V. SUSTAINABLE COMMUNITIES ENVIRONMENTAL ANALYSIS

INTRODUCTION

This section of the SCEA contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, C.C.R. Title 14, Chapter 3, 15000-15387). The analytical methodology and thresholds of significance are based on the *L.A. CEQA Thresholds Guide.*

Pursuant to PRC Section §21155 .2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA would also be required identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. The following analysis discusses the following topics:

- Aesthetics
- Agriculture
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal and Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

IMPACT ANALYSIS

1. AESTHETICS

In January 2016 the City of Los Angeles Planning Department provided guidance in the form of Zoning Information File ZI No. 2451 regarding Transit Priority Areas (TPAs) and exemptions to analyze Aesthetics and Parking within TPAs pursuant to CEQA, as established in State Senate Bill (SB) 743.

Senate Bill 743, signed into law in September 2013, made several changes to CEQA for projects located in areas served by transit (i.e., TPAs). While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited 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 transit priority area.

Section 21099 (a) of the PRC defines the following terms:

(4) "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.

(7) "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned.

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

For purposes of Section 21099 of the PRC, a transit priority area also includes major transit stops in the City of Los Angeles (city) that are scheduled to be completed within the planning horizon of the Southern California Association of Governments (SCAG) Regional Transportation Plan / Sustainable Community Strategy (RTP/SCS).

All of the lots that make up the project are surrounded by existing development, thus qualifying the Project Site as an 'infill' site. In addition, the project consists of a senior housing community that is served by the DASH Hollywood line, directly abutting the property. Additionally, there are several major bus routes running along Franklin Avenue, Highland Avenue, Hollywood Boulevard, and Cahuenga Boulevard. The Project Site is less than one-half mile from the Hollywood/Highland Station of the Metro Red Line. For these reasons, the Proposed Project qualifies for this exemption, and the analysis below is provided for **informational purposes only.**

According to Appendix G of the State CEQA Guidelines, the impacts of a proposed project related to aesthetics would be considered significant if the project would:

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

This discussion is for informational purposes only. The Proposed Project is located in the City of Los Angeles, in a highly urbanized portion of the City approximately 0.4 miles west of U.S. Highway 101 (US 101). The nearest scenic view or vista to the Project Site are the Hollywood Hills, directly north of the Project Site. Due to the topography and the density of development in the project area, views of the hillsides are available only intermittently.

Although the Proposed Project would change existing views by added new structures, scenic views are typically defined as those that provide expansive views of a highly valued landscape for the benefit of the general public. The views available along developed corridors such as Highland Avenue and Hollywood Boulevard are generally expected to be intermittent and would continue to be so with construction of the Proposed Project. Therefore, even if the Project was not exempt from aesthetic impacts, it would not block or otherwise impede an existing view of a scenic vista and would, therefore, not have an adverse impact on a scenic vista.

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

This discussion is for informational purposes only. The Project Site is not located along or near a state scenic highway. Currently, the only portion of a scenic highway officially designated by the California Department of Transportation (Caltrans) within the City of Los Angeles is a short portion of the Pasadena Freeway (also known as the Arroyo Seco Historic parkway). A portion of Pacific Coast Highway (PCH), (beginning in the City of

Santa Monica and continuing north towards the City of Malibu), is eligible to be designated as a State Scenic Highway.[1]

For the above described reasons, even if the Project was not exempt from aesthetic impacts, the Proposed Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway, as none of these resources exist on or near the Project Site.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

This discussion is for informational purposes only. The proposed 6-story senior housing project would alter the existing visual character of the site. The buildings surrounding the Project Site vary in age and architectural style from more contemporary structures to buildings that were constructed during the 1920's. The proposed 6-story senior housing building would be consistent with the general urban character of the surrounding area and the existing uses in the immediate vicinity of the Project Site. The design features would be compatible with the design of the existing Montecito apartment building, which is 10 stories with a maximum height of approximately 130 feet. Furthermore, the proposed landscaping would include street trees, on-site ornamental trees, and planters that would enhance the overall visual character of the proposed structure at ground level. For these purposes, even in the Project was not exempt from the aesthetic impacts, the Project would not substantially degrade the existing visual character or quality of the site and its surroundings.

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

This discussion is for informational purposes only. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or

[1] *State of California Department of Transportation, California Scenic Highway Mapping System, http://www.dot.ca.gov/hq/tsip/gis/datalibrary/Metadata/ScenicHwys.html, accessed February 23, 2016.*

mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The Proposed Project will be constructed on an infill site. The Project Site is located in an urban environment characterized by high levels of ambient nighttime illumination. However, nighttime illumination levels are not high at the Project Site, which does not involve any nighttime activity or illumination. Uses surrounding the Project Site that are sensitive to light levels and glare include multi-family residential uses to the east, west and south.

Redevelopment of the Proposed Project would replace the open courtyard with a building that would be up to 6-stories high. The presence of a residential use along Franklin Avenue would increase the nighttime illumination on the Project Site from current levels. Lighting associated with the proposed residential uses would include interior lights, architectural and/or thematic accent lighting to highlight building elements or details, soft accent lighting for landscaping where appropriate, exterior security lighting, and wall- or pole-mounted light fixtures. All lighting of outdoor areas will be directed onto driveways, walkways, and parking areas and away from adjacent properties and public rights of way to avoid any light impacts from lighting fixtures included in the project. For these reasons, the new lighting established on the site will not result in a substantial increase in light that could adversely affect nighttime views in the area.

Glare from building windows would increase under the Proposed Project. However, prior to the issuance of a building permit, the type or categories of all exterior glass and architectural features on the building façades and rooftops would be submitted for review to the Department of Building and Safety to ensure that highly reflective materials are not utilized, and thus the project would not result in a substantial new source of glare that would adversely affect daytime views in the area.

Finally, the project will be required to incorporate lighting design specifications to meet City standards as outlined in the Section 93.0117 of the LAMC, to ensure that the project will have a less than significant impact on light and glare.

2. AGRICULTURE AND FOREST RESOURCES

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

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

No Impact. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category.[2] The Project Site is located within an urbanized area of the City of Los Angeles and is currently developed with a surface parking lot and an open courtyard. Therefore, implementation of the Proposed Project would not convert farmland to non-agricultural use. No impacts would occur.

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

No Impact. The Proposed Project is located in the Hollywood Community Plan Area and zoned [Q]R4-2 (Residential Zone). The General Plan land use designation for the Project Site is High Density Residential. The Project Site is not zoned for agricultural uses nor do agricultural uses occur on the Project Site. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly, the Project Site does not contain any lands covered by a Williamson Act contract. Therefore, implementation of the Proposed Project would not conflict with existing agricultural zoning or a Williamson Act Contract. No impacts would occur.

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[2] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County 2010 Important Farmland Map, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf, accessed September 8, 2017.*

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

No Impact. As discussed above the Project Site is zoned [Q]R4-2 and is located in an urban area. The Project Site and the surrounding area are zoned for primarily residential uses. The site and the surrounding area do not contain any forest land or land zoned for timberland production. Implementation of the Proposed Project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. No impacts would occur, and no further analysis is required.

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

No Impact. See response to **Section 2(c)**, above.

Additionally, forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[3] Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[4] Trees are located along the parkway and on the Project Site are all ornamental and their level of tree cover are not within the definitions of forest land or timberland.[5] There is no forest land or timberland on-site or in the project vicinity and project development would not cause a loss of forest land or timberland. No impacts would occur.

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

No Impact. See responses to **Sections 2(a)** through **2(d)**, above. The site is located in an urbanized area and there are no agricultural uses or related uses on the site. The site does not result in the conversion of farmland, to other uses. No impacts would occur.

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3 *California Public Resources Code Section 12220[g]*

4 *California Public Resources Code Section 4526*

5 ***Tree Case Management Tree Report, dated May 17, 2017*** *and included as* ***Appendix B*** *to this SCEA.*

3. AIR QUALITY

Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter (PM2.5), particulate matter ten microns or less in diameter (PM10), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. Inversions are an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air. The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.
- Ozone (O_3) is a colorless gas that is formed in the atmosphere when volatile organic compounds (VOC) and nitrogen oxides (NO_X) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of these two pollutants directly emitted into the atmosphere. The primary sources of VOC and NO_X, the components of O_3, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at

levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

- Nitrogen Dioxide (NO_2) like O_3, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_X and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM10. High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 parts per million (ppm).
- Sulfur Dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO_2 are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 can also yellow plant leaves and erode iron and steel.
- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or PM2.5, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, PM2.5 can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC. Inhalable particulate matter, or PM10, is about 1/7 the thickness of a human hair. Major sources of PM10 include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

  PM2.5 and PM10 pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM2.5 and PM10 can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and

nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM10 tends to collect in the upper portion of the respiratory system, PM2.5 is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become emission sources of greater concern.

  Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

- Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

Regulatory Setting

Federal

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. It has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission

standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by the State.

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, PM2.5, PM10, SO_2, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in **Table V-1**. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O_3 and $PM_{2.5}$, attainment for PM_{10}, and attainment/unclassified for CO and NO_2.

State

California Air Resources Board (CARB). In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in **Table V-1, State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin**.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Table V-1
State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m³)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m³)	/a/	0.075 ppm (147 µg/m³)	Nonattainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m³	Nonattainment	150 µg/m³	Attainment
	Annual Arithmetic Mean	20 µg/m³	Nonattainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m³	Nonattainment
	Annual Arithmetic Mean	12 µg/m³	Nonattainment	12 µg/m³	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m³)	Attainment	9 ppm (10 mg/m³)	Maintenance
	1-hour	20 ppm (23 mg/m³)	Attainment	35 ppm (40 mg/m³)	Maintenance
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)	Attainment	53 ppb (100 µg/m³)	Unclassified/ Attainment
	1-hour	0.18 ppm (338 µg/m³)	Attainment	100 ppb (188 µg/m³)	Unclassified/ Attainment
Sulfur Dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m³)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m³)	Attainment	75 ppb (196 µg/m³)	Attainment
Lead (Pb)	30-day average	1.5 µg/m³	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m³	Nonattainment

/a/ CARB has not determined 8-hour O_3 attainment status.
Source: California Air Resources Board, Ambient Air Quality Standards, and attainment status, accessed August 1, 2016 (www.arb.ca.gov/desig/adm/adm.htm)

Local

South Coast Air Quality Management District (SCAQMD). The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to

attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers 6,745 square miles and 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 Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD regularly prepares an Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour $PM_{2.5}$ strategy standard. In October 2016, the SCAQMD's released its revised Draft 2016 AQMP which proposed strategies to meet the NAAQS for the 8-hour ozone standard by 2032, the annual $PM_{2.5}$ standard by 2021-2025, the 1-hour ozone standard by 2023, and the 24-hour $PM_{2.5}$ standard by 2019. In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

The Southern California Association of Governments (SCAG) assists in air quality planning efforts by preparing the transportation portion of the AQMP through the adoption of its Regional Transportation Plan (RTP). This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in State law. In April 2016, SCAG adopted its 2016-2040 RTP, a plan to invest $556.5 billion in transportation systems over a six-county region.

City of Los Angeles. The City's General Plan includes an Air Quality Element that provides a policy framework governing air quality planning within the City of Los Angeles. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air vision.

In 2006, the City released its L.A. CEQA Thresholds Guide that provides guidance in the preparation of environmental documents. This included a chapter focusing on air quality. While

it didn't set new thresholds of significance for air quality, it did suggest a process for evaluating projects and attempted to standardize analyses through prescribed protocols.

Air Pollution Climatology

The Project Site is located within the Los Angeles County non-desert portion of the South Coast Air Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains.

Air quality problems also occur during the fall and winter, when CO and NO_2 emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 PM) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO_2 concentrations are also generally higher during fall and winter days.

Air Monitoring Data

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project Site is located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. **Table V-2, 2014-2016 Ambient Air Quality Data in Project Vicinity** shows pollutant levels, State and federal

standards, and the number of exceedances recorded in the area from 2014 through 2016. The one-hour State standard for O_3 was exceeded three times during this three-year period, the daily State standard for PM10 was exceeded eight times while the daily State standard for PM2.5 was exceeded five times. CO and NO_2 levels did not exceed the CAAQS from 2014-2016.

Table V-2
2014-2016 Ambient Air Quality Data in Project Vicinity

Pollutant	Pollutant Concentration & Standards	Central Los Angeles		
		2014	2015	2016
Ozone	Maximum 1-hour Concentration (ppm)	0.113	0.104	0.103
	Days > 0.09 ppm (State 1-hour standard)	3	2	2
	Days > 0.075 ppm (Federal 8-hour standard)	2	0	1
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	3	3.2	1.9
	Days > 20 ppm (State 1-hour standard)	N/A	N/A	N/A
	Maximum 8-hour Concentration (ppm)	2.0	1.8	1.4
	Days > 9.0 ppm (State 8-hour standard)	N/A	N/A	N/A
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0821	0.0624	0.0647
	Days > 0.18 ppm (State 1-hour standard)	N/A	N/A	N/A
PM_{10}	Maximum 24-hour Concentration (μg/m³)	87	88	67
	Days > 50 μg/m³ (State 24-hour standard)	32	26	18
$PM_{2.5}$	Maximum 24-hour Concentration (μg/m³)	59.9	56.4	44.39
	Days > 35 μg/m³ (Federal 24-hour standard)	6	7	2
Sulfur Dioxide	Maximum 24-hour Concentration (ppm)	N/A	N/A	N/A
	Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A

Source: SCAQMD annual monitoring data (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed January 10, 2018.
N/A: Not available at this monitoring station.

Toxic Air Pollution

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV), the incidence of cancer over a lifetime in the US population is about 1 in 3, which translates into a risk of about 300,000 in 1 million. One study, the *Harvard Report on Cancer Prevention*, estimated that, of cancers associated with known risk factors, about 30 percent were related to tobacco, 30 percent were related to diet and obesity, and about two percent were associated with environmental pollution related exposures. The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per million, this

would predict an additional 100 excess cases of cancer in a population of 1 million people over a 70-year lifetime.

As part of the SCAQMD's environmental justice initiatives adopted in late 1997, the SCAQMD adopted the MATES IV study in May 2015, which was a follow-up to the previous MATES I, II, and III air toxics studies conducted in the Basin. The MATES IV study was based on monitored data throughout the Basin and included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Basin from exposure to TACs. The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 897 in one million primarily due to diesel exhaust particulate matter (DPM). Using the MATES IV methodology, about 94 percent of cancer risk is attributed to emissions associated with mobile sources, about six percent of risk is attributed to toxics emitted from stationary sources, (e.g., industries, dry cleaners, and chrome plating operations). The MATES IV study found lower ambient concentrations of most of the measured air toxics, as compared to the levels measured in the previous MATES III study finalized in September 2008.

Thresholds of Significance

For the purposes of this analysis, air quality impacts of the Proposed Project would be considered significant if they would exceed the following standards of significance, which are based on Appendix G of the *2013 State CEQA Guidelines*. According to these guidelines, a project would normally have a significant impact on air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollution concentrations; or
- Create objectionable odors affecting a substantial number of people

The *State CEQA Guidelines* Section 15064.7 provides the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance. The potential air quality impacts of the Proposed Project are, therefore, evaluated according to thresholds developed by the SCAQMD

in their *CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook*, and subsequent guidance, which are listed below.

