD project impact evaluation thresholds. As the amount of a secondary pollutant that may result from a project cannot be quantified by direct measurement of its emissions from a source, the SCAQMD has designated significant emissions levels of precursor components as surrogates for evaluating whether a project's emissions could result in significant regional air quality impacts associated with secondary pollutants. Projects with daily emissions that exceed any of the following emission thresholds shown in **Table 5, SCAQMD CEQA Daily Emissions Thresholds**, are recommended by the SCAQMD to be considered significant under CEQA.

Table 5
SCAQMD CEQA Daily Emissions Thresholds

| Pollutant | Construction | Operations |
|---|---------------------|-------------------|
| ROG | 75 | 55 |
| NO _x | 100 | 55 |
| CO | 550 | 550 |
| PM-10 | 150 | 150 |
| PM-2.5 | 55 | 55 |
| SO _x | 150 | 150 |
| Source: SCAQMD CEQA Air Quality Significance Thresholds, Revision April 2019. | | |

Existing Land Use Emissions

The project site is currently occupied by commercial uses, parking lots, and a single-family structure that would be removed by the project. These existing commercial and residential uses have been considered in determining the project's net increase in regional emissions as evaluated below.

Sensitive Receptors

Air quality impacts are analyzed relative to those persons with the greatest sensitivity to air pollution exposure. Such persons are called "sensitive receptors." Sensitive receptors include the elderly, young children, the acutely and chronically ill (e.g., those with cardio-respiratory disease, including asthma), and persons engaged in strenuous work or exercise. For this project, nearby residences are considered to be sensitive uses, because they may be occupied for extended periods, and residents may be outdoors when exposure is highest.

Construction Emissions Impacts

Criteria Pollutants

Dust is typically the primary concern during the construction of projects that would involve land clearing and grading. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Emission rates vary as a function of many parameters (including soil silt, soil moisture, wind speed, area disturbed, number of vehicles, and depth of disturbance or excavation).

The California Emissions Estimator Model (CalEEMod) is a Statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as from energy use, solid waste disposal, vegetation planting and/or removal, and water use. The model was developed for the California Air Pollution Officers Association (CAPCOA) in collaboration with the California Air Districts.

The proposed project's estimated construction emissions were modeled using CalEEMod Version 2020.4.0 to identify maximum daily emissions for each pollutant during project construction. The output reports from CalEEMod are included as **Appendix A** to this report. Construction emissions were modeled based on the size of the project site, the volume of demolition material and soil to be disposed of offsite, as well as the proposed building's square footage, number of units, and parking spaces. A conceptual construction equipment fleet list and approximate duration of each construction phase is shown in **Table 6, Conceptual Construction Equipment Fleet**. The project's maximum daily construction emissions as calculated by CalEEMod are listed in **Table 7, Maximum Daily Construction Emissions**.

All grading for construction projects in the City of Los Angeles must comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Best Available Control Measures (BACM) for all fugitive dust sources. SCAQMD Rule 403, Control Measure 08-2 states that during earth moving activities, projects are required to "Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction." Therefore, pursuant to SCAQMD Rule 403, the project would be required to implement adequate watering of exposed surfaces during grading.

As seen in Table 7, peak daily construction activity emissions of criteria air pollutants are estimated to be below the SCAQMD thresholds of significance. Therefore, construction period air quality impacts of the project would be less than significant.

Table 6
Conceptual Construction Equipment Fleet

| Phase Name and Duration | Equipment |
|--------------------------------|---------------------------|
| Demolition (20 days) | 1 Concrete/Industrial Saw |
| | 1 Rubber-tired Dozer |
| | 1 Excavator |
| | 3 Loader/Backhoes |
| Site Preparation (7 days) | 1 Grader |
| | 1 Loader/Backhoe |
| | 1 Rubber-tired Dozer |

| Phase Name and Duration | Equipment |
|---------------------------------|-----------------------|
| Grading (36 days) | 1 Grader |
| | 1 Excavator |
| | 1 Rubber tired dozer |
| | 2 Loader/Backhoe |
| Construction (400 days) | 1 Crane |
| | 1 Generator Set |
| | 1 Forklift |
| | 3 Welders |
| | 1 Loader/Backhoe |
| Paving (10 days) | 1 Cement/mortar Mixer |
| | 1 Paver |
| | 1 Roller |
| | 1 Loader/Backhoe |
| Architectural Coating (30 days) | 1 Air Compressor |
| Source: CORBeL Architects | |

Table 7
Maximum Daily Construction Emissions (pounds/day)

| | ROG | NO _x | CO | SO ₂ | PM-10 | PM-2.5 |
|--|------|-----------------|------|-----------------|-------|--------|
| Maximum Daily Construction Emissions | 63.4 | 48.8 | 22.6 | 0.2 | 11.7 | 5.4 |
| SCAQMD Thresholds | 75 | 100 | 550 | 150 | 150 | 55 |
| Significant Impact? Yes/No | No | No | No | No | No | No |
| Source: CalEEMod Version 2020.4.0 output, August 3, 2022. PM-10 and PM-2.5 emission estimates include watering exposed surfaces twice daily for dust suppression to comply with SCAQMD Rule 403 requirements. | | | | | | |

Localized Significance Thresholds Analysis

The SCAQMD has developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs were developed in response to the SCAQMD Governing Board's Environmental Justice Enhancement Initiative 1-4, and the LST methodology was provisionally adopted in October 2003 and formally approved by SCAQMD's Mobile Source Committee in February 2005. LSTs are only applicable to the following criteria pollutants: NO_x, CO, PM-10, and PM-2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable Federal or State ambient air quality standard, and they are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

Use of an LST analysis for a project is optional. For the proposed project, the primary source of possible LST impact would be construction activity, based on the maximum onsite daily emissions estimated by CalEEMod. LSTs are applicable for a sensitive receptor where it is possible that an individual could remain for 24 hours, such as a residence, hospital, or convalescent facility.

SCAQMD's LST screening tables provide thresholds for 25, 50, 100, 200 and 500-meter source-receptor distances. Due to existing residences located within 25 meters of the project boundary, the 25-meter thresholds were considered for this project. LST pollutant screening level concentration data is currently published for 1, 2 and 5-acre sites. For this project, thresholds for a 1-acre site were used. This evaluation

is based on estimated onsite daily construction emissions for the phase and year representing the highest daily emissions. Daily averages would be lower than the reported maximum amounts.

Table 8, Local Significance Thresholds (LST) and Peak Daily Onsite Construction Emissions (pounds/day) shows the relevant thresholds and the estimated peak daily onsite emissions during the construction phases that would generate the highest level of onsite emissions for each pollutant evaluated for LST impacts.⁴ As previously described, the project would be required to implement adequate watering of exposed surfaces during grading to reduce dust emissions to comply with SCAQMD Rule 403, Fugitive Dust. As seen in Table 8, the peak onsite emissions during construction would not exceed the applicable SCAQMD LSTs, and as such, potential LST impacts would be less than significant.