Existing Emissions

The Project Site includes is currently the site of an outdoor courtyard that supports the adjacent Montecito Apartments. As such, it does not generate anthropogenic emissions and is assumed to have de minimis emissions.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

There are several existing or reasonably foreseeable sensitive receptors near the Project Site, including:

- Montecito Apartments, 6650 Franklin Avenue, directly adjacent on-site.
- Canyon Co-Op School, 1820 North Las Palmas Avenue, 20 feet west of the Project Site
- Las Palmas Senior Citizen Center, 1820 North Las Palmas Avenue, 20 feet west of the Project Site
- Multi-family residences, 1847 North Cherokee Avenue; 5 feet south of the Project site
- Chateau Des Fleurs Apartments, 6626 Franklin Avenue; 185 feet east of the Project Site
- Multi-family residences, 6643 Franklin Avenue; 80 feet north of the Project Site
- Yucca Park, 6671 Yucca Street, 450 feet south of the Project Site.

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

Would the project:

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

No Impact. The Project Site is located within the South Coast Air Basin (SoCAB) and is subject to the Air Quality Management Plan (AQMP) prepared by the South Coast Air Quality Management District (SCAQMD).

The proposed residential land use will neither conflict with the SCAQMD's 2016 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by the Southern California Association of Governments (SCAG).

The SCAQMD has adopted a 2016 AQMP that focuses on achieving clean air standards while accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The 2016 RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020. The Draft 2016 RTP/SCS, released for public review on December 4, 2015, accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the City's Hollywood Community Plan area. The Community Plan implements land use standards of the General Plan Framework at the local level. The Project is consistent with the City's projected growth capacity for the Community Plan area, which accommodated a projected population of 219,000 persons by 2010.[6] The City has not updated projections beyond 2010 for the Community Plan area.

The Project would develop 68 new residential units in the City of Los Angeles. The Proposed Project could add 186 residents to the Plan area, based on the City's projected

6 City of Los Angeles, *Hollywood Community Plan*, www.cityplanning.lacity.org/complan/pdf/hwdcptxt.pdf. 2014.

household density in the City of Los Angeles.[7] This would marginally increase population in the South Coast Air Basin. The Project Site is classified as "Residential" in the General Plan, a zoning classification that allows residential uses. Further, the RTP/SCS' assumptions about growth in the City accommodate housing and population growth on this site. As such, the Project does not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

Table V-3
Project Consistency with Air Quality Management Plan's Growth Forecast

Forecast Year	Population in City of Los Angeles	Proposed Project	Households in City of Los Angeles	Proposed Project	Employment in City of Los Angeles	Proposed Project
2008	3,770,500	186	1,309,900	68	35,900	0
2020	3,991,700		1,455,700		37,100	
2035	4,320,600		1,626,600		38,600	

Source: DKA Planning 2016 based on SCAG 2012 Regional Transportation Plan Growth Forecast. Assumes 2.74 persons per household per 2016 RTP/SCS.

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As illustrated in **Table V-4**, **Project Consistency with City of Los Angeles General Plan - Air Quality Element**, the Proposed Project is consistent with the applicable policies in the General Plan. As such, the proposed Project's impact on the City's General Plan would be considered less than significant.

Table V-4
Project Consistency with City of Los Angeles
General Plan - Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**Consistent.** The Proposed Project would minimize particulate emissions during construction through best practices required by SCAQMD Rule 403 (Fugitive Dust) and/or mitigation measures.
Policy 1.3.2. Minimize particulate emissions from unpaved roads	**Consistent.** The Proposed Project would

7 There would be a total of 67 new senior housing units and one unit set aside for an on-site manager. Thus the number of potential new residents presented is a worst-case scenario, given that the senior housing units will in all likelihood be occupied by a maximum of two persons, and in many cases by a sole occupant. Census statistics show that average household size decreases with age, especially after age 45, and is below two persons per household for households over age 65. National Association of Home Builders 50+ Housing Council, *Approving 55+ Housing: Facts That Matter*, https://www.winchester.us/DocumentCenter/View/1182, accessed October 16, 2017.

Table V-4
Project Consistency with City of Los Angeles
General Plan - Air Quality Element

Strategy	Project Consistency
and parking lots associated with vehicular traffic.	minimize particulate emissions from unpaved facilities through best practices required by SCAQMD Rule 403 (Fugitive Dust) and/or mitigation measures.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Not Applicable.** The Proposed Project is a residential project and could not implement these employer-based transportation demand management programs. Nonetheless, the Proposed Project's location in an urban area with significant public transit could support these transportation demand management goals.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Not Applicable.** The Proposed Project is a residential project and would not implement employer-based transportation telecommunications programs. Nonetheless, the Project would not interfere with the implementation of such strategies.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans, and ridesharing subsidies.	**Not Applicable.** The Proposed Project is a residential project and would not implement employer-based transportation trip reduction programs. Nonetheless, the Project would not interfere with the implementation of such strategies.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Not Applicable.** The Proposed Project is a residential project and would not implement parking management programs. Nonetheless, the Project would not interfere with the implementation of such strategies.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The Proposed Project does not include special events that would require traffic management.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** As discussed in the approved Transportation Impact Analysis for the Proposed Project, completed by Linscott Law & Greenspan Engineers[8], the Proposed Project would minimize traffic impacts below significance thresholds.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The Proposed Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Los Angeles County Metropolitan Transportation Authority, and other regional agencies on the coordination of land use, air quality, and transportation policies.

8 **Transportation Impact Analysis for the Proposed Senior Apartments At 6650 Franklin Avenue,** Linscott Law & Greenspan Engineers, October 20, 2016. Approved by Los Angeles Department of Transportation (LADOT) January 26, 2017, incorporated herein by reference and included as **Appendix G** to this analysis.

Table V-4
Project Consistency with City of Los Angeles
General Plan - Air Quality Element

Strategy	Project Consistency
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The Proposed Project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	**Consistent.** The Proposed Project would be infill development that would provide residents with proximate access to jobs, shopping, and other uses.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Proposed Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority (i.e., Routes 156, 656, 224, and 155) and the Metro Red Line stations at Universal/Studio City 0.8 miles away. In addition, the Proposed Project is providing a total of 75 on-site bicycle parking spaces of which 68 will be reserved for long-term use and seven for short-term use.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The proposed Project's air quality impacts will be analyzed and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit, and congestion management measures for discretionary projects.	**Consistent.** The Proposed Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority (i.e., Routes 237 and 656 on Highland Avenue, 212, 217, 222, and 312 on Hollywood Boulevard) and LADOT DASH Hollywood.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Not Applicable.** This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants.

Table V-4
Project Consistency with City of Los Angeles
General Plan - Air Quality Element

Strategy	Project Consistency
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Not Applicable.** This policy calls for City facilities to reduce solid waste production and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection, and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent.** The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City of Los Angeles' Green Building Code. Specific measures would be incorporated into the Proposed Project to the extent feasible including, but are not limited to electric vehicle charging stations in the parking structure; five (5) percent of total spaces would be designated for low emitting, fuel efficient and carpool/van pool vehicles; and 15 percent of the roof area set aside for future solar panels.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs.
Source: DKA Planning, 2016.	

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact.

Construction

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2016.3.1 model using assumptions from the Project's developer, including the Project's construction schedule of 20 months. **Table V-5, Proposed Construction Schedule** summarizes the proposed construction schedule that was modeled for air quality impacts.

Table V-5
Proposed Construction Schedule

Phase	Duration	Notes
Site Preparation	7/3/18-7/31/18	Shoring activities using drilled solider beam installation
Grading	8/1/18-8/31/18	Up to 10,000 cubic yards of soil export
Building Construction	9/1/18-2/28/20	
Architectural Coatings	12/1/19-2/28/20	
Source: DKA Planning, 2016		

As shown in **Table V-6, Estimated Daily Construction Emissions - Unmitigated** the construction of the Proposed Project will produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Proposed Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

Table V-6
Estimated Daily Construction Emissions - Unmitigated

Construction Phase Year	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM10	PM2.5
2018	3	33	18	<1	3	4
2019	7	21	20	<1	2	1
2020	6	19	19	<1	2	1
Maximum Regional Total	6	33	20	<1	7	4
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	3	22	14	<1	3	2
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	N/A	No	No	N/A	No	No
Source: DKA Planning, 2016 based on CalEEMod 2016.3.1 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.						

In terms of local air quality, the Proposed Project would produce significant emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. Similarly, construction activities would not produce PM10 and PM2.5 emissions that exceed localized thresholds recommended by the SCAQMD. This assessment assumes enforcement of **Regulatory Compliance**

Measure AQ-RCM-1, which addresses fugitive dust emissions of PM10 and PM2.5 that would be regulated by SCAQMD Rule 403. This rule calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. As a result, construction impacts on localized air quality are considered less than significant.

However, the close proximity of the Canyon Co-Op School and Las Palmas Senior Citizen Center at 1820 North Las Palmas Avenue 20 feet west of the Project Site could result in nuisance complaints during the construction process. As such, Project Design Features (PDFs) **AQ-PDF-1** through **AQ-PDF-4** will be implemented as part of the Project Construction Management Plan (CMP) which will be employed voluntarily to pre-empt any sensitivities to construction emissions.

Operation

The Project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project site. The Project could add up to 234 net vehicle trips to and from the Project Site on a peak weekday at the start of operations in 2020.[9] Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NOX, CO, PM10 and PM2.5 emissions (**Table V-7, Estimated Daily Operations Emissions - Unmitigated**). As a result, the Project's operational impacts on regional air quality are considered less than significant.

Table V-7
Estimated Daily Operations Emissions - Unmitigated

Emission Source	Pounds per Day					
	VOC	NOX	CO	SOX	PM10	PM2.5
Area Sources	1	<1	6	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	2	7	<1	2	<1
Net Regional Total	**1**	**3**	**13**	**<1**	**2**	**1**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	**1**	**<1**	**6**	**<1**	**<1**	**<1**
Localized Significance Threshold	**-**	**80**	**498**	**-**	**2**	**1**
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning 2016 based on CalEEMod 2016.3.1 model runs. LST analysis based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.

9 Linscott Law & Greenspan, "Technical Memorandum-Montecito Senior Housing Project", October 2016.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

Less Than Significant Impact.

Construction

A project's construction impacts could be considered cumulative considerable if it substantially contributes to cumulative air quality violations when considering other projects that may undertake concurrent construction activities.

Construction of the Proposed Project would not contribute significantly to cumulative emissions of any non-attainment regional pollutants. For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. Similarly, regional emissions of PM10 and PM2.5 would not exceed mass thresholds established by the SCAQMD. Therefore, construction emissions impacts on regional criteria pollutant emissions would be considered less than significant.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. Construction of the Project itself would not produce cumulative considerable emissions of localized nonattainment pollutants PM10 and PM2.5, as the anticipated emissions would not exceed LST thresholds set by the SCAQMD. This is considered a less than significant impact.

If any other proposed projects were to undertake construction concurrently with the proposed Project, localized CO, PM2.5, PM10, and NO2 concentrations would be further increased. However, the application of LST thresholds to each cumulative project in the local area would help ensure that each project does not produce localized hotspots of CO, PM2.5, PM10, and NO2. Any projects that would exceed LST thresholds (after mitigation) would perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM10 and PM2.5 that generally double with every doubling of distance.

Operation

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in **Table V-7,** the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The Project is a residential development that would not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM10 and PM2.5 would be minimal. Likewise, existing land uses in the area include land uses that do not produce substantial emissions of localized nonattainment pollutants.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Construction

Construction of the Proposed Project could produce air emissions that impact several existing sensitive receptors near the Project Site, including:

- Montecito Apartments, 6650 Franklin Avenue, directly adjacent on-site.
- Canyon Co-Op School, 1820 North Las Palmas Avenue, 20 feet west of the Project Site
- Las Palmas Senior Citizen Center, 1820 North Las Palmas Avenue, 20 feet west of the Project Site
- Multi-family residences, 1847 North Cherokee Avenue; 5 feet south of the Project site
- Chateau Des Fleurs Apartments, 6626 Franklin Avenue; 185 feet east of the Project Site
- Multi-family residences, 6643 Franklin Avenue; 80 feet north of the Project Site
- Yucca Park, 6671 Yucca Street, 450 feet south of the Project Site.

As illustrated in **Table V-7,** these nearby receptors would not be exposed to substantial concentrations of localized pollutants CO, NO2, PM10, and PM2.5 from construction of the proposed Project. Specifically, construction activities would not exceed SCAQMD LST thresholds for CO, NO2, PM10, and PM2.5 and represent a less than significant impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard.

Operation

The Proposed Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO2, PM2.5, or PM10 at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.[10] Specifically, traffic levels of service at three intersections studied in the vicinity of the Project would not be significantly impacted by traffic volumes from the development under existing or 2019 horizon scenarios.[11]

Finally, the Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.[12] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[13] The Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, Project impacts related to TACs would be less than significant.

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10 Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.

11 Linscott Law & Greenspan, "Technical Memorandum-Montecito Senior Housing Project", October 2016.

12 California Office of Environmental Health Hazard Assessment. *Health Effects of Diesel Exhaust*. www. http://oehha.ca.gov/public_info/facts/dieselfacts.html

13 SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Potential sources that may emit odors during the construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Site. Development of the Proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites. Additionally, the odors would be temporary, and construction activity would be required to comply with SCAQMD Rule 402.[14] A less than significant impact relative to an odor nuisance would occur during construction associated with the Proposed Project.

According to the SCAQMD *California Environmental Quality Act (CEQA) Air Quality Handbook*, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[15] The Proposed Project would not include any of these odor-producing uses; odors associated with project operation would be limited to on-site waste generation and disposal and occasional minor odors generated during food preparation activities for the residents. Furthermore, all trash receptacles would be covered and properly maintained in a manner as to minimize odors, as required by City and Los Angeles County Health Department regulations, and be emptied on a regular basis. Therefore, the implementations of the Proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant.

Project Design Features

The following optional Project Design Features will be implemented to ensure construction impacts related to air quality are further reduced.

AQ-PDF-1 The Project Applicant shall ensure that construction vehicles avoid, to the extent feasible, travel on Las Palmas Avenue adjacent to the Canyon Co-Op School and Las Palmas Senior Citizen Center.

AQ-PDF-2 The Project Applicant shall provide advance notification to the Canyon Co-Op School and Las Palmas Senior Citizen Center of the Project's anticipated general

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[14] *SCAQMD Rule 402 states the following "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.*

[15] *South Coast Air Quality Management District, CEQA Air Quality Handbook; http://www.aqmd.gov/ceqa/hdbk.html, December 06, 2016.*

construction schedule and a specific schedule for site grading and preparation activities. Any earth moving activities shall be scheduled to avoid or minimize overlap with school activities, particularly outdoor play periods.

AQ-PDF-3 The Project Applicant shall coordinate with administrative staff at Canyon Co-Op School and Las Palmas Senior Citizen Center to seal any building leaks adjacent to the construction site.

AQ-PDF-4 The Project Applicant shall provide dense windscreens on chain link fences and gates at Canyon Co-Op School and Las Palmas Senior Citizen Center facing the Project Site to reduce dispersion of any dust plumes from earth moving activities.

Regulatory Compliance Measures

AQ-RCM-1 Construction activities shall comply with SCAQMD Rule 403, including the following measures:

- Apply water to disturbed areas of the site three times a day
- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
- Limit soil disturbance to the amounts analyzed in this air quality analysis.
- All materials transported off-site shall be securely covered.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

AQ-RCM-2 Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.