Table 8
Local Significance Thresholds
and Peak Daily Onsite Construction Emissions (pounds/day)

| LST 1.0 acre/25 meters Central LA | NO_x | CO | PM-10 | PM-2.5 |
|--|-----------------------|-----------|--------------|---------------|
| Peak Onsite Daily Emissions | 16.0 | 16.7 | 3.5 | 2.1 |
| LST Threshold | 74 | 680 | 5 | 3 |
| Significant Impact? Yes/No | No | No | No | No |
| Source: CalEEMod Version 2020.4.0 output, August 3, 2022. PM-10 and PM-2.5 emission estimates include watering exposed surfaces twice daily for dust suppression to comply with SCAQMD Rule 403 requirements. | | | | |

Asbestos and Lead Based Paint

Due to the date of construction of the existing building, it is possible that demolition workers may encounter asbestos containing materials (ACM) and/or lead based paint (LBP). Regulatory requirements for the appropriate testing and appropriate abatement and disposal of ACM or LBP material if present are provided in SCAQMD Rule 1403 and the California Occupational Safety and Health Administration's (Cal/OSHA's) regulations (including, but not limited to, the California Occupational Safety and Health Act and Title 8 of the California Code of Regulations, respectively).

Operational Emissions Impacts

Criteria Pollutants

During operations, the proposed land uses would result in air quality emissions of criteria pollutants from area sources, energy sources, and mobile sources. The SCAQMD thresholds for air quality impacts from operations are shown above in Table 5. As an infill development, the proposed project's operational emissions would be at least somewhat offset by the removal of the existing land use on the project site. Therefore, CalEEMod was used to estimate emissions from the existing uses as well as the proposed uses, to determine the project's net change in regional emissions. The CalEEMod output sheets for the proposed project, as well as the existing conditions are provided in Appendix A. The project's net increase in emissions due to operations of the proposed development would not exceed SCAQMD significance thresholds for criteria pollutants as shown in **Table 9, Maximum Daily Operations Emissions (pounds/day)**. As seen in Table 9, the project's total operational emissions would also be far below SCAQMD thresholds even without credit removal of existing uses on the project site. Therefore, operational impacts of the project would be less than significant.

⁴ Offsite construction emissions, such as export hauling, are not evaluated for local significance at receptors adjacent to the site.

Table 9
Maximum Daily Operations Emissions (pounds/day)

| Emissions Sources | ROG | NO_x | CO | SO₂ | PM-10 | PM-2.5 |
|---|--------------|-----------------------|--------------|-----------------------|--------------|---------------|
| Proposed Uses | | | | | | |
| Area | 6.57 | 0.24 | 20.72 | <0.01 | 0.11 | 0.11 |
| Energy | 0.07 | 0.64 | 0.30 | <0.01 | 0.05 | 0.05 |
| Mobile | 4.44 | 4.67 | 43.77 | 0.10 | 10.61 | 2.90 |
| Total | 11.08 | 5.55 | 64.80 | 0.10 | 10.78 | 3.04 |
| Existing Uses | | | | | | |
| Area | 0.53 | <0.01 | 0.08 | 0.00 | <0.01 | <0.01 |
| Energy | <0.01 | 0.02 | 0.01 | <0.01 | <0.01 | <0.01 |
| Mobile | 0.98 | 1.07 | 8.83 | 0.02 | 1.76 | 0.48 |
| Total | 1.52 | 1.09 | 8.92 | 0.02 | 1.77 | 0.48 |
| Net Increase | 9.56 | 4.46 | 55.88 | 0.08 | 9.01 | 2.56 |
| SCAQMD Thresholds | 55 | 55 | 550 | 150 | 150 | 55 |
| Significant Impact? Y/N | No | No | No | No | No | No |
| Source: Proposed- CalEEMod Version 2020.4.0 output, August 3, 2022; Existing- CalEEMod Version 2020.4.0 output, March 2, 2022. Totals may not add due to rounding. | | | | | | |

Toxic Air Contaminants

Exhaust particulates emitted from diesel powered equipment contains carcinogenic compounds, or toxic air contaminants (TACs). As residential projects do not generate a substantial quantity of diesel truck trips during operations, any measurable diesel TAC emissions from the project would occur for only a brief period during construction activities that would require onsite use of heavy-duty equipment. The toxicity of diesel exhaust is evaluated relative to a 24-hour per day, 365 days per year, 70-year lifetime exposure. The SCAQMD does not generally require the analysis of construction-related diesel emissions relative to health risk due to the short period for which the majority of diesel exhaust would occur. Health risk analyses are typically assessed over a 9-, 30-, or 70-year timeframe rather than a relatively brief construction period, due to the lack of health risk associated with such a brief exposure. As such, potential impacts of the project due to emissions of TACs would be less than significant.

Odor Impacts

As stated above, a significant impact may occur if a project would create objectionable odors affecting a substantial number of people. However, objectionable odors are typically associated with manufacturing, industrial, or sewage treatment processes, while the project involves a residential development. Nevertheless, the SCAQMD's rules for odor compliance are mandated under the California Health and Safety Code, Section 41700, and they are also addressed in SCAQMD Rule 402. This rule on Public Nuisance states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals." During construction and operations, the project would be subject to this regulation. Therefore, odor impacts of the project during construction and operation would be less than significant.

5.0 GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions and Global Climate Change

Greenhouse Gases (GHGs) emitted by human activity are implicated in global climate change. These GHGs contribute to an increase in the temperature of the earth's atmosphere by preventing long wavelength heat radiation in some parts of the infrared spectrum from leaving the atmosphere. According to California's 2017 Climate Change Scoping Plan,⁵ in California, as in the rest of the world, climate change is contributing to an escalation of serious problems, including raging wildfires, coastal erosion, disruption of water supply, threats to agriculture, spread of insect-borne diseases, and continuing health threats from air pollution. For purposes of planning and regulation, Section 15364.5 of the California Code of Regulations defines GHGs as including CO₂, CO, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. CO₂ is the primary GHG emitted in California, accounting for 84 percent of total GHG emissions in 2015.⁶ Because the warming potential of the identified GHGs differ, GHG emissions are typically expressed in terms of CO₂ equivalents (CO₂e), providing a common expression for the combined volume and warming potential of the GHGs generated by a particular emitter. The total GHG emissions from individual sources are generally reported in metric tons (MT) and are expressed as MT of CO₂ (MTCO₂e).

Fossil fuel combustion in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. The transportation sector, primarily on-road travel, is the single largest source of CO₂ emissions in California. Additionally, about 50 percent of the industrial source emissions of CO₂ are from the refinery and oil and gas sectors. When the industrial source emissions from the oil and gas sectors are attributed to the transportation sector, the emissions associated with transportation amount to approximately half of Statewide GHG emissions.⁷

The Global Warming Solutions Act of 2006 (Assembly Bill, or AB, 32) required that the California Air Resources Board (ARB) determine the Statewide 1990 GHG emission level and approve a Statewide GHG emissions limit, equal to the 1990 level, to be achieved by 2020. As reported in the 2017 Climate Change Scoping Plan, California is on track to exceed its 2020 GHG reduction target. Executive Order B-30-15 and Senate Bill (SB) 32 extended the goals of AB 32 and set a 2030 goal of reducing emissions by 40 percent from 2020 levels.

Significance Criteria

Based on the CEQA Guidelines, Appendix G, a project would have a potentially significant GHG impact if it would:

- Generate GHG emissions, directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy or regulation adopted to reduce GHG emissions.

According to Section 15064.4 of the CEQA Guidelines, in determining the significance of GHG emissions the "lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project." However, CEQA Guidelines Section 15064.4 does not establish a threshold of significance, but states that a lead agency shall

⁵ California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017.

⁶ Ibid.

⁷ Ibid.

have discretion to determine, in the context of a particular project, whether to (1) quantify GHG emissions resulting from a project and/or (2) rely on a qualitative analysis or performance-based standards. The CEQA Guidelines also clarify that a project's incremental contribution of GHG emissions may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions (see CEQA Guidelines Section 15064.4(b)).

According to CEQA Guidelines Section 15064.4(b), Lead agencies should consider the following factors when determining the significance of impacts from GHG emissions on the environment:

- (1) The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Pursuant to Section 15064.4 of the CEQA Guidelines, the project's GHG emissions were estimated using CalEEMod.2016.3.2 emissions estimation model, which was developed for CAPCOA in collaboration with the California Air Districts. The CalEEMod output is provided in Appendix A. However, no numeric threshold of significance for the analysis of GHG impacts that would apply to the project has been adopted by the City, the SCAQMD, or the State for determining significance pursuant to CEQA Guidelines Section 15064.4(b)(2).

On December 5, 2008, the SCAQMD Governing Board adopted a staff proposal for an interim quantitative GHG significance threshold for industrial projects where the SCAQMD is the lead agency (e.g., stationary source permit projects, rules, plans, etc.) of 10,000 MTCO₂e/year. The SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, dated October 2008 also included a recommendation for establishing an interim GHG significance threshold of 3,000 MTCO₂e/year for residential and commercial projects in addition to the 10,000 MTCO₂e/year threshold for industrial facilities. The policy objective of SCAQMD's staff recommended interim GHG significance threshold proposal was to achieve an emission capture rate of 90 percent of all new or modified stationary source projects to address the long-term adverse impacts associated with global climate change. A 90 percent emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to some type of CEQA analysis.

In September 2010, regarding numerical GHG significance thresholds for residential and commercial uses, the SCAQMD staff presented the GHG CEQA Significance Threshold Stakeholder Working Group #15 with recommendations for numerical screening levels for lead agencies to determine the significance of GHG emissions of non-industrial projects, which included a screening threshold of 3,000 MTCO₂e/year for residential, commercial, and mixed-use projects. As stated above, no quantitative screening level for GHG emissions was adopted by SCAQMD that would apply to the project.

However, given the lack of a formally adopted numerical significance threshold applicable to this project, SCAQMD's proposed screening level of 3,000 MTCO₂e is provided and discussed for informational purposes in conjunction with the project's quantified GHG emissions. The determination of significance is thus to be made based on CEQA Guidelines Section 15064.4(b)(3) guidance regarding compliance with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Construction Activity Greenhouse Gas Emissions

As shown in the CalEEMod Version 2020.4.0 output for the proposed project in Appendix A, during project construction, the CalEEMod computer model estimates that the construction activities would generate a total of 1,379 MTCO₂e emissions, which would not exceed the recommended threshold of 3,000 MTCO₂e. The SCAQMD's GHG emissions evaluation guidance is to amortize construction emissions over a 30-year lifetime, which results in a project amortized annual emissions of approximately 46 MTCO₂e emissions. The amortized construction emissions have been added to the project's annual operational emissions, evaluated below.

Operational Greenhouse Gas Emissions

Based on the CalEEMod Version 2020.4.0 output files provided in Appendix A of this report, the project's annual operational GHG emissions from a combination of area sources, energy use, mobile, water use, and waste disposal would be 2,650.1 MTCO₂e, as shown in **Table 10, Annual Greenhouse Gas Emissions**. With the addition of the amortized construction GHG emissions discussed above, the project would result in annual emissions of approximately 2,696.1 MTCO₂e.

The contribution to GHG emissions by the existing commercial and residential uses on the property to be removed by the project was calculated using CalEEMod to determine the proposed project's net increase in total GHG emissions. The CalEEMod output for the existing use is included in Appendix A as the 8th and Hobart Existing Use. The estimated annual GHG emissions from the existing uses are approximately 418.9 MTCO₂e, which would be eliminated by development of the proposed project. Therefore, the proposed project's net increase in annual GHG emissions over the previous use would be 2,277.2 MTCO₂e, which would be below the 3,000 MTCO₂e threshold recommended by SCAQMD in 2010.

Table 10
Annual Greenhouse Gas Emissions

| Generation Source | MTCO ₂ e/year |
|---|--------------------------|
| Project Emissions | |
| Area Sources | 4.3 |
| Energy Utilization | 828.8 |
| Mobile Source | 1,573.0 |
| Solid Waste Generation | 78.1 |
| Water Consumption | 165.9 |
| Construction (Amortized) | 46.0 |
| Total Project Operational Emissions ^a | 2,696.1 |
| Existing Use | |
| All Sources | 418.9 |
| Net Increase | 2,277.2 |
| Guideline Threshold | 3,000.0 |
| Exceeds Threshold? | No |
| Source: Proposed- CalEEMod Version 2020.4.0 output, August 3, 2022; Existing- CalEEMod Version 2020.4.0 output, March 2, 2022 | |

Plan Consistency

The following section describes the extent the project complies with or exceeds the performance-based standards included in the regulations outlined in the City's Green Building Code, the Mobility Plan of the City's General Plan, the Green LA Climate Action Plan (the City's adopted Climate Action Plan, or CAP), the ClimateLA implementation program associated with the Green LA framework, and the Sustainable City

pLAn 2019 (also referred to as the City's Green New Deal). As demonstrated in the following analysis, the project would be consistent with the applicable GHG reduction plans and policies.

City of Los Angeles Green Building Code

The Los Angeles Green Building Code (LAGBC), found in Section IX, Article 9 of the Los Angeles Municipal Code (LAMC), is based on the California Green Building Standards Code that was developed and mandated by the State to attain consistency among the various jurisdictions within the State, reduce the building's energy and water use, reduce waste, and reduce the carbon footprint. The LAGBC was adopted pursuant to the Los Angeles Green Building Ordinance No. 181,480, to assist in regulating and reducing GHG emissions. The project would comply with the LAGBC by incorporating water and electricity use efficiency features, and it would meet construction waste diversion requirements. Through regulatory compliance, the project would be consistent with the provisions of the LAGBC.

City of Los Angeles General Plan Air Quality Element

The Air Quality Element of the City General Plan, adopted in 1992, contains broad policy goals that reflect an acknowledgement of the interrelationship between transportation and land use planning as they relate to air quality. The more specific policies that follow each goal are primarily actions for the City to take and are not applicable at the project level. Those policies that can be applicable at the project level, and the project's consistency with them, are presented below in **Table 11, Project Consistency with the General Plan Air Quality Element**.