4. BIOLOGICAL RESOURCES

Would the project:

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

No Impact. The Project Site is currently developed with a surface parking lot and an open courtyard, located in an urban portion of the City and is not located near any vacant land with natural vegetation supportive of sensitive species.[16] Therefore, no special status/sensitive species are expected to occur on the Project Site. Because of the nature of the urbanized Project Site and project vicinity, redevelopment of the Project Site would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. No impacts would occur, and no further analysis is required.

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

No Impact. The site is currently developed with a surface parking lot and an open courtyard, located in an urban area. No riparian habitat or other sensitive natural community exists within the project area or in the surrounding area.[17] Implementation of the Proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service. Therefore, no impacts would occur, and no further analysis is required.

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16 *City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed December 11, 2015, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf, accessed April 25, 2016.*

17 *City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed December 11, 2015, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf, accessed April 25, 2016.*

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The site is currently developed with a surface parking lot and an open courtyard and located in an urban area. There are no wetlands within the project area or in the surrounding area.[18] Buildout of the Proposed Project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, no impacts would occur, and no further analysis is required.

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

Less Than Significant Impact. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area. However, a number of mature trees are scattered along the parkways and within the Project Site. Although the trees are all ornamental and nonnative, they may provide suitable habitat, including nesting habitat, for migratory birds. A tree survey report was conducted by Tree Case Management in May 2017. Of the 27 identified trees on the Project site, 22 would be removed, with the remaining five trees either preserved in place, or removed, depending on construction methods. The tree survey found there are no protected species trees as defined under the Los Angeles Municipal Code Ordinance 177404. No trees to be removed are within the public right-of-way.

The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. The City requires that all projects comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. The Proposed

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18 *US Fish and Wildlife Service, National Wetlands Inventory, http://www.fws.gov/wetlands/Data/Mapper.html, accessed December 11, 2015, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf, accessed April 25, 2016.*

Project will be required to comply with the provisions of the MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found. With adherence to the MBTA requirements, less than significant impacts would occur and no further analysis is required.

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

Less Than Significant Impact. The City's Protected Tree Ordinance No. 177,404 (Chapter IV, Article 6 of the Los Angeles Municipal Code), defines protected trees as:

> Any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree*:*
>
> *Oak trees including Valley Oak (Quercus lobata) and California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa),*
>
> *Southern California Black Walnut (Juglans californica* var*. californica),*
>
> *Western Sycamore (Platanus racemosa), and*
>
> *California Bay (Umbellularia californica).*

As previously discussed, there are 27 trees within the public right-of-way and on the Project Site. All of these trees are of common ornamental species; none of the trees is of a protected species as defined above.[19] Project construction proposes to remove all of these existing trees, five of which would be relocated on the Project Site. Further, it is the City's Street Tree policies to require the replacement any street trees removed during project construction. Specifically, the City's policy is to replace all significant, non-protected trees (defined as eight inches (8") in diameter at breast height (DBH)) at a 1:1 ratio with a minimum 24-inch box size tree. In addition, per the City's Street Tree Policies, the City Department of Public Works, Urban Forestry Division's policy is to replace street trees removed during a construction project. Therefore, prior to the issuance of a grading permit, during plan check review, in compliance with the LAMC and policies, a landscape plan shall be submitted for approval by the Department of City Planning and the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. The landscape plan shall demonstrate the minimum replacement ratio

[19] ***Tree Case Management Tree Report, dated May 17, 2017*** *and included as* ***Appendix B*** *to this SCEA.*

of 1:1 for the existing, significant street trees and meet the requirements of the City of Los Angeles Landscape Ordinance No. 170,978. Further, removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. A Tree Removal Permit and a subsequent Tree Planting Permit would be required prior to the issuance of a Certificate of Occupancy, to certify that all new trees in the public right-of-way are provided per the current standards of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Following the implementation of the City's standard policies and procedures, impacts would be less than significant and no further analysis is required.

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

No Impact. The site is located in a developed urbanized area and does not provide habitat for sensitive Biological resources. There are no SEAs within the vicinity of the Project Site.[20] Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Proposed Project. Therefore, implementation of the Proposed Project would not conflict with the provisions of an adopted habitat conservation plan. No impacts would occur, and no further analysis is required.

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[20] *City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed September 8, 2017, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf, accessed September 8, 2017.*

5. CULTURAL RESOURCES

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less Than Significant Impact with Mitigation. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[21] Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

The following analysis is based on the *Montecito II Historic Resources Technical Report* (Historic Resources Report), prepared by Historic Resources Group, dated July 2017, incorporated herein by reference and included as **Appendix C** to this SCEA.

SITE DEVELOPMENT HISTORY

Existing Conditions

The Project Site is located on the southwest corner of Franklin Avenue and N. Cherokee Avenue in Hollywood. The hillside site slopes down to the south and west. The Project Site contains a ten-story, reinforced concrete apartment building located on the northeast portion of the Project Site. Known as the "Montecito Apartments" since its original construction in 1931, the building was listed in the National Register of Historic Places in 1985.

A landscaped garden area sits directly west of the Montecito Apartments building providing private park space for the residents. The garden is surrounded by a metal

[21] *California Public Resources Code Section 21084.1*

fence covered in climbing vines. Gated access from the garden opens onto Franklin Avenue.

A rectangular surface parking lot occupies the southern portion of the Project Site flanking the Montecito Apartments building and adjacent garden. The parking lot is accessed by a gated drive off N. Cherokee Avenue.

The area immediately surrounding the Project Site is largely residential and characterized by multi-family residential buildings dating from the 1920s to the present day.

The Las Palmas Senior Center is located on a large parcel west of the Project Site. The Senior Center property contains the Canyon Co-op Pre-School.

Commercial development in the area is concentrated on Highland Avenue to the west and Hollywood Boulevard to the south.

Site Development

The Project Site and immediate surrounding area was originally subdivided as the "Hollywood Ocean View Tract" in 1901. Hollywood incorporated as a city in 1903 and in 1904 a streetcar line was established between Hollywood and Downtown Los Angeles. The city of Hollywood was consolidated with Los Angeles in 1910.

Skyrocketing population growth in the Los Angeles region, along with the success of the motion picture industry then concentrated in and around Hollywood, spurred continuous development in Hollywood over the next two decades. A 1919 Sanborn map shows that the Project Site and surrounding area had by that time been largely developed as a low-density residential area characterized by single-family homes. The current location of the Montecito Apartments building was occupied by a single-family home (1861 Cherokee). The location of the current garden west and adjacent to the Montecito Apartments was in 1919 developed with two single-family homes (6674 and 6672 Franklin Avenue) and a duplex (6668 and 6668-1/2 Franklin Avenue). The site of the current surface parking lot south of the Montecito Apartments and adjacent garden was undeveloped in 1919 but would soon be developed with a single-family home as well (1855 Cherokee).

During the 1920s, Hollywood dramatically increased in density to meet burgeoning demand for housing. Bungalow courts, duplexes, and multistory apartment buildings replaced many of the single-family homes that had originally characterized the area. In

the latter half of the 1920s, luxury apartment buildings rising four stories and higher were constructed. Many of these operated as "apartment hotels" offering fully furnished suites, laundry, housekeeping, and in some cases food service. These properties catered to a more transient population in need of temporary housing and proved to be a useful option for creative talent imported west for work in the film industry.

In 1930, the single-family residence at 1861 Cherokee Avenue was demolished. The Montecito Apartments were constructed in its place in 1931. The building was constructed with two levels of integrated subterranean parking; a portion of the parking area was converted for use as a residence commissary in 1934.

In 1953 the single-family home at 1855 Cherokee Avenue, located directly south of the Montecito Apartments, was relocated. The vacant parcel was paved and used as surface parking for the Montecito Apartments. In 1956 a "semi-public" swimming pool was constructed on the western half of the 1855 Cherokee parcel.

In 1960, the Las Palmas Senior Center was developed at the southeast corner of Franklin and Las Palmas avenues. The residential duplex at 6668 Franklin Avenue (west of the Montecito Apartments) was demolished in 1962. Permits for the demolition or relocation of the other two residential buildings located west of the Montecito Apartments were not located for this study, but according to Sanborn maps, both were removed between 1955 and 1966. The area left vacant by the removal of the residential buildings was paved and used for surface parking.

The Montecito Apartments successfully operated as a popular apartment hotel over several decades and proved to be particularly popular with actors. James Cagney, Mickey Rooney, Ronald Regan, Julie Harris, Montgomery Clift, George C. Scott, Lee Grant, and Gene Hackman all made the Montecito Apartments their home at one time. Former manager Gene Hinson was quoted as saying that actors liked the Montecito for the homey atmosphere the staff provided but also because, "we gave them credit."

Like much of Hollywood, the Montecito Apartments went into decline during the 1970s. It was listed in the National Register of Historic Places in 1985 and rehabilitated as affordable senior housing that same year. The parking lot to the immediate west of the building was most likely converted to a garden space during or soon after the 1985 conversion. The swimming pool, constructed in 1956, is no longer extant and it is not clear exactly when the swimming pool was removed. The pool was mentioned as extant in the 1985 National Register nomination but "unmaintained" and "in poor condition." No demolition permit for the pool was located for this study but aerial photographs

indicate that it had been removed by the mid-1990s. Removal of the pool likely happened at the same time as the building's conversion to low-income housing.

REGULATORY REVIEW

Historic Resources under CEQA

CEQA requires that environmental protection be given significant consideration in the decision making process. Historic resources are included under environmental protection. Thus, any project or action which may cause a substantial adverse change in the significance of an historic resource is a project that also has a significant effect on the environment.

When the California Register of Historical Resources was established in 1992, the Legislature amended CEQA to clarify which historic resources may be significant, as well as which project impacts are considered to cause a substantial adverse change in the significance of an historic resource. A "substantial adverse change" means "demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

CEQA includes in its definition of historic resources a resource listed in, or determined eligible for listing, in the California Register of Historical Resources. All properties on the California Register are to be considered under CEQA. However, because a property does not appear on the California Register does not mean it is not significant and therefore exempt from CEQA consideration. All resources determined eligible for the California Register are also to be considered under CEQA.

The CEQA statute provides that an historic resource is a resource that is:

- Listed in the California Register of Historical Resources (California Register);
- Determined eligible for the California Register by the State Historical Resources Commission; or
- Included in a local register of historic resources.

The appellate court has affirmed the three categories of historic resources:

- ***Mandatory historical resources*** are resources "listed in, or determined to be eligible for listing in, the California Register of Historical Resources."

- ***Presumptive historical resources*** are resources "included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1" of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.

- ***Discretionary historical resources*** are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.

Section 15064.5 of the CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3) supplements the statute by providing two additional definitions of historical resources, which may be simplified in the following manner. An historic resource is a resource that is:

- Identified as significant in an historical resource survey meeting the requirements of Public Resources Code 5024.1 (g);

- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, this category includes resources that meet the criteria for listing on the California Register (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historic resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, does not preclude a lead agency from determining that the resource may be an "historic resource" for purposes of CEQA.

Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register. Properties designated by local municipalities can also be considered historic resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

Historic Designations

A property may be designated as historic by National, State, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must

also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

National Register of Historic Places

The National Register of Historic Places is an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment. The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of an historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive Federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

B. That are associated with the lives of persons significant in our past; or

C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. That have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting any or all of the criteria listed above, properties nominated must also possess integrity of location, design, setting, materials, workmanship, feeling, and association.

California Register of Historical Resources

The California Register is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State's historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.

The criteria for eligibility for listing in the California Register are based upon National Register criteria. These criteria are:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.

2. Associated with the lives of persons important to local, California, or national history.

3. Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values.

4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

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

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places.

- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California

Register in accordance with procedures to be adopted by the State Historical Resources Commission (commission).

- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.

Other resources which may be nominated for listing in the California Register include:

- Individual historic resources.
- Historic resources contributing to the significance of an historic district.
- Historic resources identified as significant in historic resources surveys, if the survey meets the criteria listed in subdivision (g).
- Historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.
- Local landmarks or historic properties designated under any municipal or county ordinance.

Local Designation Programs

The Los Angeles City Council designates Historic-Cultural Monuments on recommendation of the City's Cultural Heritage Commission.

Chapter 9, Section 22.171.7 of the City of Los Angeles Administrative Code defines an historical or cultural monument as:

> "… a Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or

> method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age."

Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for Historic-Cultural Monument status. Buildings may be eligible for historical cultural monument status if they retain their historic design and materials. Those that are intact examples of past architectural styles or that have historical associations may meet the criteria in the Cultural Heritage ordinance.

Hollywood Community Plan

The Project Site is located within the planning boundary of the Hollywood Community Plan, adopted in December 1988. The Hollywood Community Plan is one of thirty-five Community Plans that comprise the Land Use Element of the City of Los Angeles' General Plan. The General Plan is the City's fundamental policy document, directing the City's future growth and development.

The 1988 Hollywood Community Plan does not specifically address historic resources; however, a stated objective of the 1988 Plan is to "encourage the protection and enhancement of the varied and distinctive residential character of the Community…" In addition, Housing Policy in the 1988 Plan version "encourages the protection and enhancement of well-defined residential neighborhoods in Hollywood through (1) application of Historic Preservation Overlay Zones where appropriate, and/or (2) preparation of neighborhood preservation plans which further refine and tailor development standards to neighborhood character."

The Plan also reiterates that it is "the City's policy that the Hollywood Community Plan incorporate the sites designated on the Cultural and Historical Monuments Element of the General Plan."

Hollywood Redevelopment Project

The Project Site is contained within the Hollywood Redevelopment Project area generally bounded by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The Hollywood Project area was established in 1984 by the Community Redevelopment Agency (CRA). The CRA was dissolved on February 6, 2012, and administration of the Hollywood Redevelopment Project area has been transferred to the CRA/LA, a

Designated Local Authority (DLA) and successor to the CRA, and may transfer to the City Planning Department.

The Hollywood Redevelopment Project's goals include "the retention, restoration and appropriate reuse of existing buildings, groupings of buildings, and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria." Policies and guidelines for the preservation, rehabilitation, and retention of historic properties are discussed in Section 5.11 of the Redevelopment Plan.

As part of its responsibilities in implementing the Hollywood Redevelopment Plan, the CRA compiled historic survey data on properties within the Hollywood Redevelopment Project Area. Property evaluations from historic surveys in 1986, 1997, and 2003 were compiled in a data table that was made available on the CRA website. A more recent intensive-level survey of the Hollywood Redevelopment Project Area was conducted in 2010. It provides relevant information regarding the status of properties within the redevelopment area and is used by agencies and the community to identity potential historic resources. The results of this survey have been compiled in a data table that includes information previously listed in the CRA data table.

Historic Significance and Integrity

Historic Significance

The definition of historic significance used by the California Office of Historic Preservation (OHP) in its administration of the California Register is based upon the definition used by the National Park Service for the National Register.

Historic significance is defined as the importance of a property to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation. It is achieved in several ways:

- Association with important events, activities or patterns,
- Association with important persons,
- Distinctive physical characteristics of design, construction, or form, or
- Potential to yield important information.

A property may be significant individually or as part of a grouping of properties.