Table 11
Project Consistency with the General Plan Air Quality Element

| Goals and Policies | Consistency Analysis |
|---|--|
| <i>Goal 1: Good air quality in an environment of continued population growth and healthy economic structure.</i> | |
| Policy 1.3.1 – Minimize particulate emissions from construction sites. | Consistent: The project would minimize particulate emissions during construction through implementation SCAQMD Rule 403 which requires construction projects to implement an aggressive dust control program. |
| Policy 1.3.2 – Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic. | Not Applicable: The project does not include the construction of unpaved roads or parking lots. During construction activities dust from unpaved surfaces will be controlled per SCAQMD Rule 403. |
| <i>Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.</i> | |
| Policy 2.2.2 – Encourage multi-occupant vehicle travel and discourage single occupant vehicle travel by instituting parking management practices. | Consistent: The project incorporates 39 short-term and 165 long-term bicycle parking spaces to encourage alternative transportation, and has a reduction of residential parking spaces from the code requirement. Pursuant to the LAMC a total of 333 parking spaces would be required for the residential units. The Density Bonus Law allows housing projects with 11 percent very low income units within 1/2 mile of accessible major transit stop to provide .5 parking spaces per unit. The project is therefore providing 1 space for each two-bedroom unit and .5 spaces for each other unit, for a total of 139 residential parking spaces, which will help discourage single-occupant vehicle travel. |
| <i>Goal 3: Efficient management of transportation facilities</i> | |

| Goals and Policies | Consistency Analysis |
|---|---|
| <i>and system infrastructure using cost-effective system management and innovative demand management techniques.</i> | |
| There are no project-applicable policies associated with Goal 3. | |
| <i>Goal 4: Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.</i> | |
| Policy 4.2.3 – Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles. | Consistent: The project incorporates 39 short-term and 165 long-term bicycle parking spaces, and per the California Building Code provides a total of 124 EV capable parking spaces. Adjacent sidewalks will be repaired or reconfigured per City standards, and the project provides 139 residential parking spaces rather than the code requirement of 333, which will help encourage a reduction in car dependency and use of nearby transit. |
| Policy 4.2.4 – Require that air quality impacts be a consideration in the review and approval of all discretionary projects. | Consistent: The project’s potential air quality and GHG impacts are assessed in this document. |
| Policy 4.2.5 – Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects. | Consistent: The project incorporates 39 short-term and 165 long-term bicycle parking spaces to encourage alternative transportation, and has a reduction of residential parking spaces from the code requirement. Pursuant to the LAMC a total of 333 parking spaces would be required for the residential units. The Density Bonus Law allows housing projects with 11 percent very low income units within 1/2 mile of accessible major transit stop to provide .5 parking spaces per unit. The project is therefore providing 1 space for each two-bedroom unit and .5 spaces for each other unit, for a total of 139 residential parking spaces, which will help reduce vehicle trips and encourage transit use. |
| <i>Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.</i> | |
| Policy 5.1.4 – Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling. | Consistent: Pursuant to LAMC Section 99.04.408.1, the Project would be required to divert at least 50 percent of construction and demolition waste from landfills as a condition of permitting. The project is also required to have a recycling program in place during operations pursuant to AB 341 and LA’s Green New Deal which aims to achieve zero waste by 2050. |
| <i>Goal 6: Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.</i> | |
| There are no project-applicable policies associated with Goal 6. | |
| Source: The City of Los Angeles, Air Quality Element, Adopted November 24, 1992. | |

Mobility Plan 2035

The Mobility Plan 2035, a subsection of the City General Plan, provides a policy foundation for achieving a transportation system that balances the needs of all road users and includes goals to target GHG emissions reductions through a more sustainable transportation system. Strategies to achieve this goal include utilizing land use policies aimed at shortening the distance between housing, jobs and services; offering more attractive non-vehicular alternatives; and creating Transit Demand Management (TDM) programs to support Citywide reductions in Vehicle Miles Traveled (VMT) per capita. The project is consistent with these goals of the Mobility Plan 2035, as it represents urban infill development that would increase land use density within an area that is comprised of high density urban development, and would be a mixed-use development providing a combination of residential, office, and retail uses within the same project site. Additionally, the project would provide long-term and short-term bicycle parking for residents and visitors, would provide solar-ready roof areas, and a total of 124 electric vehicle (EV) capable parking spaces.

The project site is located within a TOC (Tier 3),⁸ within approximately 0.4 mile walking distance from two subway stations, and several bus stops serviced by a variety of local and regional carriers are within the project vicinity. The nearest bus stop is located on 8th Street within approximately 65 feet of the project site. The project area is also served by bus transit along 9th Street, Wilshire Boulevard, and Western Avenue, among many other routes in the vicinity. Bus service in the near vicinity include Los Angeles Department of Transportation's (LADOT) Downtown Area Short Hop (DASH) Wilshire Center/Koreatown routes, as well as multiple lines provided by Metro. These existing area transit features encourage the use of alternative transportation modes that would reduce VMT per capita. Further, the project site and vicinity are served by an existing sidewalk network providing pedestrian access for future residents and users of the project site to the surrounding community, which also encourages use of transportation alternatives that reduce VMT, and would be consistent with the goal of the Mobility Plan 2035 to increase the use of alternative transportation modes.

Green LA Plan and ClimateLA

The Green LA Plan (adopted April 2007) is the City's CAP and aims to reduce GHG emissions to 35 percent below 1990 levels by 2030 by increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles. To facilitate the implementation of these overarching goals, in 2008 the City adopted ClimateLA, an implementation program that provides detailed information about each action item discussed in the Green LA Plan framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings, to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption. Information about proposed and/or ongoing programs, opportunities for achieving the City's goals, specific challenges, and a list of milestones is provided for each action item. The scope of these actions range from those impacting only municipal facilities, such as retrofitting City Hall with high efficiency lighting systems, to those facilitating changes in the private sector, such as rebates for the purchase of energy-efficient appliances.⁹

Table 12, Project Consistency with the Green LA Plan and ClimateLA Actions, includes the evaluation of project consistency with the various strategies presented in the Green LA Plan and Climate LA. As demonstrated below, the project would not be in conflict with the goals of the Green LA Plan or actions and strategies of ClimateLA to reduce GHG emissions to 35 percent below 1990 levels by 2030 by

⁸ City of Los Angeles, Department of City Planning, Zoning Information and Map Access System (ZIMAS), Available at <http://zimas.lacity.org/>, Accessed on July 16, 2022.

⁹ City of Los Angeles, December 2008, ClimateLA Program Document.

increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

Table 12
Project Consistency with the Green LA Plan and ClimateLA Actions

| Action | Actions and Strategies | Consistency Analysis |
|---------------------------|---|---|
| Focus Area: Energy | | |
| Action E1 | Meet the goal to increase renewable energy from solar, wind, biomass, and geothermal sources to 20 percent by 2010. | Not Applicable. This action does not apply directly to the project, as the Los Angeles Department of Water and Power (LADWP) and other utility providers are responsible for meeting these goals. The LADWP met the goal of increasing renewable energy to 20 percent by 2010. |
| Action E2 | Increase use of renewable energy to 35 percent by 2020. | Not Applicable. This action does not apply directly to the project, as the LADWP and other utility providers are responsible for achieving this goal. The LADWP is working aggressively to expand Los Angeles' supply of renewable resources, including wind, solar, geothermal, biomass, and small hydroelectric power. In 2016, LADWP achieved a 29 percent renewable portfolio (based on preliminary estimates), surpassing the State-legislated requirement of 25 percent renewable energy. The LADWP is on track to exceed the next State-legislated milestone by 2020 and aims to achieve 50 percent renewable energy by 2025. ¹⁰ The project would not inhibit the City's ability to meet this goal. |
| Action E3 | Reduce the use of coal-fired power plants. | Not Applicable. This action does not directly apply to the project, as the LADWP and other utility providers are responsible for meeting this goal. The LADWP aims to transition from coal-fired power plants to lower emitting CO ₂ sources. The project would not conflict with the City's ability to implement this action. |
| Action E4 | Increase the efficiency of natural gas-fired power plants. | Not Applicable. This action does not directly apply to the project. The local utility providers serving the project site aim to utilize gas turbines, which are 15 percent more fuel efficient at generating electricity than steam boilers. The project would not conflict with the City's ability to implement this action. |
| Action E5 | Increase biogas co-firing of natural gas-fired power plants. | Not Applicable. This action does not directly apply to the project, as the LADWP, Los Angeles Sanitation and Environment (LASAN), and other utility providers are responsible for implementation. These entities plan to increase the combustion of biogas and will displace a portion of natural gas usage at power plants, thus reducing GHG emissions. |

¹⁰ Los Angeles Department of Water and Power. Renewable Energy Program, Available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-renewableenergypolicy?_adf.ctrl-state=ip46nby85_4&_afLoop=1164600650684685. Accessed on July 12, 2022.

| Action | Actions and Strategies | Consistency Analysis |
|------------|---|--|
| Action E6 | Present a comprehensive set of green building policies to guide and support private sector development. | Consistent. The project is designed to comply with green building standards, including the CALGreen and the LAGBC to reduce energy consumption. As the project is designed to meet comprehensive building policies, it would be consistent with this goal. |
| Action E7 | Reduce energy use by all City departments to the maximum extent feasible. | Consistent. Although City facilities are responsible for meeting these standards, the project would comply with CALGreen and the LAGBC. Therefore, the project would be consistent with City actions to reduce energy use. |
| Action E8 | Complete energy efficiency retrofits of all City-owned buildings to maximize energy efficiency and reduce energy consumption. | Not Applicable. This action does not apply to the project as it is not a City-owned building. However, the proposed new structure would be constructed to comply with CALGreen and the LAGBC. Therefore, the project would be consistent with City actions to maximize energy efficiency of buildings and reduce energy consumption. |
| Action E9 | Install the equivalent of 50 “cool roofs” on new or remodeled City buildings. | Consistent. Although City facilities are responsible for meeting this standard, the project would provide a vegetated green roof on a portion of the structure’s roof, consistent with this action. |
| Action E10 | Install solar heating for all City-owned swimming pools. | Not Applicable. This action does not apply to the project, as it does not include a City-owned swimming pool (nor does the project contain a private swimming pool). |
| Action E11 | Improve energy efficiency at drinking water treatment and distribution facilities. | Not Applicable. This action does not directly apply to the project, as the LADWP and other utility providers are responsible for meeting this goal. The LADWP aims to develop a design specification for water treatment and distribution facilities that includes high efficiency motors, lighting, and other efficient measures. |
| Action E12 | Maximize energy efficiency of wastewater treatment equipment. | Not Applicable. This action does not directly apply to the project, as the LADWP and LASAN are responsible for meeting this goal. Agencies would employ energy saving usage tactics, such as investigating and testing modifications to treatment processes, and researching the availability of more energy-efficient treatment equipment. |
| Action E13 | Distribute two compact fluorescent light (CFL) bulbs to each of the 1.4 million households in the City. | Not Applicable. This action does not directly apply to the project, as the LADWP and other City agencies are responsible for implementation. |
| Action E14 | Increase the level and types of customer rebates for energy efficient appliances, windows, lighting, and heating and cooling systems. | Not Applicable. This goal would not directly apply to the project, as the LADWP and other agencies are responsible for implementation. However, the project would be constructed to current code standards regarding energy efficient building methods, lighting, and appliances. The project would therefore not interfere with the City’s ability to implement this action. |
| Action E15 | Increase the distribution of energy efficient refrigerators to qualified customers. | Not Applicable. This action does not directly apply to the project, as the LADWP and other agencies are responsible for implementation. |

| Action | Actions and Strategies | Consistency Analysis |
|-----------------------------------|--|--|
| Action E16 | Create a fund to “acquire” energy savings as a resource from LADWP customers. | Not Applicable. This goal does not directly apply to the project, as it would be the responsibility of the LADWP and/or other City agencies to establish a fund that would reward customers for conservation efforts. |
| Focus Area: Water | | |
| Action W1 | Meet all additional demand for water resulting from growth through water conservation and recycling. | Consistent. Although City facilities are responsible for implementing these actions, the project would incorporate water saving fixtures as required by current codes, and would therefore be consistent with Citywide water conservation efforts. |
| Action W2 | Reduce per capita water consumption by 20 percent. | |
| Action W3 | Implement the City’s innovative water and wastewater integrated resources plan that will increase conservation, and maximize use of recycled water, including capture and reuse of stormwater. | |
| Focus Area: Transportation | | |
| Action T1 | Require 85 percent of the City fleet to be powered by alternative fuels. | Not Applicable. This does not directly apply to the project, as City agencies are responsible for implementation. The project would not interfere with the City’s ability to do so. |
| Action T2 | Convert 100 percent of City refuse collection trucks and street sweepers to alternative fuels. | Not Applicable. This does not directly apply to the project, as City agencies are responsible for implementation. The project would not interfere with the City’s ability to do so. |
| Action T3 (Metro) | Convert 100 percent of Metro buses to alternative fuels. | Not Applicable. This does not directly apply to the project, as City agencies are responsible for carrying out this action. In 2011, Metro retired its last diesel bus and became the first major transit agency to operate only clean fuel buses. ¹¹ |
| Action T3 (DOT) | Convert 100 percent of DOT commuter express diesel buses to alternative fuel. | Not Applicable. This does not directly apply to the project, as the LADOT and other City agencies are responsible for implementation. The project would not conflict with this action. |
| Action T4 | Complete the Automated Traffic Surveillance and Control System (ATSAC). | Not Applicable. The LADOT and other agencies are responsible for implementing this action. These computer-based systems adjust and optimize traffic signal timing in response to current traffic demands. The project would not conflict with this action. |
| Action T5 | Expand FlyAway shuttles serving LAX and other regional airports, and convert existing FlyAway buses to alternative fuels. | Not Applicable. Other agencies are responsible for implementing this action. FlyAway shuttles that provide transit service to the Los Angeles International Airport (LAX) from several Los Angeles locations reduce the number of private vehicles traveling to the airport and provide convenient passenger pick-up and drop-off |