Historic Integrity

Historic integrity is the ability of a property to convey its significance and is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period." The National Park Service defines seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- ***Location*** is the place where the historic property was constructed or the place where the historic event took place.
- ***Design*** is the combination of elements that create the form, plan, space, structure, and style of a property.
- ***Setting*** is the physical environment of a historic property.
- ***Materials*** are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- ***Workmanship*** is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- ***Feeling*** is a property's expression of the aesthetic or historic sense of a particular period of time.
- ***Association*** is the direct link between an important historic event or person and a historic property.

Age Threshold

The fifty-year age threshold has become standard in historic preservation as a way to delineate potential historic resources. The National Park Service, which provides guidance for the practice of historic preservation, has established that a resource fifty years of age or older may be considered for listing on the National Register of Historic Places.

In the City of Los Angeles there is no requirement that a resource be a certain age before it can be designated as a Los Angeles Historic-Cultural Monument. The City's Office of Historic Resources does qualify, however that "enough time needs to have passed since

the resource's completion to provide sufficient perspective that would allow an evaluation of its significance within a historical context."

IDENTIFICATION OF HISTORICAL RESOURCES

The Project Site contains one building that has been designated as a historic resource. No other historic resources are located on the Project Site.

The Montecito Apartments - 6650 Franklin Avenue

The Montecito Apartments, located at 6650 Franklin Avenue, was listed in the National Register of Historic Places in 1985. Because the Montecito Apartments has been listed in the National Register, it is also listed in the California Register of Historical Resources. By virtue of its listing in the National Register and California Register, the Montecito Apartments is considered a historical resource for the purposes of CEQA.[22]

Architectural Description

The Montecito Apartments is a ten story, reinforced concrete building with a two-level basement. The building is square in plan with two shallow light courts on the east and west facades and designed in an Art Deco style with Zig-Zag Moderne and Mayan influences.

The building's primary (northern) facade faces Franklin Avenue. The recessed main entrance is distinguished by a double inset bronze doorway with a decorative cast iron, rusticated concrete and marble and black glass surround. A highly decorated cast iron canopy with lamps is sits directly above the main entrance. Neon letters spelling "MONTECITO" adorn the north, east and west faces of the canopy.

The Franklin Street façade is characterized by a symmetrical and relatively austere arrangement of rusticated concrete panels set between vertical piers and metal-frame casement windows. Details include decorative cast spandrel panels and cast concrete Mayan pendants.

The east-facing façade continues the decorative detailing of the north facade. The eastern façade also features a centrally located light well flanked by four window bays on each side. The south elevation is similar to the north but dispenses with the decorative Mayan

22 A copy of the National Register Nomination for the Montecito Apartments is included in the Montecito II Historic Resources Technical Report, included as Appendix C to this SCEA.

detailing after the easternmost window bay. Due to the downward slope of the site, the two basement levels are fully exposed on this façade.

The west elevation includes a central light well similar to that of the east elevation. In this case there are only three window bays located in the principal wall segments. Fenestration is metal-frame casement throughout.

A neon roof sign spelling "MONTECITO" is located on the south-facing roof parapet. A centrally located mechanical penthouse of concrete construction tops the building. The penthouse is rectangular in plan with a hipped standing seam copper roof. There are four window openings on the east and west elevations and two window bays on the north and south.

Decorative cast panels are located above the window openings on all facades. A neon "MONTECITO" sign, similar to that on the south parapet, is located on the east façade of the machinery penthouse directly below the roofline.

Art Deco Architecture

The Montecito Apartments was designed an Art Deco style incorporating Zig-Zag Moderne and Mayan influences. Art Deco originated in France in the 1910s as an experimental movement in architecture and the decorative arts. It developed into a major style when it was first exhibited in Paris at the 1925 *Exposition Internationale des Arts Decoratifs et Industriels Modernes*, from which it takes its name. The Exposition's organizers had insisted on the creation of a new, contemporary aesthetic that dispensed with traditional historicist styles and responded more directly with the industrial and technical innovations of the 20th century. The architecture of the Art Deco movement rejected the rigid organizational methods and classical ornamentation of the Beaux Arts style. It emphasized a soaring verticality through the use of stepped towers, spires, and fluted or reeded piers, and embraced highly stylized geometric, floral, and figurative motifs as decorative elements on both the exterior and interior. Decorative motifs often referenced ancient Egyptian, Asian, or Pre-Columbian origins considered "exotic" to a western audience. Abstracted, purely geometric decoration was also often used. Ornate metalwork, glazed terra cotta tiles, and bright colors were hallmarks of the style.

Character-defining features include an emphasis on vertical lines; smooth wall surfaces, usually of plaster; flat roofs with decorative parapets or towers; stylized decorative floral and figurative elements in cast stone, glazed terra cotta tiles, or aluminum; metal-frame

windows, usually fixed or casement; and geometric decorative motifs such as zigzags and chevrons.

Art Deco was the first popular style in the United States that consciously rejected historical precedents. It was instead a product of the Machine Age and took its inspiration from industry and transportation. It was only briefly popular, from the late 1920s until the late 1930s, and was employed primarily in commercial and institutional buildings, and occasionally in multifamily residential buildings. It was rarely used for single-family residences. By the mid-1930s, in the depths of the Great Depression, the highly-decorated style came to be viewed as garish and overwrought, and it was soon abandoned in favor of the cleaner, simpler Streamline Moderne style.

Significance

The Montecito Apartments is significant under National Register Criterion C and California Register Criterion 3 as an excellent example of Art Deco architecture as applied to an apartment building; and as an excellent example of the apartment hotel property type from the pre-World War II era in Hollywood. It maintains an unusually high level of physical integrity among similar buildings from the same period.

Constructed in 1931, the Montecito Apartments was designed by noted Los Angeles architect Marcus P. Miller. Other buildings designed by Miller include the Streamline Moderne Chandler's Shoe Store at the northwest corner of Wilshire Boulevard and Cloverdale Avenue; and the programmatic Darkroom Camera Shop storefront at 5370 Wilshire Boulevard. Construction was provided by the H.M. Baruch Corporation, one of Los Angeles' most prominent builders in the late 1920's and early 1930's.

The Montecito Apartments had a long history of providing temporary housing in Hollywood and was particularly popular with artists and craftspeople associated with the motion picture industry. The building's distinctive design and illuminated roof-top signage have been a prominent component of the Hollywood skyline since its construction.

POTENTIAL IMPACTS

Significance Threshold

The City of Los Angeles CEQA Thresholds Guide (2006, p. D.3-2) states that a project would normally have a significant impact on historic resources if it would result in a

substantial adverse change in the significance of a historic resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

In addition to this guidance provided by the City of Los Angeles, the State Legislature, in enacting the California Register, also amended CEQA to clarify which properties are significant, as well as which project impacts are considered to be significantly adverse.

A project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

The Guidelines go on to state that "[t]he significance of an historic resource is materially impaired when a project… [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources… local register of historic resources… or its identification in a historic resources survey."

Additional Guidance

<u>Secretary of the Interior's Standards</u>

The Secretary of the Interior's Standards for the Treatment of Historic Properties (the "Standards") provide guidance for reviewing proposed projects that may affect historic resources.

The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation, rehabilitation, and maintenance of historic materials and features. The Standards pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and interior of the buildings. The Standards also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction.

From a practical perspective, the Standards have guided agencies in carrying out their historic preservation responsibilities including State and local officials when reviewing projects that may impact historic resources. The Standards have also been adopted by state and local jurisdictions across the country.

In addition, the Standards are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. However, these Guidelines and Regulations are not part of the CEQA process. CEQA requires analysis of physical impacts to the environment and the only relationship of the Secretary of the Interior Standards to the CEQA process are discussed under CEQA Guidelines Section 15064.5(b)(3):

"Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource."

The statutory language above references the Secretary of the Interior's Standards and Guidelines for four distinct historic "treatments," including: (1) preservation; (2) rehabilitation; (3) restoration; and (4) reconstruction. The specific standards and guidelines associated with each of these possible treatments are provided on the National Park Service's website regarding the treatment of historic resources.

For analytical purposes, a threshold decision must be made regarding which "treatment" standards should be used to analyze a project's potential effect on historic resources. "Preservation" refers to the straightforward stabilization and maintenance of a historic property. "Restoration" addresses the return of a property to a specific time period and includes reconstruction of features missing from that time period. "Reconstruction" addresses the depiction of a no longer extant historic property through new construction.

The use of the Secretary of the Interior's "rehabilitation" standards (the Rehabilitation Standards) addresses the most prevalent and widely used treatment. "Rehabilitation" is defined as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values." "Rehabilitation" recognizes necessary alteration for contemporary use and therefore provides a more appropriate impact analysis than the other treatment standards, and accounts for the fact that the adjacent properties will likely require some form of protection during construction activities and ongoing maintenance over the term of the construction.

Rehabilitation Standards

The National Park Service encourages maintaining the integrity of a historic resource through the appropriate design of infill buildings at sites adjacent to historic resources. The Standards are intended as general guidance for work on any historic building. The Rehabilitation Standards expand the discussion to sites and neighborhoods.

As written in the Rehabilitation Standards, there is a distinction, but not a fundamental difference, between the concerns for additions to historic buildings and new construction, or "infill" adjacent to historic buildings on a property or within a historic district. As with most matters of design and planning, the differences are defined by the scale, site, setting, and project.

National Park Service: Preservation Brief 14

In addition to the Standards and Guidelines for Rehabilitation, the National Park Service publishes a series of briefs that includes "Preservation Brief 14, New Exterior Additions to Historic Buildings: Preservation Concerns," as revised and republished in 2010. Among the concepts presented are a balance between differentiation and compatibility, and subordination of the new to the old.

Preservation Brief 14 states:

1. There is no formula or prescription for designing a new addition that meets the Standards. A new addition to a historic building that meets the Standards can be any architectural style -- traditional, contemporary or a simplified version of the historic building. However, there must be a balance between differentiation and compatibility in order to maintain the historic character and the identity of the

building being enlarged. New additions that too closely resemble the historic building or are in extreme contrast to it fall short of this balance. Inherent in all of the guidance is the concept that an addition needs to be subordinate to the historic building.

2. The intent of the Preservation Briefs is to provide guidance to owners, architects, and developers on how to design a compatible new addition…. A new addition to a historic building should preserve the building's historic character. To accomplish this and meet the Secretary of the Interior's Standards for Rehabilitation, a new addition should:

   - Preserve significant historic materials, features and form;
   - Be compatible; and
   - Be differentiated from the historic building.

Impact Analysis Using Los Angeles CEQA Thresholds

The following analysis uses the thresholds provided in the City of Los Angeles CEQA Thresholds Guide.

1. Would the Project involve the demolition of a significant resource?

The Project will not demolish any historically significant resource. The Project will require demolition of the garden space located west of the Montecito Apartments building. The Project will also require demolition of the western portion of the surface parking lot located immediately south of the Montecito Apartments building for use as a landscaped patio space. Both the garden space and the parking lot were separate parcels containing residential buildings when the Montecito Apartments was originally constructed in 1931. This condition continued until at least 1953 when the residential building located on the parcel immediately south of the Montecito Apartments (1855 Cherokee) was relocated and the parcel was incorporated for use by the Montecito Apartments soon after. The three residential buildings located on the parcels immediately west of the Montecito Apartments were removed by the mid-1960s and those parcels were also paved for use as surface parking for the Montecito Apartments.

Neither the southern parcel nor the western parcels were part of the Montecito Apartments property during the first two decades of its existence and are not considered character-defining features of the Montecito Apartments. Moreover, both areas have

been substantially altered since their incorporation with the Montecito Apartments property. A swimming pool was constructed on the western portion of the southern parking lot in 1956 and was subsequently removed during or soon after the 1985 conversion of the Montecito Apartments for affordable senior housing. The western parking lot was converted as a garden space during or soon after the 1985 conversion.

No other buildings, structures, objects, or sites – located on the Project Site or in its vicinity – will be demolished for the Project. The Project will not involve demolition of a significant resource.

2. Would the Project involve relocation that does not maintain the integrity of a significant resource?

No buildings, structures, objects, or sites will be relocated for the purposes of the Project. Therefore, the Project does not involve the relocation of any historically significant resources.

3. Would the Project involve conversion, rehabilitation or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings?

The Project will construct a new residential building immediately west of the Montecito Apartments building on a portion of the Project Site currently used as a landscaped garden space. A one-story hyphen[23] would connect the proposed new building to the Montecito Apartments building on the first floor. Preservation Brief 14 states that a successful way to reduce material loss when attaching a new exterior addition "is to link the addition to the historic building by means of a hyphen or connector. A connector provides a physical link while visually separating the old and new, and the connecting passageway penetrates and removes only a small portion of the historic wall."

The hyphen connection of the proposed new building to the Montecito Apartments would require the removal of a small portion of historic fabric from the west-facing façade of the Montecito Apartments. Removal of historic fabric from its west facing façade would not result in a substantial loss of integrity to the Montecito Apartments because it would alter only a small portion of west-facing façade and the majority of the original fabric and character-defining features of the Montecito Apartments, including all of the existing original fabric and character-defining features of the north, east, and

23 In this context a 'hyphen' is a connecting link between two larger building elements.

south facades, will remain intact. With mitigation to ensure that the proposed connection is executed with minimal impact to the important character-defining features of the Montecito Apartments building, alteration by the proposed Project would not result in a significant impact to the Montecito Apartments.

4. Would the Project involve construction that reduces the integrity or significance of important resources on the site or in the vicinity?

The Project will construct a new residential building immediately west of the Montecito Apartments building on a portion of the Project Site currently used as a landscaped garden space. The new building will be six stories in height with two subterranean parking levels.

The proposed Project will insert a new building in an area currently used as landscaped garden space. In order for this alteration to be considered a substantial adverse change, however, it must be shown that the integrity and/or significance of the Montecito Apartments would be materially impaired by the proposed adjacent new construction.

New construction that is adjacent to or related to an existing historic resource is addressed in Standards 9 and 10 of the of the Secretary of the Interior's Standards for Rehabilitation. Standard 9 states in part: "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." Standard 10 states that "new additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired."

Preservation Brief 14 provides additional guidance, stating that "the first place to consider placing a new addition is in a location where the least amount of historic material and character-defining features will be lost. In most cases, this will be on a secondary side or rear elevation." Preservation Brief 14 goes on to state that "a new addition should always be subordinate to the historic building; it should not compete in size, scale or design with the historic building. An addition that bears no relationship to the proportions and massing of the historic building—in other words, one that overpowers the historic form and changes the scale—will usually compromise the historic character as well."

The proposed new building will be located to the west of the Montecito Apartments, partially obscuring the Montecito Apartment's secondary west-facing façade. The parcels immediately west of the Montecito Apartments building were not originally part of the Montecito Apartments property when the building was originally constructed in 1931. As such, the Montecito Apartments building was designed with the understanding that the parcels to the west might be developed with new construction at a later date. The west-facing façade was left largely devoid of the decorative detail present on the other three facades, and was also designed with fewer windows and a larger light well than the east façade in anticipation of potential new development to the west. Compared to the north-, east- and south-facing facades, the west façade is the least important façade in terms of architectural detail.

The proposed new building will be subordinate to the Montecito Apartments in scale and massing. The new building would be six stories in height, considerably lower than the ten-story Montecito Apartments. It will also be set back over nine feet behind the Montecito Apartment's Franklin Avenue street wall to preserve the dominant profile of the Montecito when viewed from Franklin Avenue.