¹¹ Los Angeles County Metropolitan Transportation Authority, Metro Retires Last Diesel Bus, Becomes World’s First Major Transit Agency to Operate Only Clean Fuel Buses, available at: https://www.metro.net/news/simple_pr/metro-retires-last-diesel-bus/, accessed on July 12, 2019.

| Action | Actions and Strategies | Consistency Analysis |
|-----------------------------|---|--|
| | | locations and parking. The project would not conflict with the City's ability to achieve this action. |
| Action T6 | Make transit information easily available, understandable, and translated into multiple languages. | Not Applicable. The LADOT, Metro, and other City agencies are primarily responsible for implementing this action. The project would not conflict with the City's ability to achieve this action. |
| Action T7 | Increase the City employee participation in the rideshare program and increase the subsidy for use of mass transit. | Not Applicable. This action applies to City employees and is not directly relevant to private development such as the project. The project would not inhibit the City's ability to take this action. |
| Action T8 | Promote walking and biking to work, within neighborhoods, and to large events and venues. | Consistent. The project would promote walking and biking to work and within neighborhoods, as it is infill development located in a Transit Priority Area (TPA) and Transit Oriented Community (TOC). The project includes live/work units, reducing anticipated project-related commuting. Also, the project provides a mix of residential, commercial, and office land uses in a highly urbanized area. Nearby features such as transit options, offices, restaurants, and entertainment facilities would further promote walking and alternative modes of transportation to and from the project site. |
| Action T9 | Expand the regional rail network. | Not Applicable. Metro is primarily responsible for implementing this action. The project site is in close proximity to an existing Metro rail station, from which connections can be made to additional lines, including the regional Metrolink system. The project would not interfere with the City's ability to implement this action. |
| Focus Area: Land Use | | |
| Action LU1 | Promote high-density housing close to major transportation stops (same as Action Items LU3 and LU6). | Consistent. The project would provide high-density housing near major transit corridors including a Metro station and bus stops, bicycle lanes, and pedestrian sidewalks. |
| Action LU2 | Promote and implement TOD. | Consistent. The project is a mixed-use development, with high-density residential units, live/work units, and commercial space near major transit corridors including a Metro rail station and bus lines. |
| Action LU3 | Make available underutilized City land for housing and mixed-use development. | Consistent. Although this action applies to lands owned by the City rather than private land such as the project site, the project would redevelop a privately held property with mixed-use development including higher density housing, which would be consistent with the aim of this action. |
| Action LU4 | Make available underutilized City land for parks and open space. | Not Applicable. This action does not apply to the project, as the project site is comprised of privately-owned land not held by the City. |

| Action | Actions and Strategies | Consistency Analysis |
|--|--|--|
| Action LU5 | Clean up brownfields sites for community economic revitalization projects and open space. | Not Applicable. The action does not apply to the project, as the project site is not a designated brownfield site. |
| Action LU6 | Make available underutilized City land within 1,500 feet of transit for housing and mixed-use development. | Consistent. Although this action applies to lands owned by the City rather than private land such as the project site, the project would redevelop a privately held property within 1,500 feet of transit with mixed-use development including higher density housing, which would be consistent with the aim of this action. |
| Focus Area: Waste | | |
| Action WsT1 | Reduce or recycle 70 percent of trash by 2015. | Consistent. According to the 2013 Zero Waste Progress Report, the City's solid waste collection and handling providers as well as recycling facilities, have achieved a landfill diversion rate of 76.4 percent. This diversion rate exceeds the AB 939-required diversion rate of 50 percent. ¹² The project would provide onsite bins for separating recycling waste consistent with the City's goals for waste reduction/recycling. |
| Focus Area: Open Space and Greening | | |
| OS/G1 | Create 35 new parks. | Not Applicable. It is primarily the responsibility of the City Department of Recreation and Parks (RAP) to identify suitable sites and create new parks and joint-use sites. The project would provide additional "greening" with onsite landscaping, including a green roof, and would not interfere with the City's ability to implement this action. |
| OS/G6 | Collaborate and partner with schools to create more parks in neighborhoods. | Not Applicable. The project would not interfere with the City's ability to implement this action. |
| OS/G2 | Revitalize the Los Angeles River to create open space opportunities along the 32-mile corridor within the City of Los Angeles. | Not Applicable. The project site not located along the Los Angeles River, and therefore, would not interfere with the City's ability to implement this action. |
| OS/G3 | Plant 1 million trees throughout Los Angeles. | Consistent. The project would be required to meet current codes regarding retention or replacement of street trees, thereby assisting the City in meeting this goal. |
| OS/G4 | Identify opportunities to "daylight" streams. | Not Applicable. This action does not apply directly to the proposed urban infill project, which does not include a stream onsite. |

¹² City of Los Angeles, Environment: LA Sanitation, Adopted April 2015, City of Los Angeles Solid Waste Integrated Resources Plan – A Zero Waste Master Plan.

| Action | Actions and Strategies | Consistency Analysis |
|---|--|--|
| OS/G5 | Identify and develop promising locations for stormwater infiltration to recharge groundwater aquifers. | Consistent. The project site is currently fully built out, with predominantly impervious surfaces. The project would not substantially alter the percentage of impervious surfaces within the surrounding urban area, and would be required to provide stormwater management features consistent with applicable codes. |
| Sources: The City of Los Angeles, Green LA: An Action Plan to Lead the Nation in Fighting Global Warming, May 2007. City of Los Angeles, ClimateLA Program Document, December 2008. | | |

Sustainable City pLAn 2019 (LA's Green New Deal)

The Sustainable City pLAn 2019 provides targets, milestones, and initiatives for reaching short-term and long-term sustainability goals. The specified targets of the Sustainable City pLAn 2019 consist of the following items:

Environmental Justice Targets

- Improve the raw scores of CalEnviroScreen indicators of City communities in the top 10 percent by an average of 25 percent by 2025; and 50 percent by 2035.
- Reduce the number of annual childhood asthma-related emergency room visits in the City's most contaminated neighborhoods to less than 14 per 1,000 children by 2025; and eight per 1,000 children by 2035.

Renewable Energy Targets

- LADWP will supply 55 percent renewable energy by 2025; 80 percent by 2036; and 100 percent by 2045.
- Increase cumulative MW by 2025; 2035; and 2050 of: Local solar to 900-1,500 MW, 1,500-1,800 MW, and 1,950 MW; energy storage capacity to 1,654-1,750 MW, 3,000 MW, and 4,000 MW, and demand response programs to 234 MW (2025) and 600 MW (2035).

Local Water Targets

- Source 70 percent of the City's water locally and capture 150,000 acre-feet/year of stormwater by 2035.
- Recycle 100 percent of all wastewater for beneficial reuse by 2035.
- Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050.
- Reduce potable water use per capita by 22.5 percent by 2025; and 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned buildings and public properties such as parks, by 2035.

Clean and Healthy Buildings Targets

- All new buildings will be net zero carbon by 2030; and 100 percent of buildings will be net zero carbon by 2050.

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- Reduce building energy use per sf for all building types: 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050.

Housing and Development Targets

- End street homelessness by 2028.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1500 ft of transit by 2025; and 75 percent by 2035.
- Create or preserve 50,000 income-restricted affordable housing units by 2035 and increase stability for renters.

Mobility and Public Transit Targets

- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025; 50 percent by 2035; and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Ensure Los Angeles is prepared for Autonomous Vehicles by the 2028 Olympic and Paralympic Games.

Zero Emission Vehicles Targets

- Increase the percentage of electric and zero emission vehicles in the City to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Electrify 100 percent of Metro and LADOT buses by 2030.
- Reduce port-related GHG emissions by 80 percent by 2050.

Industrial Emissions and Air Quality Monitoring Targets

- The City will reach the U.S. EPA parts per billion ozone attainment standard by 2025 and meet all future compliance dates.
- Reduce industrial emissions by 38 percent by 2035; and 82 percent by 2050.
- Reduce methane leak emissions by 54 percent by 2035; and 80 percent by 2050.

Waste and Resource Recovery Targets

- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035; and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028.
- Eliminate organic waste going to landfill by 2028.
- Increase proportion of waste products and recyclables productively reused and/or repurposed within Los Angeles County to at least 25 percent by 2025; and 50 percent by 2035.

Food Systems Targets

- Ensure all low-income Angelenos live within 0.5 mile of fresh food by 2035.

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- Increase the number of urban agriculture sites in the City by at least 25 percent by 2025; and 50 percent by 2035.
 - Prepare for natural disasters by increasing the resiliency of our food systems infrastructure.

Urban Ecosystems and Resilience Targets

- Increase tree canopy in areas of greatest need by at least 50 percent by 2028.
- Complete or initiate restoration identified in the ‘ARBOR’ Plan by 2035.
- Create a fully connected LARiverWay public access system that includes 32 miles of bike paths and trails by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and three degrees by 2035.
- Ensure proportion of Angelenos living within 0.5 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.
- Achieve and maintain ‘no-net loss’ of native biodiversity by 2035.

Prosperity and Green Jobs Targets

- Create 300,000 green jobs by 2035, and 400,000 green jobs by 2050.
- Increase private sector green investment in the City by \$750 million by 2025; and \$2 billion by 2035.
- Eliminate unemployment rate gap between the City and Los Angeles County.

Lead by Example Targets

- Reduce municipal GHG 55 percent by 2025; 65 percent by 2035; and reach carbon neutral by 2045.
- Reduce municipal energy use by 18 percent by 2025; 35 percent by 2035; and 44 percent by 2050.
- Reduce municipal water use by at least 25 percent by 2025; and 30 percent by 2035.
- Lead on zero waste and achieve a zero waste City Hall by 2025.
- Convert all City fleet vehicles to zero emission where technically feasible by 2028.
- Ensure all new municipally owned buildings and major renovations will be all-electric, effective immediately.
- Reach 2 million Angelenos through outreach, education, and training programs by 2025.

The project would be consistent with the emissions reduction and energy and water efficiency targets of the Sustainable City pLAn associated with individual project development, as it would comply with the performance requirements specified in the City’s Building Code, including water and electricity use efficiency requirements. The project site would redevelop an underutilized infill property (including a surface parking lot) within an urbanized area, where multiple modes of transportation alternatives are available, including adjacent or nearby bus stops serviced by various routes, a Metro rail station, and pedestrian sidewalks. The project site is located within walking distance of multiple office, restaurant, retail, and entertainment opportunities that can be accessed by the project’s residents without the use of personal vehicles. Additionally, the propose mixed-use development would incorporate high-density residential units, live/work units, and commercial space, providing opportunities for future residents to live, work, and shop onsite. Therefore, the project would promote sustainability and would be consistent with the Sustainable City pLAn.

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles traveled (VMT) and improvements to the transportation system. As the majority of the GHG emissions are related to the transportation sector, reducing VMT would reduce overall GHG emissions. The RTP/SCS “Core Vision” centers on maintaining and better managing the region’s transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Key to the RTP/SCS is to direct growth of housing and jobs to High Quality Transit Areas (HQTAs), which are defined as within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The project site is located within a designated HQTAs,¹³ with existing multimodal transportation options that include two subway stations within approximately 0.4 miles walking distance. An analysis of the project’s consistency with the RTP/SCS strategies is provided in **Table 13, Consistency with the 2020-2045 RTP/SCS**.

Table 13
Consistency with the 2020-2045 RTP/SCS

| Strategies | Consistency Analysis |
|--|---|
| Focus Growth Near Destinations & Mobility Options | |
| Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations. | Consistent. The project would be consistent with a land use pattern that facilitates multimodal access to work, educational and other destinations. The RTP/SCS designates the project site vicinity as a high quality transit area (HQTAs), with existing multimodal transportation options that include two subway stations within approximately 0.4 miles walking distance, and several bus stops serviced by a variety of local and regional carriers. The nearest bus stop is located within approximately 65 feet of the project site. |
| Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets. | |
| Plan for growth near transit investments and support implementation of first/last mile strategies. | |
| Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses. | |
| Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods. | |
| Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations). | |
| Identify ways to “right size” parking requirements and | The project would replace an existing commercial development and associated parking lot, and a single-family residence on an infill property to accommodate new growth. The project design is a mixed-use development that is located along a commercial use corridor close to existing destinations (retail, office, restaurants, etc.) |

¹³ Southern California Association of Governments, High Quality Transit Areas (HQTAs) 2045 – SCAG Region, Accessed June 11, 2021 at <https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2045-scag-region/explore?location=34.152729%2C-117.742800%2C9.41>

| Strategies | Consistency Analysis |
|---|---|
| promote alternative parking strategies (e.g. shared parking or smart parking). | |
| Promote Diverse Housing Choices | |
| <p>Preserve and rehabilitate affordable housing and prevent displacement.</p> <p>Identify funding opportunities for new workforce and affordable housing development.</p> <p>Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.</p> <p>Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.</p> | <p>Consistent. The project would be consistent with the promotion of diverse housing as it would replace one single-family residence and provide 251 multi-family residential units, 11 percent of which would be designated for affordable housing (very low income).</p> |
| Leverage Technology Innovations | |
| Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space. | <p>Consistent. This strategy is aimed at public entities. However, the project would provide electric vehicle (EV) ready parking spaces to comply with applicable standards, and the circulation driveway would incorporate a ride sharing pick up and drop off area. As a mixed-use development located within an HQTa with various existing transit options, the project would not conflict with this action/strategy.</p> |
| Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi modal payments. | <p>Consistent. This strategy is aimed at public entities. However, the project has been designed to include residential units, including live/work units, creative office space, and commercial space, providing options for residents to potentially avoid or limit daily work commutes. The project would not conflict with this action/strategy.</p> |
| Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation. | <p>Not Applicable. Implementation of this strategy would be beyond the scope of the project. However, the project would not interfere with governments or communities pursuing micro-power grids and would not conflict with this action/strategy.</p> |
| Support Implementation of Sustainability Policies | |
| Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions. | <p>Not Applicable. This strategy is aimed at public entities. However, the project proposes to provide a mixed-use development within a HQTa that supports the reduction of GHG emissions by reducing the need for individual automobile use and would not interfere with this action/strategy.</p> |
| Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations. | <p>Not Applicable. It would not be within the purview of the project to affect SCAG support of statewide legislation. However, the project proposes to provide a mixed-use development within a HQTa that supports the reduction of GHG emissions by reducing the need for individual automobile use and would not interfere with this action/strategy.</p> |