The design of the new building will also be deferential to that of the Montecito Apartments. The new building will be simple in design, with little of the decorative detail found on the Montecito Apartments. The primary facade will be articulated in a manner that echoes the rhythm of vertical piers and window bays found on the Montecito Apartments with a regular, symmetrical arrangement of windows and balconies.

In accordance with Standard 9, construction of the proposed new residential building would not destroy historic materials or features that characterize the Montecito Apartments property. In accordance with Standard 10, the essential form and integrity of the Montecito Apartments would be unimpaired if the proposed new building were removed in the future. After implementation of the Project, the distinctive form and design of the Montecito Apartments will remain intact and its architectural features will remain viewable and understandable by the public. The proposed new construction also adheres to the important principles identified in Preservation Brief 14, including the preservation of the significant historic materials, features and form of the Montecito Apartments, subordination to the Montecito Apartments and compatibility in design. Construction of the proposed new residential building would not result in a significant impact to the Montecito Apartments.

Finally, the proposed new construction would require substantial foundation work and the construction of subterranean parking. Without mitigation to ensure the protection of historic resources from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil, new construction associated with the Project may result in additional impacts to historic resources.

Summary of Potential Impacts on Historic Resources

Analysis of potential impacts using the Los Angeles CEQA thresholds, the Secretary of the Interior's Standards and National Park Service guidance reveals the following:

1. The Project would construct a new building that connects to the Montecito Apartments building. This connection has the potential to reduce the historic integrity of the Montecito Apartments without mitigation.

2. The Project would require substantial foundation work and the construction of subterranean parking. Without mitigation to ensure the protection of historic resources from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil, new construction associated with the Project may result in additional impacts to adjacent historic resources.

Mitigation Measures

The following mitigation measures would protect historic resources from potential impacts associated with the Project:

CUL-MM-1 The applicant will engage a historic preservation consultant that meets the Secretary of the Interior's Professional Qualifications Standards to ensure that the connection from the proposed new building to the Montecito Apartments is done with a minimum loss of historic fabric in compliance with the Secretary of the Interior's Standards for Rehabilitation. The historic preservation consultant will review drawings and conduct on-site construction monitoring throughout the construction phase.

CUL-MM-2 The Project shall include a shoring plan to ensure the protection of the Montecito Apartments during construction from damage due to

underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil.

Following implementation of Mitigation Measures **CUL-MM-1** and **CUL-MM-2**, potential impacts to historic resources would be less than significant and no further analysis is required.

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

Less Than Significant Impact With Mitigation. Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources which meet the criteria for historical resources, or resources which constitute unique archaeological resources.

The Project Site is located in a highly urbanized area of the City and has been previously disturbed and developed. However, construction of the Proposed Project will include a two level subterranean parking garage that could involve grading and excavation to greater depths than previously undertaken. Project-related grading and excavation activities could disturb unknown archaeological resources buried in site soils. In the event of an unexpected disturbance, significant impacts to archaeological resources could occur.

All development would be subject to the numerous laws and regulations, cited below that require State, and local agencies to consider the effects of a proposed project on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur. Compliance with Mitigation Measure **CUL-MM-3** would reduce impacts to archaeological resources to a less than significant level. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue. The Applicant shall bear the cost of implementing this mitigation measure.

Mitigation Measures

The following mitigation measures would protect archeological resources from potential impacts associated with the Project:

CUL-MM-3 In the event that archaeological resources are uncovered on the Project Site during grading or other construction activities, the Applicant must notify the City of Los Angeles Planning Department immediately and work must stop within a 100-foot radius until a qualified archeologist to be approved by the City, has evaluated the find. Construction activity may continue unimpeded on other portions of the Project Site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code.

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

Less Than Significant Impact With Mitigation. Paleontological resources include fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. Paleontological resources are generally found within sedimentary rock formations.

As discussed above in **Section 5(b),** the Project Site is in a highly urbanized area of the City that has been previously disturbed and developed. However, buildout of the Proposed Project could, specifically the construction of the subterranean parking garage, could involve grading and excavation to greater depths than previously undertaken. Project-related grading and excavation activities could disturb unknown paleontological resources buried in site soils. In the event of an unexpected disturbance, significant impacts to archaeological resources could occur.

All development would be subject to the numerous laws and regulations, cited below that require State, and local agencies to consider the effects of a proposed project on potentially buried paleontological resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. Compliance with Mitigation Measure **CUL-MM-4** would reduce impacts to paleontological resources to a less than significant level. 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 California Public Resources Code Section 21083.2.

Mitigation Measures

The following mitigation measures would protect paleontological resources from potential impacts associated with the Project:

CUL-MM-4 If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if appropriate, salvage. The paleontologist shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report, and a copy of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. There are no known human remains on or near the project area. Additionally, the Project Site is located in a highly urbanized portion of the City. Because the project area has already been previously disturbed and developed, it has been subject to construction and ground-disturbing activities. However, ground-disturbing activities have the potential to disturb previously undiscovered subsurface human remains.

In the event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event that human remain

are discovered, it requires that disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the Native American Heritage Commission (NAHC) by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. Compliance with these protocols would reduce impacts to a less than significant level. No further analysis of this topic is necessary and no mitigation measures are required.

6. GEOLOGY AND SOILS

In 2015, the California Supreme Court in CBIA v. BAAQMD held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The City's revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project physically exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts to future residents or users in the Hollywood Community Plan Area.

The following analysis is based on the following reports and documentation:

- ***Evaluation of Potential Faulting,*** *New Development at Southwest Corner of Cherokee and Franklin, Montecito Apartments 6650 and 6668 Franklin Avenue and 1855 Cherokee N. Cherokee Avenue, Hollywood, CA 90028*, conducted by Feffer Geological Consulting, dated March 23, 2016;

- ***Response to City of LA Correction Letter,*** *Correction Letter Dated May 4, 2016 Log #92628,* conducted by Feffer Geological Consulting, dated September 8, 2016; and

- ***Geology Report Approval Letter,*** City of Los Angeles Department of Building and Safety, dated October 3, 2016.

These documents are incorporated herein by reference and included as **Appendix D** to this SCEA.

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The California Geological

Survey (CGS) designates Alquist-Priolo Earthquake Fault Zones, which are regulatory zones around active faults.

The property is located within an Official Alquist-Priolo Earthquake Fault Zone that was established (November 6, 2014) by the California Geological Survey (CGS) for the Hollywood fault.

The fault investigation by Feffer Geological Consulting (Geology Report) included four test pits (TP-1 to TP-4), eight bucket auger borings (B-1, B-2, BA-1 through BA-6), two continuous core borings (BI and B2), four cone penetration tests (C1 to C4) and three trenches (ST-I , ST-2 and ST-3). The exploration identified artificial fill and several alluvial and colluvial units of various age on the site. Bedrock was identified at the northerly part of the site. Feffer Geological Consulting identified two faults crossing the subject site, which they interpret as inactive.

Regulatory Compliance Measures

The City of Los Angeles Department of Building and Safety (LADBS) has determined that the referenced reports prepared by Feffer Geological Consulting are acceptable, and that the risk of loss, injury, or death involving the rupture of a known earthquake fault would be less than significant, provided the following **Regulatory Compliance Measures** are complied with during site development:

(Note: Numbers in parenthesis () refer to applicable sections of the 2014 City of LA Building Code. P/BC numbers refer the applicable Information Bulletin. Information Bulletins can be accessed on the internet at LADBS.ORG.)

GEO-RCM-1 Prior to issuance of any permit, a geology/soils report shall be submitted to the Grading Division to provide design recommendations for the proposed grading/construction along with an evaluation by the project geologist to confirm that the proposed habitable structures are located within the shadow zone of the fault study exploration.

GEO-RCM-2 During construction, the project engineering geologist shall observe all excavations that expose the natural alluvial soils and bedrock to verify the conclusions of the fault investigation, and confirm that no Holocene faults or ground deformation are exposed. The project engineering geologist shall post a notice on the job site for the City Inspector and the Contractor stating that the

excavation (or portion thereof) has been observed, documented and meets the conditions of the report. No fill or lagging shall be placed until the LADBS Inspector has verified the documentation.

GEO-RCM-3 A supplemental report that summarizes the geologist's observations (including photographs and simple logs of excavations) shall be submitted to the Grading Division of the Department upon completion of the excavations. If evidence of active faulting is observed, the Grading Division shall be notified immediately. (7009)

No further analysis is required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located within seismically active Southern California and therefore could be subject to moderate and possibly strong ground motion due to earthquakes on the Hollywood, Santa Monica, Newport-Inglewood, Malibu Coast, or Anacapa-Dume Faults, as discussed in the Geotechnical Report.

However, this impact will be reduced to a less than significant level by following all relevant California Building Code (CBC) and the City of Los Angeles Uniform Building Code (UBC) seismic standards; as well as the recommendations of the Geology Report, and the conditions contained in the Geology Report Approval Letter, dated October 3, 2016, LOG #92628-01, as required by the City of Los Angeles Department of Building and Safety (LADBS).

Compliance with existing laws regarding the risk of loss, injury, or death, from strong seismic ground shaking would reduce potential impacts to less than significant levels. No further analysis is required.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction potential is greatest

where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of approximately 50 feet or less.

As shown in the Parcel Profile Report prepared by the City of Los Angeles Department of City Planning[24], the Project Site is susceptible to liquefaction and thus may be susceptible to seismic-related ground failure, such as lateral spreading, subsidence, or settlement.

Groundwater was encountered during subsurface exploration at the Project Site at the base of trenches ST-1 and 2 in the northern and central portions of the site and in the northern most BA borings (BA-1, BA-2, and BA-3). Depths to groundwater in the Project Site area step downward over 25 feet to the south. Groundwater was observed at a depth of 20 feet below the ground surface in the northern portion of the site in trench ST-1, and groundwater was observed at a depth of 30 feet below the ground surface in the northern most BA borings (BA-1, BA-2, and BA-3).

The site is located in a designated liquefaction hazard zone as shown on the "Seismic Hazard Zones" map issued by the CGS; however, the potential liquefaction hazard would be addressed during the final construction development phase and design of the building foundations by the structural engineer in concert with the geotechnical engineer. Further, compliance with all relevant CBC and the City of Los Angeles UBC seismic standards, as well as the recommendations of the Geology Report, and the conditions contained in the Geology Report Approval Letter, dated October 3, 2016, LOG #92628-01, as required by the LADBS would ensure that potential impacts would be reduced to less than significant levels. No further analysis is required.

iv) Landslides?

No Impact. Landslides are movements of large masses of rock and/or soil. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The Project Site and surrounding areas are generally flat with gradual changes in elevation, and there are no major slopes or bluffs.

24 *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed April 25, 2016.*

As shown in the Parcel Profile Report prepared by the City of Los Angeles Department of City Planning[25], the Project Site is not located in an area susceptible to landslides. Further, the site is not located within a City-designated landslide area, and thus is not subject to the City's Hillside Ordinance.[26] Therefore, no impacts resulting from landslides would occur and no further analysis is required.

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

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The Project Site is located in a highly urbanized area of the City and is relatively level, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the Project Site. The Proposed Project is a senior housing development with a subterranean parking garage, with landscaped and hardscaped areas, and would not contain large amounts of exposed soil. Following the completion of construction of the Proposed Project, the potential for soil erosion or the loss of topsoil is expected to be extremely low.

Construction of the Proposed Project would involve soil disturbance activities including excavation and grading that would leave soil on the Project Site exposed. Common means of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, the Proposed Project will be subject to local and state codes and requirements for erosion control and grading during construction. Including, but not limited to, grading permits and haul route approval from the LADBS, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, on-site grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills. Further, the Proposed Project will be required to comply with standard regulations, including South Coast Air Quality Management District Rule 402, which will reduce construction erosion impacts.

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25 *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed April 25, 2016.*

26 *City of Los Angeles General Plan, Safety Element, Exhibit C: Landslide Inventory and Hillside Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed April 25, 2016.*

Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, regulates construction activities to minimize water pollution, including sediment. The Proposed Project will be subject to National Pollution Discharge Elimination System permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Construction contractors will be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP, along with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities during grading and construction. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities.

Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the Proposed Project will not occur and soil erosion impacts will be less than significant. No further analysis is required.

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

Less Than Significant Impact. As previously discussed, the Proposed Project site is not in a landslide zone; however, the underlying soils would potentially be subject to liquefaction. The project would comply with all the recommendations of the Geology Report, and the conditions contained in the Geology Report Approval Letter, as required by the LADBS. Additionally, the Proposed Project will be designed and constructed in conformance with the CBC, as well as Los Angeles UBC requirements and other laws designed to protect site occupants from risks related to unstable soil. Compliance with existing laws regarding the risk of loss, injury, or death, from lateral spreading, subsidence, liquefaction or collapse would reduce potential impacts to less than significant levels. No further analysis is required.

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

Less Than Significant Impact. As described above, the Proposed Project would be designed and constructed in conformance with the Los Angles UBC, and would be subject to the requirements of the CBC. Compliance with existing laws, the

recommendations of the Geology Report, and the conditions contained in the Geology Report Approval Letter, as required by the LADBS regarding expansive soils, would reduce potential impacts to less than significant levels. No further analysis is required.

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

No Impact. The Project Site is currently served by the City of Los Angeles wastewater (sewer) system. The Proposed Project would require connection to existing sewers mainlines and service lines, which are currently available in the surrounding roadways. The Proposed Project would not require the use of septic systems. Therefore, no impact would occur and no further analysis is required.

7. GREENHOUSE GAS EMISSIONS

The global nature of climate change creates unique challenges for assessing the Project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of GHG across the globe, a single Project's impact will be negligible. To further complicate this, there is debate about whether a Project's emissions are adding to the net emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world.

Climate change analyses are also unique because emitting carbon dioxide (CO2) into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO2 in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a Project's incremental contribution of CO2 into the atmosphere, it is typically not possible to determine whether or how an individual Project's relatively small incremental contribution might translate into physical effects on the environment.

Pollutants and Effects

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHGs are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

GHGs that contribute to the greenhouse effect include:

- Carbon Dioxide (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO_2 comprises over 80 percent of GHG emissions in California.[27]

27 California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 11.

- Methane (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas, and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.[28]

- Nitrous Oxide (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N_2O emissions.[29] N_2O emissions from motor vehicles generally occur directly from operation of vehicles.

- Hydrofluorocarbons (HFCs) are one of several high global warming potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.

- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.

- Sulfur Hexafluoride (SF_6) is another high GWP gas that is not naturally occurring and is generated in a variety of industrial processes. Emissions of SF_6 are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.[30] To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO2, denoted as CO2e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO2 were being emitted. High GWP gases such as HFCs, PFCs, and SF_6 are the most heat-absorbent.

28 United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003).

29 United States Environmental Protection Agency, U.S. Adipic Acid and Nitric Acid N2O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions, December 2001

30 California Air Resources Board, Climate Change Emission Control Regulations, 2004

Table V-8
Global Warming Potential For Greenhouse Gases

Greenhouse Gas	Global Warming Potential Factor (100-Year)
Carbon Dioxide (CO_2)	1
Methane (CH_4)	28
Nitrous Oxide (N_2O)	265
Perfluorocarbons (PFCs)	7,000-11,000
Hydrofluorocarbons (HFCs)	100-12,000
Sulfur Hexafluoride (SF_6)	23,500

Source: California Air Resources Board, First Update to the Climate Change Scoping Plan. May 2014.
Note: Global warming potential measures how much heat a GHG traps in the atmosphere, in this case, over a 100-year period.

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission (CEC) report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion, and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to adapt the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy (Strategy) analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of climate change: projecting the amount of climate change that may occur using computer-based global climate models, and assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from

this to understand how the systems may respond to the additional impact of climate change. The Strategy's key preliminary adaptation recommendations included:

- Appointment of a Climate Adaption Advisory Panel;
- Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020 from 2011 levels;
- Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;
- Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;
- Consideration of climate change impacts for all significant State projects;
- Assessment of climate change impacts on emergency preparedness;
- Identification of key habitats and development of plans to minimize adverse effects from climate change;
- Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;
- Amendment of General Plans and Local Coastal Plans to address climate change impacts and to develop local risk reduction strategies; and
- Inclusion of climate change impact information into fire program planning by State firefighting agencies.

Regulatory Setting

International

Kyoto Protocol. In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the U.S. joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt.

The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

The Protocol's major feature is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11th session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to three degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020, acknowledges that $100 billion is needed each year to enable countries to adapt to climate change. The agreement was signed into law on April 22, 2016.

The Western Regional Climate Action Initiative (WCI). The Western Regional Climate Action Initiative (WCI) is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The California Air Resources Board's (CARB) planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

Federal

The U.S. Environmental Protection Agency (USEPA) has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHG emissions could be considered within the Clean Air Act's definition of a pollutant.[31] In December 2009, USEPA issued an endangerment finding for GHG emissions under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and USEPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. This could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon in 2016.

In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding $8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, investments in renewable energy sources, adaptation programs, and leading international efforts to address climate change. In September 2013, USEPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants.

Vehicle Standards. Other regulations have been adopted to address vehicle standards including the USEPA and National Highway Traffic Safety Administration (the "NHTSA") joint rulemaking for vehicle standards.

- On March 30, 2009, the NHTSA issued a final rule for model year 2011.[32]
- On May 7, 2010, the USEPA and the NHTSA issued a final rule regulating fuel efficiency and GHG emissions pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016.[33]
- On August 9, 2011, USEPA and NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal GHG emissions and fuel economy standards for model year 2017-2025 light-duty vehicles.[34]

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31 Massachusetts v. Environmental Protection Agency et al (127 S. Ct. 1438 [2007])

32 NHSTA. 2009. Average Fuel Economy Standards Passenger Cars and Light Trucks Model Year 2011, Final Rule. 75 Fed. Reg. 25324.

33 USEPA. 2010. Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule. 75 Fed. Reg. 25324.

34 Available http://www.gpo.gov/fdsys/pkg/FR-2011-08-09/pdf/2011-19905.pdf. Accessed August 1, 2016.

- NHSTA intends to set standards for model years 2022-2025 in a future rulemaking.[35]

- In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the USEPA and the NHTSA announced fuel economy and GHG emissions standards for medium- and heavy-duty trucks that applies to vehicles from model year 2014–2018.[36]

Energy Independence and Security Act (the "EISA"). The EISA is intended to aid in the reduction of national GHG emissions, both mobile and non-mobile through several strategies:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.

- Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

- While superseded by NHTSA and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

State

Assembly Bill 1493: California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 was enacted in September 2003 and requires regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by vehicles used for personal transportation.

Executive Order S-3-05: On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to

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35 NHSTA. 2012. 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards. 77 Fed. Reg. 62624.

36 USEPA Office of Transportation and Air Quality. 2011. EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-Duty Vehicles. Available: http://www.epa.gov/otaq/climate/documents/420f11031.pdf. Accessed August 1, 2016.

2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency (Cal EPA) formed a Climate Action Team ("CAT") that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.[37] Furthermore, the report provided to Governor Schwarzenegger in 2006, referenced above, indicated that smart land use and increased transit availability should be a priority in the State of California.[38] According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Executive Order B-30-15: On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State's GHG targets with those set in October 2014 by the European Union and is intended to help the State meets its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs CARB to update the Climate Change Scoping Plan.

A recent study shows that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.[39]

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37 California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.

38 California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.

39 Greenblatt, Jeffrey, Energy Policy, "*Modeling California Impacts on Greenhouse Gas Emissions"* (Vol. 78, pp. 158-172).

Assembly Bill 32: In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, CARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[40] On October 25, 2007, CARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexaflouride emissions from the non-electricity sector. CARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO_2 per year and make up 94 percent of the point source CO_2 emissions in California.

CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by CARB in coordination with the CAT, was first published in October 2008 (the "2008 Scoping Plan"). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state's dependence on oil, diversify the state's energy sources, save energy, create new jobs, and enhance public health. It accommodated the State's projected population growth. Moreover, it expressly encouraged called for coordinated planning of growth, including the location of dense residential projects near transportation infrastructure, including public transit.

An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports.

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40 California Air Resources Board, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.

As required by AB 32, CARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

In order to assess the scope of reductions needed to return to 1990 emissions levels, CARB first estimated the 2020 "business-as-usual" (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the Scoping Plan, CARB updated the Scoping Plan through a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).[41] CARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.[42] Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent).

On May 22, 2014, CARB approved its first update to the AB 32 Scoping Plan, recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 million metric tons of CO_2e ($MMTCO_2e$) 1990 emissions level and 2020 GHG emissions limit would be slightly higher than identified in the Scoping Plan, at 431 $MMTCO_2e$. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the draft first update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 $MMTCO_2e$ (down from 507 $MMTCO_2e$) or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. CARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by CARB would serve to reduce the

41 California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011.

42 California Air Resources Board, *Greenhouse Gas Inventory – 2020 Emissions Forecast,* http://www.arb.ca.gov/cc/inventory/data/forecast.htm. Accessed August 1, 2016.

Project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors.[43,44]

As shown in **Table V-9**, **Emission Reductions Needed to Meet AB 32 Objectives in 2020,** these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program.

Table V-9
Emission Reductions Needed to Meet AB 32 Objectives in 2020

Sector	Million Metric Tons of CO_2e Reduction	Percent of Statewide CO_2e Inventory	Summary of Recommended Actions
Energy	-25	-4.9%	Reduce State's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	-23	-4.5%	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy
High Global Warming Potential	-5	-1.0%	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	-2	-0.4%	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Cap and Trade Reductions	-23	-4.5%	Statewide program that reduces emissions from regulated entities through performance-based targets
Total	-78	-15.3%	

Source: California Environmental Protection Agency, "First Update to the Climate Change Scoping Plan." May 2014.

Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the Transportation sector, which is charged

43 CARB, First Update, p. 4, May 2014. See also *id.* at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]

44 CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

with reducing 4.5% of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

Cap And Trade. CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

- Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons CO_2e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons CO_2e per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

- The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate.

- In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

- As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

In July 2017, the California State Legislature voted to extend the Cap and Trade Program through 2030.

Senate Bill 1368: Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

SB 97 & CEQA Guidelines: In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor's Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the CARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the CARB's recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If

analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

State Bill 375: SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.[45]

On October 24, 2008, CARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). CARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO2e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, CARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.[46] There is currently no timetable for finalized thresholds.

Senate Bill 32: In September 2016, Governor Brown signaled his intent to sign into law a measure that extends AB 32 another ten years to 2030 and increases the State's objectives. SB 32 calls on statewide reductions in GHG 40 percent below 1990 levels by 2030. Further regulatory actions by the State are forthcoming that will further challenge communities to reduce GHG emissions in the future.

45 American Planning Association, California Chapter, Analysis of SB 375, http://www.calapa.org/-en/cms/?2841.

46 California Air Resources Board. http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf

Title 24 Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California Green Building Standards. The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (the "CCR"), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The current 2013 CALGreen Code became effective January 1, 2014 and includes new requirements for additions to existing residential and non-residential development. The 2016 CALGreen Code standard became effective January 1, 2017.

Regional

South Coast Air Quality Management District Recommendations for Significance Thresholds:

The SCAQMD convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of CO2 equivalent (MTCO2e) as a screening numerical threshold for stationary sources.

The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions that recommended a screening threshold of 3,500 MTCO2e for residential projects, 1,400 MTCO2e for commercial projects, and 3,000 MTCO2e for mixed use projects. Additionally, the Working Group identified project-level efficiency target of 4.8 MTCO2e per service population as a 2020 target and 3.0 MTCO2e per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 MTCO2e and the plan-level target for 2035 was 4.1 MTCO2e. The SCAQMD has not established a timeline for formal consideration of these thresholds.[47] In the meantime, the project level thresholds are used as a non-binding guide.

The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the project.

SCAG Regional Transportation Plan/Sustainable Communities Strategy:

On April 7, 2016, SCAG adopted its 2016-2040 Regional Transportation Plan Sustainable Communities Strategy (the "RTP/SCS") update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040.

The RTP/SCS also includes a number of mitigation measures designed to reduce the potential of development to conflict with AB 32 or any other plan designed to reduce GHG.[48] These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized. Examples of GHG emissions reduction mitigation measures include the following:

MM-GHG-3(a)(4): SCAG shall work with utilities, sub-regions, and other stakeholders to promote accelerated penetration of zero- (and/or near zero) emission vehicles in the region, including developing a strategy for the deployment of public *charging* infrastructure.

47 SCAG, Final PEIR for the 2016-2040 RTP/SCS, Appendix G. Accessible at http://rtpscs, scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf

48 Southern California Association of Governments, Final PEIR, 2016-2040 RTP/SCS, Chapter 3.8

MM-GHG-3(a)(5): SCAG shall in its capacity as a Clean Cities Coalition establish coordinated, creative public outreach activities, including publicizing the importance of reducing *GHG* emissions and steps community members may take to reduce their individual impacts.

MM-GHG-3(a)(6): SCAG *shall* in its capacity as a Clean Cities Coalition establish coordinated, creative public outreach activities, including publicizing the importance of reducing GHG emissions and steps community members may take to reduce their individual impacts.

MM-GHG-3(a)(6): SCAG shall work with local community groups and business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian *and* bicycle modes of transportation such as the "Go Human" Campaign.

MM-GHG-3(a)(7): SCAG shall support and/or sponsor workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, *and* installing advanced irrigation systems.

MM-GHG-3(a)(8): SCAG shall in coordination with local jurisdictions (as practicable) support and/or sponsor a periodic Climate Protection Summits or Fairs, to educate the public on current climate science, projected local impacts, and local efforts and opportunities to reduce GHG emissions, including exhibits of the latest technology and products for conservation and efficiency.

MM-GHG-3(a)(9): Schools Programs: SCAG shall develop and implement a program in coordination with school districts to present information to students about climate change and ways to reduce GHG emissions, and will support school-based programs for GHG reduction, such as school-based trip reduction and the importance of recycling.

MM-GHG-3(a)(11): *SCAG* shall encourage local jurisdictions to support the following transportation-related strategies to reduce emissions:

Support the planning and development of HQTAs, jobs and housing balance, transit oriented development, and infill development through transportation investments and other funding decisions.

Offer incentives such as free or low-cost monthly transit passes to employees or free ride areas to residents and customers

Coordinate the funding of low carbon transportation with smart growth development.

Promote parking management measures that encourage walking and transit use in smart growth areas.

Develop comprehensive parking policies that encourages the use of alternative transportation

Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments, and create transit, bicycle, and pedestrian connections.

Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.

MM-GHG-3(a)(10): As part of SCAG's Sustainability Program, SCAG shall assist local jurisdictions in developing Climate Action Plans (CAPs, also known as Plans for the Reduction of Greenhouse Gas Emissions), as appropriate and feasible.

The SCAG RTP/SCS also identifies a number of recommended project-level mitigation measures in its EIR's Mitigation Measure MM-GHG-3(b), including:

- Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision.
- Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
- Off-site measures to mitigate a project's emissions.
- Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
    - Use energy and fuel efficient vehicles and equipment;
    - Deployment of zero- and/or near zero emission technologies;
    - Use lighting systems that are energy efficient, such as LED technology;
    - Use the minimum feasible amount of GHG-emitting construction materials that is feasible;

- Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
- Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
- Incorporate design measures to reduce energy consumption and increase use of renewable energy;
- Incorporate design measures to reduce water consumption;
- Use lighter-colored pavement where feasible;
- Recycle construction debris to maximum extent feasible;
- Plant shade trees in or near construction projects where feasible; and
- Solicit bids that include concepts listed above.

- Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to:
  - Transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles;
  - Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network;
  - Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations;
  - Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs; and
  - Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles.

- Land use siting and design measures that reduce GHG emissions, including:
  - Developing on infill and brownfields sites;
  - Building high density and mixed use developments near transit; and
  - Retaining on-site mature trees and vegetation, and planting new canopy trees.
- Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles.
- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

Local

City of Los Angeles: The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.[49] Larger projects must be certified at the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification generally ensures that projects exceed Title 24 (2013) standards by at least 10 percent.[50] The City's ordinance affects the following types of development:[51]

- New non-residential building or structure of 50,000 gross square feet or more of floor area;
- New mixed-use or residential building of 50,000 gross square feet or more in excess of six stores;
- New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;

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49 City of Los Angeles, Ordinance No. 179820, added to LAMC as Section 16.10 (Green Building Program).

50 U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 February 26, 2015.

51 Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.

- The alternation or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;

- The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.

The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new low-rise residential buildings, including:

Section 99.04.106.2. Storm Water Drainage and Retention During Construction. Projects which disturb less than one acre of soil and are not part of a larger common plan of development which in total disturbs one acre or more, shall manage storm water drainage during construction. In order to manage storm water drainage during construction, one or more of the following measures shall be implemented to prevent flooding of adjacent property, prevent erosion, and retain soil runoff on the site:

1. Retention basins of sufficient size shall be utilized to retain storm water on the site.

2. Where storm water is conveyed to a public drainage system, collection point, gutter, or similar disposal method, water shall be filtered by use of a barrier system, wattle or other method approved by the Department, or

3. Compliance with the City of Los Angeles' storm water management ordinance(s).

Section 99.04.204. Energy Reduction. Prescriptive Approach. Equipment and fixtures shall comply with the following where applicable:

1. Installed gas-fired space heating equipment shall have an Annual Fuel Utilization Ratio (AFUE) of .90 or higher.

2. Installed electric heat pumps shall have a Heating Seasonal Performance Factor (HSPF) of 8.0 or higher.

3. Installed cooling equipment shall have a Seasonal Energy Efficiency Ratio (SEER) higher than 13.0 and an Energy Efficiency Ratio (EER) of at least 11.5.

4. Installed tank type water heaters shall have an Energy Factor (EF) higher than .6.

5. Installed tankless water heaters shall have an Energy Factor (EF) higher than .80.

6. Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.

7. Building lighting in the kitchen and bathrooms within the dwelling units shall consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

8. Installed swimming pool circulating pump motors shall be multi-speed or variable-speed. The pump motor controls shall have the capability of operating the pump at a minimum of three speeds; low speed, medium speed, and high speed. The daily low speed shall not exceed 300 watts. The daily medium speed shall be adjustable.

Section 99.04.210. Appliances. Appliance Rating. Each appliance provided and installed shall meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

Section 99.04.211. Renewable Energy. Future Access for Electrical Solar System. An electrical conduit shall be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system. Exception: Buildings designed and constructed with a solar photovoltaic system or an alternate system with means of generating electricity at time of final inspection.