| Strategies | Consistency Analysis |
|---|---|
| Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space. | Not Applicable. Implementation of this strategy would be an agency responsibility and would not be within the purview of the project. However, the project would not interfere with this action/strategy. |
| Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies. | Not Applicable. Implementation of this strategy is an agency responsibility and would not be within the purview of the project. However, the project would not interfere with local agencies pursuing such opportunities and would not conflict with this strategy. |
| Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region. | Not Applicable. Implementation of this strategy is an agency responsibility and would not be within the purview of the project. However, the project would not interfere with local agencies pursuing such partnerships and would not conflict with this action/strategy. |
| Continue to support long range planning efforts by local jurisdictions. | Not Applicable. Supporting long range planning efforts would be a responsibility of SCAG. However, the project would not interfere with SCAG supporting such planning efforts and would not conflict with this action/strategy. |
| Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy. | Not Applicable. Educating local decision makers on implementation of the Sustainable Communities Strategy (SCS) is a role for SCAG and/or other SCAG-area public agencies and would not be within the purview of the project. However, the project would not interfere with provision of such opportunities and would not conflict with this action/strategy. |
| Promote a Green Region | |
| <p>Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.</p> <p>Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.</p> <p>Integrate local food production into the regional landscape.</p> <p>Promote more resource efficient development focused on conservation, recycling and reclamation.</p> <p>Preserve, enhance and restore regional wildlife connectivity.</p> <p>Reduce consumption of resource areas, including agricultural land.</p> <p>Identify ways to improve access to public park space.</p> | Not Applicable. These strategies are the responsibility of SCAG to implement. However, the project would be required to incorporate sustainable design features to conserve energy and water and reduce waste generation. The project would result in no impacts to agricultural land, food production, or wildlife connectivity, as it would redevelop an urban infill site. As such, the project would not interfere with SCAG supporting such planning efforts. |
| Source: Southern California Association of Governments. 2020-2045 RTP/SCS. September 3, 2020. | |

As shown in Table 12, the project would be located within a HQT, and would not conflict with implementation of the RTP/SCS strategies.

2017 Climate Change Scoping Plan

The CARB 2017 Climate Change Scoping Plan (2017 Scoping Plan) updated the 2008 Climate Change Scoping Plan in response to SB 32, to identify how the State can reach its 2030 target to reduce GHG emissions by 40 percent from 1990 levels and substantially advance toward the 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels. As shown by the policy consistency analysis below in **Table 14, Project Consistency with the 2017 Scoping Plan**, the Project would reduce GHG emissions in a manner that would not conflict with, nor impede the implementation of, the 2017 Scoping Plan policies.

Table 14
Project Consistency with the 2017 Scoping Plan

| Policy | Primary Objective | Consistency |
|---|--|---|
| SB 350 | Reduce GHG emissions in the electricity sector through the implementation of the 50 percent Renewable Portfolio Standard (RPS), doubling of energy savings, and other actions as appropriate to achieve GHG emissions reductions planning targets in the Integrated Resource Plan (IRP) process. | Consistent. The LADWP would be the electricity provider for the project and would be responsible for meeting the applicable RPS standards. However, as the project would be designed to meet or exceed current Title 24 Part 6 Building Efficiency Standards and would meet or exceed the mandatory standards of Title 24 Part 11 (CALGreen), the project would achieve energy savings that would support LADWP efforts to reach future RPS goals. |
| Low Carbon Fuel Standard (LCFS) | Transition to cleaner/less-polluting fuels that have a lower carbon footprint. | Consistent. Although it is not the responsibility of the Project to develop, adopt, or update the LCFS program, the LCFS would reduce the carbon intensity of transportation fuels that are consumed in California, including fuels used by residents, customers, or employees of the proposed mixed-use project. |
| Mobile Source Strategy (Cleaner Technology and Fuels [CTF] Scenario) | Reduce GHGs and other pollutants from the transportation sector through transition to zero emission and LEVs, cleaner transit systems and reduction of vehicle miles traveled. | Consistent. It is not the responsibility of the Project to introduce ZEVs or LEVs. However, the Project would provide EV ready parking spaces for future installation of charging facilities, which would promote the use of EVs in general to facilitate transition to zero emissions vehicles (ZEVs) and low emissions vehicles (LEVs). Additionally, the Project Site represents an urban/compact mixed-use infill location within a Transit Priority Area (TPA), with nearby transit facilities as well as retail, restaurant, and employment destinations, and would provide onsite bicycle parking facilities. |
| SB 1383 | Approve and Implement Short-Lived Climate Pollutant strategy to reduce highly potent GHGs | Not Applicable. The Project would not be responsible for implementing a Short-Lived Climate Pollutant strategy to reduce |

| Policy | Primary Objective | Consistency |
|---|--|--|
| | | highly potent GHGs. The project would not interfere with implementation of this policy. |
| California Sustainable Freight Action Plan | Improve freight efficiency, transition to zero emission technologies, and increase competitiveness of California's freight system. | Not Applicable. The Project would not be responsible for improving freight efficiency. The Project would consist of residential, office, and commercial uses which would not include substantial freight transportation or logistics centers. The project would not interfere with implementation of this policy. |
| Post-2020 Cap-and-Trade Program | Reduce GHGs across largest GHG emissions sources | Not Applicable. The Project would not be responsible for implementing a cap-and-trade program for large GHG emissions sources. The project would not interfere with implementation of this policy. |
| Source: California Air Resources Board. California's 2017 Climate Change Scoping Plan. November 2017. | | |

Plan Consistency Conclusion

In summary, the project's net increase in GHG emissions would be below the adopted significance threshold of 3,000 MTCO₂e suggested by the SCAQMD, and the project would not conflict with applicable policies of the City's Building Code, Green Building Code, Mobility Plan, Green LA, Sustainable City pLAN, SCAG RTP/SCS, or CARB 2017 Scoping Plan that have been adopted to reduce GHG emissions. Therefore, the project would not conflict with an applicable plan, policy or regulation adopted to reduce GHG emissions and potential impacts regarding GHG emissions during construction and operations would be less than significant. No mitigation measures would be required.