Section 99.04.211.4.1. Space for Future Electrical Solar System Installation. A minimum of 250 square feet of contiguous unobstructed roof area shall be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Section 99.04.303.1. Twenty Percent Savings. A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:

1. Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or

2. A calculation demonstrating a 20 percent reduction in the building "water use" baseline as established on Table 4.303.1 shall be provided. For low-rise residential occupancies, the calculation shall be limited to the following plumbing fixture and fitting types: water closets, urinals, lavatory faucets, kitchen faucets, and showerheads.

Section 99.04.303.2. Multiple Showerheads Serving One Shower. When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads shall not exceed the maximum flow rates specified in the 20 percent reduction column contained on Table 4.303.2 or the shower shall be designed to only allow one showerhead to be in operation at a time. Exception: The maximum flow rate for showerheads when using the calculation method specified in Section 99.04.303.1, Item 2, is 2.5 gpm @ 80 psi.

Section 99.04.304.1. Irrigation Controllers. When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;

2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input. Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers that meet the criteria in Section 99.04.304.1.

Section 99.04.406. Enhanced Durability and Reduced Maintenance. Joints and Openings. Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.

Section 99.05.407.3. Water Resistance and Moisture Management. Flashing Details. Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Section 99.04.407.4. Material Protection. Protect building materials delivered to the construction site from rain and other sources of moisture.

Section 99.4.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent. Pursuant to Section 66.32 et seq. of the LAMC.

Section 99.04.504.1. Covering of Duct Openings and Protection of Mechanical Equipment During Construction. At the time of rough installation or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheetmetal or other methods acceptable to the Department to reduce the amount of dust or debris which may collect in the system.

Section 99.04.505.2. Interior Moisture Control. Concrete Slab Foundations. Concrete slab foundations required to have a vapor retarder by Los Angeles Building Code, Chapter 19, shall also comply with this section.

Section 99.04.505.2.1. Interior Moisture Control. Capillary Break. A capillary break shall be installed in compliance with at least one of the following:

1. A 4-inch (101.6 mm) thick base of ½ inch (12.7 mm) or larger clean aggregate shall be provided with a vapor barrier in direct contact with concrete and a concrete mix design, which will address bleeding, shrinkage, and curling, shall be used.

2. Other equivalent methods approved by the Department, or

3. A slab design specified by a licensed design professional.

Section 99.04.505.3. Interior Moisture Control. Moisture Content of Building Materials. Building materials with visible signs of water damage shall not be installed. Wall and floor framing shall not be enclosed until it is inspected and found to be satisfactory by the building inspector. Insulation materials which are visibly wet or have high moisture content shall be replaced or allowed to dry prior to enclosure in wall or floor cavities. Wet-applied insulation materials shall follow the manufacturers' drying recommendations prior to enclosure.

On January 20, 2016, the City of Los Angeles adopted its Mobility Plan 2035, a transportation element of its General Plan. The Plan calls for strategies that advance five goals: 1) Safety First, 2) World Class Infrastructure, 3) Access for All Angelenos, 4) Collaboration, Communication, and Informed Choices, and 5) Clean Environments and Healthy Communities.

While the Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and

targeting GHG through a more sustainable transportation system. As such, the Plan's call for integrated land use planning, clean fuel vehicles are consistent with State and regional plans calling for more compact growth in areas with transportation infrastructure.

Existing Emissions

The Project Site includes is currently the site of an outdoor courtyard that supports the adjacent Montecito Apartments. As such, it does not generate anthropogenic emissions and is assumed to have de minimis GHG emissions.

Methodology

The methodology utilized for this analysis is based on a Technical Advisory released by the Governor's Office of Planning and Research (OPR) on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.[52] The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."[53] The General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the General Reporting Protocol's reporting requirements.

52 California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed August 1, 2016.

53 Ibid.

The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.

Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).[54]

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.[55] For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research has noted that lead agencies "should make a good-faith effort, based on available information, to calculate, model, or estimate… GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[56] Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's California Emissions Estimator Model (CalEEMod). Operational emissions include

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54 Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.

55 California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed August 1, 2016.

56 OPR Technical Advisory, p. 5.

both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. 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 and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[57]

Significance Criteria

CARB, SCAQMD, and the City of Los Angeles have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.[58] As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would:

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

2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.[59]

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. It urges the quantification of GHG emissions where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. It also recommends considering other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). Further, it states that:

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57 See www.caleemod.com.

58 The South Coast Air Quality Management District formed a GHG Significance Threshold Working Group. Information on this Working Group is available at www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2 .

59 A recent opinion by the California Supreme Court on November 30, 2015 (Center for Biological Diversity v. California Department of Fish and Wildlife) has suggested that environmental analyses need to support its assumptions and provide evidentiary support to find consistency with a "Business as Usual" approach with the AB 32 Scoping Plan.

1. A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:

    a. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

    b. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

    c. 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 greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA Guidelines were amended in response to Senate Bill 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[60] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."[61] Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding

60 Id.

61 Id. (emphasis added).

of non-significance for GHG emissions if a project compiles with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.[62]

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[63]

To evaluate a project's potential greenhouse gas emissions under CEQA, a lead agency may adopt a significance criterion of whether the project will be consistent with statewide greenhouse gas emission reduction goals, as set forth in the California Global Warming Solutions Act of 2006 (or "AB 32") and the California Air Resources Board 2008 Climate Change Scoping Plan ("Scoping Plan") that implements A.B. 32. (*Center for Biological Diversity v. Cal. Dept. of Fish and Game* (2015) 62 Cal.4th 204, 220; see also CEQA Guidelines § 15064.4.) The City of Los Angeles has not adopted a significance criterion in line with statewide greenhouse gas emission reduction goals.

The statewide greenhouse gas reduction goals include cutting greenhouse gas emissions by approximately 30 percent from the BAU emission levels projected for 2020. The Scoping Plan sets forth the BAU projection, which assumes no conservation or regulatory efforts beyond what was in place when the forecast was made. A lead agency may use the BAU projection as the baseline to compare a project's expected greenhouse gas emissions rather than using a baseline of emissions in the existing physical environment. However, the lead agency must provide substantial evidence to show that a project's specific *project-level* reduction in

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62 See San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), where the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, SCAQMD has taken this position as a lead agency, preparing three Negative Declarations and one Draft EIR that applied its 10,000 $MTCO_2e$/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH #2012041014 (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2) (October 2014); SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2) (December 2014); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2) (April 2014).

63 14 CCR § 15064(h)(3).

greenhouse gas emissions as compared to the BAU projection will actually meet the *statewide* goals of greenhouse gas reductions.

There are three ways a lead agency could make that showing. First, a lead agency may evaluate the data behind the Scoping Plan's BAU model to determine how a specific project in a proposed location would contribute to the statewide greenhouse gas reduction goals. Second, a lead agency may assess a project's consistency with AB 32's goals in whole or in part by considering a project's compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities, such as building efficiency and conservation standards. Third, a lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions reductions.

Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles ClimateLA implementation plan; and
- City of Los Angeles Green Building Ordinance

The following section provides an extensive analysis of the Proposed Project's consistency with these State, regional, and local climate action-related policies. This section focuses on disclosing potential GHG emissions.

Would the project:

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

Construction

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle

trips generated by construction workers and vendors traveling to and from the Project site. These impacts would vary day to day over the 20-month duration of construction activities. As illustrated in **Table V-10, Estimated Construction Emissions - Mitigated** construction emissions of CO_2 would peak in 2017, when up to 5,362 pounds of CO_2e per day are anticipated. These emissions are further incorporated in the assessment of long-term operational impacts by amortizing them over a 30-year period, pursuant to guidance from the State and SCAQMD.

Table V-10
Estimated Construction Emissions - Mitigated

Construction Year	CO_2	CH_4	N_2O	CO_2e
2018	5,344	1	0	5,362
2019	3,512	<1	0	3,524
2020	3,467	<1	0	3,479
Source: DKA Planning 2016, based on CalEEMod 2016.3.1				

Operation

Greenhouse gas emissions were calculated for long-term operations. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

This analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures (i.e., the No Action Taken (NAT) Scenario. This approach is consistent with the concepts used in the CARB's Climate Change Scoping Plan for the implementation of AB 32. This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The analysis in this section includes potential emissions under NAT scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the Climate Change Scoping Plan that have not been

approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

The analysis below establishes NAT as complying with the minimum performance level required under Title 24. The NAT scenario also considers State mandates that were already in place when CARB prepared the Supplemental FED (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard).

Emissions calculations for the Project include credits or reductions for the regulatory compliance measures and project design features set forth throughout this analysis, such as reductions in energy or water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project generated trips as a result of project features will provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent.

As shown in **Table V-11, Estimated Annual CO2e Greenhouse Gas Emissions (Metric Tons per Year),** the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 736 and 1,099 MTCO2e per year, respectively, which shows the Project will reduce emissions by 33 percent from the CARB 2020 NAT scenario. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan.

Table V-11
Estimated Annual CO2e Greenhouse Gas Emissions (Metric Tons per Year)

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	1	1	-	0%
Energy Sources	494	286	-207	-42%
Mobile Sources	520	365	-155	-30%
Waste Sources	16	16	-	0%
Water Sources	56	56	-	0%
Construction	12	12	-	0%
Total Emissions	**1,099**	**736**	**-362**	**-33%**

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

** NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

Source: DKA Planning, 2016.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate because the Proposed Project would not hinder attainment of statewide GHG reduction goals. Specifically, the Proposed Project's location in an existing urban setting provide opportunities to reduce transportation-related emissions, as it would eliminate many vehicle trips because travel to and from the Project Site could be captured by public transit and pedestrian travel instead. As such, this analysis concludes that the Proposed Project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decision-making.

It should be noted that each source category of GHG emissions from the Proposed Project is subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

- Stationary and area sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.

- Transportation. Both construction and operational activities from the Project Site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.

- Energy Use. Both construction and operational activities from the Project Site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.

- Building structures. Operational efficiencies will be built into the project that reduce energy use and waste, as mandated by CALGreen building codes. For example, these measures include regulations on maximum lighting power, mechanical and natural ventilation, and insulation requirements.

- Water and wastewater use. The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.

- Major appliances. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.

- Solid waste management. The Project would be subject to solid waste diversion policies administered by CalRecycle and the regulations required by the City of Los Angeles to reduce GHG emissions. These regulations include details on the removal of refuse from the premises and mandatory recycling regulations for multi-family residences.

In addition to the GHG emission reductions described above, it is important to note that the CO_2 estimates from mobile sources (particularly CO_2, CH_4, and N_2O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (e.g., commuting, shopping) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

As described throughout this analysis, the Project contains numerous regulatory compliance measures and project design features that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant.

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

- **Less than significant impact.** The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted earlier, the Proposed Project would be consistent with a number of relevant plans and policies that govern climate change.

  - Executive Orders S-3-05 and B-30-15;
  - AB 32 Scoping Plan;
  - SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy;
  - City of Los Angeles Mobility 2035 Plan;
  - City of Los Angeles ClimateLA implementation plan; and
  - City of Los Angeles Green Building Ordinance

  Consistency with Executive Orders S-03-05 and B-30-15.

  The Project is consistent with the State's Executive Orders S-3-05 and B-30-15, which are orders from the State's Executive Branch for the purpose of reducing GHG emissions.

These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's emissions profile to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at build-out presented in this analysis represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with the Executive Order's horizon-year goal.

Many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "…for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in CARB's First Update to the AB 32 Scoping Plan.[64,65]

As such, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. **Table V-12, Project Consistency with AB 32 Scoping Plan** evaluates the Proposed Project's consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global

64 CARB, First Update, p. 4, May 2014. See also *id.* at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]

65 CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

climate change. The Proposed Project is consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors:

- **Energy Sector:** Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the Project's emissions level.[66] Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[67] The project would indirectly benefit from these improvements.

- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.[68] The project would indirectly benefit from these improvements.

- **Water Sector:** The Project's emissions level will be reduced as a result of further desired enhancements to water conservation technologies. Such improvements include new conservation measures and efficiency stands, water-energy nexus rulemaking, incentives for resource-recovering wastewater treatment projects, and implementation of green infrastructure permits to treat and capture urban runoff for local use.[69]

- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project's emissions level.[70] The project would indirectly benefit from these improvements.

Table V-12
Project Consistency with AB 32 Scoping

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	**Not Applicable.** The statewide program is not relevant to the proposed Project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Not Applicable.** The development of standards is not relevant to the proposed Project.
Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency	**Consistent.** The Project is designed to meet CALGreen building standards by

66 CARB, First Update, pp. 37-39, 85, May 2014.

67 CARB, First Update, pp. 40-41, May 2014.

68 CARB, First Update, pp. 55-56, May 2014.

69 CARB, First Update, p. 65, May 2014.

70 CARB, First Update, p. 69, May 2014.

Strategy	Project Consistency
efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	including several measures designed to reduce energy consumption.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	**Consistent.** The Project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Not Applicable.** The statewide program is not relevant to the proposed Project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	**Not Applicable.** The development of regional planning goals is not relevant to the proposed Project.
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not Applicable.** State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Consistent.** The Proposed Project includes 15 percent of the roof area set aside for future solar roofs.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	**Not Applicable.** This measure addresses industrial facilities.
High Speed Rail. Support implementation of a high speed rail system.	**Not Applicable.** This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The Project is designed to meet CALGreen building standards and will include several measures designed to reduce energy consumption. A list of such measures can be found in the Project Description on page II-8 and II-9.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	**Not Applicable**. State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	**Consistent.** The Project is expected to have minimal impact on solid waste facilities. Specific measures to be incorporated into the Proposed Project to the extent feasible would include, but are not limited to: recycling of asphalt, concrete, metal, wood and cardboard waste generate during demolition and construction.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not Applicable**. Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner	**Consistent.** The Project would use water-efficient landscaping and irrigation

Strategy	Project Consistency
energy sources to move and treat water.	systems. The Project would comply with CALGreen requirements of the California Building Code and the LAGBC, the Water Management Ordinance (Ordinance No. 170,978), and the LID Ordinance, which are designed to reduce the Project's energy and water use.
Agriculture. In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not Applicable.** The Proposed Project does not include agricultural facilities.
Source: DKA Planning, 2016.	

Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan.

Consistency with SCAG's 2012-2035 RTP/SCS

At the regional level, the 2012-2035 RTP and Sustainable Communities Strategy represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with the RTP/SCS, this section analyzes the Project's land use profiled for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

Table V-13
Project Consistency with SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Land Use Actions and Strategies		
Coordinate ongoing visioning efforts to build consensus on growth issues among local governments and stakeholders.	SCAG	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. Nonetheless, the City, which is the lead agency for the Project, regularly coordinates with SCAG on regional growth issues.
Provide incentives and technical assistance to local governments to encourage projects and programs that balance the needs of the region.	SCAG	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. Nonetheless, the City, which is the lead agency for the Project, regularly coordinates with SCAG on its advancement of projects and programs that meet regional needs. Furthermore, the Project would support this measure by providing needed housing.
Collaborate with local jurisdictions and agencies to acquire a regional fair share housing allocation that reflects	SCAG Local Jurisdictions HCD	**Consistent.** The Project would accommodate regional growth projected by SCAG in the Los Angeles Planning Area by providing needed housing in an infill site that is adjacent to existing, approved, and planned infrastructure, urban services, transportation corridors, transit facilities, and major

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
existing and future needs.		employment centers, in furtherance of SB 375 policies.
Expand Compass Blueprint program to support member cities in the development of bicycle, pedestrian, Safe Routes to Schools, Safe Routes to Transit, and ADA Transition plans.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. The Project would not impair SCAG or the State's expansion of the Compass Blueprint program. The network of streets surrounding the Project Site provide sidewalks connected to transit stops to promote alternative transportation.
Continue to support, through Compass Blueprint, local jurisdictions and sub-regional COGs adopting neighborhood-oriented development, suburban villages, and revitalized main streets as livability strategies in areas not served by high-quality transit.	SCAG State Local Jurisdictions COGs	**Consistent.** The Project contains multi-family senior residential uses in close proximity to jobs, destinations, and other neighborhood services.
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.	Local Jurisdictions COGs SCAG CTCs	**Consistent.** While the use of alternatively-fueled vehicles by the Project's future residents is market driven and beyond the direct control or influence of the Project Applicant, the Project would not impair the City's or SCAG's ability to encourage the use of alternatively-fueled vehicles through various policies and programs.
Continue to support, through Compass Blueprint, planning for new mobility modes such as range- limited Neighborhood Electric Vehicles (NEVs) and other alternative fueled vehicles.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. However, as noted above, the Project would not impair any jurisdiction's ability to encourage the use of alternative-fueled vehicles.
Collaborate with the region's public health professionals to enhance how SCAG addresses public health issues in its regional planning, programming, and project development activities.	SCAG State Local Jurisdictions	**Consistent.** The Project would not impair the City's, SCAG's, or the State's ability to collaborate with the region's public health professionals regarding the integration of public health issues in regional planning. Additionally, the Project would encourage healthy lifestyles through the provision of ample bicycle parking spaces on-site. The Project would also incorporate measures to reduce air emissions and greenhouse gases, minimize hazards, and ensure water quality.
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions SCAG	**Consistent.** The Project would encourage healthy lifestyles through the provision of bicycle parking spaces.
Seek partnerships with state, regional, and local agencies to acquire funding sources for	Local Jurisdictions SCAG	**Consistent.** The Project would not impair the City's, SCAG's or the State's ability to seek partnerships in furtherance of funding acquisition. Additionally, the Project would support

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
innovative planning projects.	State	this measure by providing needed housing that would serve not just Project residents but the community at large.
Update local zoning codes, General Plans, and other regulatory policies to accelerate adoption of land use strategies included in the 2012–2035 RTP/SCS Plan Alternative, or that have been formally adopted by any subregional COG that is consistent with regional goals.	Local Jurisdictions	**Consistent.** While not necessarily applicable on a project-specific basis, the Project would support this action/strategy via consistency with SCAG's 2012–2035 RTP/SCS Plan.
Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational, and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts.	Local Jurisdictions	**Consistent.** While not necessarily applicable on a project-specific basis, the Project would support this action/strategy by creating a residential development near transit services.
Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance.	Local Jurisdictions SCAG	**Consistent.** The Project would create multi-family senior residential uses in close proximity to jobs, destinations, and other neighborhood services.
Pursue joint development opportunities to encourage the development of housing and mixed-use projects around existing and planned rail stations or along high-frequency bus corridors, in transit-oriented development areas, and in neighborhood-serving commercial areas.	Local Jurisdictions CTCs	**Consistent.** The Project would accommodate regional growth projected by SCAG in the Los Angeles Planning Area within an infill site that is adjacent to existing, approved, and planned infrastructure, urban services, transportation corridors, transit facilities, and major employment centers in furtherance of SB 375 policies.
Working with local jurisdictions, identify resources that can be used for employing strategies to maintain and assist in the development of affordable housing.	SCAG Local Jurisdictions	**Consistent.** The Project includes residential housing to serve the needs of a growing and increasingly diverse population within the City.
Consider developing healthy community or active design guidelines that promote physical activity and improved health.	Local Jurisdictions	**Consistent.** As discussed above, the Project would encourage healthy lifestyles through the provision of bicycle parking.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Support projects, programs, policies, and regulations to protect resources areas, such as natural habitats and farmland, from future development.	Local Jurisdictions SCAG	**Not Applicable.** The Project neither protects nor threatens resource areas from urbanization.
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State SCAG	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. In any event, the Project would be consistent with the overarching goal of SB 375 to reduce vehicle miles traveled and the corresponding emission of GHGs.
Continue partnership with regional agencies to increase availability of state funding for integrated land use and transportation projects in the region.	State SCAG	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. The Project would not impair the ability of SCAG and the State to increase the availability of funding for certain types of projects.
Engage in a strategic planning process to determine the critical components and implementation steps for identifying and addressing open space resources, including increasing and preserving park space, specifically in park-poor communities.	Local Jurisdictions SCAG	**Consistent.** The Project would not impair the ability of the City and SCAG to engage in strategic planning processes to address recreational/park shortages in existing communities. As previously discussed, the Project is a senior residential community in close proximity to public transit.
Identify and map regional priority conservation areas for potential inclusion in future plans.	SCAG	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. The Project would not impair SCAG's ability to implement this action/strategy.
Engage with various partners, including CTCs and local agencies, to determine priority conservation areas and develop an implementable plan.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to engage with various partners on issues pertaining to conservation areas.
Develop regional mitigation policies or approaches for the 2016 RTP.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to develop regional mitigation policies or approaches for the future 2016 RTP.
Transportation Network Actions and Strategies		
Perform and support studies with the goal of identifying innovative transportation strategies that enhance mobility and air quality, and determine practical steps to pursue such strategies, while engaging local communities in planning efforts.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to perform and support various studies.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Cooperate with stakeholders, particularly county transportation commissions, and Caltrans, to identify new funding sources and/or increased funding levels for the preservation and maintenance of the existing transportation network.	SCAG CTCs Local Jurisdictions	**Consistent.** While not necessarily applicable on a project-specific basis, the Project would support this action/strategy improving local access, with appropriate design considerations to ensure travel safety and reliability.
Expand the use of transit modes in our subregions such as BRT, rail, limited-stop service, and point-to-point express services utilizing the HOV and HOT lane networks.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project would not impair the ability of SCAG, the CTCs, or the City to expand and extend the use of other transit modes to the Project Site.
Encourage transit providers to increase frequency and span of service in TOD/HQTA and along targeted corridors where cost-effective and where there is latent demand for transit usage.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to encourage transit provided to increase the frequency and span of service.
Encourage regional and local transit providers to develop rail interface services at Metrolink, Amtrak, and high-speed rail stations.	SCAG CTCs Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would not impair the ability of SCAG, CTCs, or the City to encourage rail interface services.
Expand the Toolbox Tuesdays program to include bicycle safety design, pedestrian safety design, ADA design, training on how to use available resources that expand understanding of where collisions are happening, and information on available grant opportunities to improve bicycle and pedestrian safety.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. However, the Project would neither support nor adversely impact the expansion of Toolbox Tuesday opportunities.
Prioritize transportation investments to support compact infill development that includes a mix of land uses, housing options, and open/park space, where appropriate, to maximize the benefits for existing communities, especially vulnerable populations, and to minimize any negative impacts.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project represents infill development offering senior housing in close proximity to jobs, destinations, and other neighborhood services.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles (NEVs) or other alternative fueled vehicles.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project is a bicycle-friendly development and would provide opportunities for residents to walk to nearby community-serving businesses. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors.
Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project's residential units would be located within walking distance of existing and proposed neighborhood commercial centers, both on- and off-site, thus reducing the number and length of vehicle trips.
Collaborate with local jurisdictions to provide a network of local community circulators that serve new TOD, HQTAs, and neighborhood commercial centers providing an incentive for residents and employees to make trips on transit.	SCAG CTCs Local Jurisdictions	**Consistent.** As discussed above, the Project's residential units would be located within walking distance of existing and proposed neighborhood commercial centers.
Similar to SCAG's partnership with the City of Los Angeles and LACMTA, offer to all County Transportation Commissions a mutually funded, joint first mile/last mile study for each region.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. In any event, the Project would not impair SCAG's or the CTCs' ability to offer the mutually-funded study.
Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other ZEV options.	CTCs Local Jurisdictions	**Consistent.** The Project would not impair the CTCs' or the City's ability to develop first-mile/last-mile strategies. In support of this action/strategy, the Project's residential units would be located within walking distance of existing and proposed neighborhood commercial centers, both on- and off-site.
Encourage transit fare discounts and local vendor product and service discounts for residents and employees of TOD/HQTAs or for a jurisdiction's local residents in general who have fare media.	Local Jurisdictions	**Consistent.** The Project would not impair the City's ability to encourage transit fare and other discounts.
Work with transit properties and local jurisdictions to identify and remove barriers to maintaining on-time performance.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project would not impair the SCAG's, CTCs', or the City's ability to work with transit properties to remove barriers to on-time performance.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Develop policies and prioritize funding for strategies and projects that enhance mobility and air quality.	State	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is the State of California.
Work with the California High-Speed Rail Authority and local jurisdictions to plan and develop optimal levels of retail, residential, and employment development that fully take advantage of new travel markets and rail travelers.	State	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is the State of California.
Work with state lenders to provide funding for increased transit service in TOD/HQTA in support of reaching SB 375 goals.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California.
Continue to work with neighboring Metropolitan Planning Organizations to provide alternative modes for interregional travel, including Amtrak and other passenger rail services and an enhanced bikeway network, such as on river trails.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California.
Encourage the development of new, short haul, cost-effective transit services such as DASH and demand responsive transit (DRT) in order to both serve and encourage development of compact neighborhood centers.	CTCs Municipal Transit Operators	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are CTCs and Municipal Transit Operators.
Work with the state legislature to seek funding for Complete Streets planning and implementation in support of reaching SB 375 goals.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California.
Continue to support the California Interregional Blueprint as a plan that links statewide transportation goals and regional transportation and land use goals to produce a unified transportation strategy.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. Nonetheless, the Project would provide needed senior housing in close proximity to the regional roadway network.
Transportation Demand Management (TDM) Actions and Strategies		
Examine major projects and strategies that reduce congestion and emissions and optimize the productivity and overall performance of the transportation system.	SCAG	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Develop comprehensive regional active transportation network along with supportive tools and resources that can help jurisdictions plan and prioritize new active transportation projects in their cities.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project would promote the development of a comprehensive regional active transportation network by locating more potential bicycle and pedestrians that would travel using non-motorized transportation modes.
Encourage the implementation of a Complete Streets policy that meets the needs of all users of the streets, roads and highways—including bicyclists, children, persons with disabilities, motorists, neighborhood electric vehicle (NEVs) users, movers of commercial goods, pedestrians, users of public transportation and seniors—for safe and convenient travel in a manner that is suitable to the suburban and urban contexts within the region.	Local Jurisdictions COGs SCAG CTCs	**Not Applicable.** While the City would be the implementing agency for any Complete Streets project, the Proposed Project would neither benefit nor adversely affect the implementation of infrastructure that benefits alternative transportation modes.
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG Local Jurisdictions	**Not Applicable.** Future tenants of the residential units could be encouraged to utilize alternative transportation modes. The inclusion of bicycle parking for future residents will help promote active transportation modes. In addition to bicycles, the Proposed Project is located in a transit-priority area where various LADOT and Metro buses serve the immediate area for easy access. Bus service specifically for seniors is provided through various local programs such as LADOT's CityRide assistance program which is for individuals age 65 or older and qualified disabled persons.
Develop infrastructure plans and educational programs to promote active transportation options and other alternative fueled vehicles, such as neighborhood electric vehicles (NEVs), and consider collaboration with local public health departments, walking/biking coalitions, and/or Safe Routes to School initiatives, which may already have components of such educational programs in place.	Local Jurisdictions	**Not Applicable.** While local governments are responsible for implementing this, the Proposed Project would neither benefit nor adversely impact the City's development of infrastructure and education programs that promote alternative fueled vehicles or other initiatives that reduce congestion and air pollution.
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions CTCs	**Not Applicable.** While local governments are responsible for implementing this, the Proposed Project would neither benefit nor adversely impact the City's development of telecommuting programs by employers that reduce congestion and air pollution.
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	State SCAG Local Jurisdictions	**Not Applicable.** While local governments are responsible for implementing this, the Proposed Project would neither benefit nor adversely impact the City's development of active transportation and alternative fuel vehicle programs that promote alternative fueled vehicles or other initiatives that reduce congestion and air pollution.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Transportation System Management (TSM) Actions and Strategies		
Work with relevant state and local transportation authorities to increase the efficiency of the existing transportation system.	SCAG Local Jurisdictions State	**Consistent.** The Project would not impair the ability of SCAG, the City, or the State to work with transportation authorities to increase the efficiency of the existing transportation system. All improvements would be constructed in accordance with LADOT requirements, as appropriate. Further, the Project would mitigate any significant impacts to local and regional roadways to the extent feasible, as required by CEQA.
Collaborate with local jurisdictions and subregional COGs to develop regional policies regarding TSM.	SCAG COGs Local Jurisdictions	**Consistent.** The Project would not impair the ability of SCAG, the COGs, or the City to collaborate on the development of regional TSM policies. All Project transportation-related improvements would be developed in consultation with LADOT and/or transit service providers, as appropriate, and constructed in compliance with their respective standards.
Contribute to and utilize regional data sources to ensure efficient integration of the transportation system.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. However, the Project traffic analysis is based on a traffic model developed by LADOT as the primary tool for forecasting traffic volumes within the City of Los Angeles. In addition, SCAG's regional data, including population, housing, and employment forecasts are used where appropriate throughout this analysis.
Provide training opportunities for local jurisdictions on TSM strategies, such as Intelligent Transportation Systems (ITS).	SCAG Local Jurisdictions	**Consistent.** While not necessarily applicable on a project-specific basis, the Project would not impair the ability of SCAG or the City to provide TSM strategy training. However, the Project would support transportation system management strategies via the provision of appropriate roadway improvements that meet LADOT requirements, as appropriate.
Collaborate with local jurisdictions and subregional COGs to continually update the ITS inventory.	SCAG COGS Local Jurisdictions	**Consistent.** The Project would not impair the ability of SCAG, the COGs, or the City to collaborate on updates to the ITS inventory. See the discussion above regarding the Project's support of transportation system management strategies.
Collaborate with CTCs to regularly update the county and regional ITS architecture.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project does not impair the ability of SCAG, the CTCs, or the City to collaborate on updates to the ITS architecture.
Collaborate with the state and federal Government and subregional COGs to examine potential innovative TDM/TSM strategies.	SCAG State COGs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG, the State of California, and the COGs.
Clean Vehicle Technology Actions and Strategies		
Develop a Regional PEV Readiness Plan with a focus on charge port infrastructure plans to support and promote the introduction of electric and other alternative fuel vehicles in Southern California.	SCAG	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Support subregional strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emission technologies. The activities committed in the two subregions are put forward as best practices that others can adopt in the future.	SCAG Local Jurisdictions	**Consistent.** While the acceleration of fleet conversion by the Project's future residents is market driven and beyond the direct control or influence of the Project applicant, the Project would not impair the City's or SCAG's ability to support subregional strategies in furtherance of that conversion.

SCAG = Southern California Association of Governments
HCD = California Department of Housing and Community Development
COG = subregional council of governments
CTCs = county transportation commissions
TOD = transit-oriented development
HQTA = High Quality Transit Area
[a] *"Not Applicable" actions/strategies are those that are not identified for implementation by Local Jurisdictions. The Project's consistency with any actions/strategies identified for implementation by the Local Jurisdictions (i.e., the City of Los Angeles) is assessed above.*
Source: SCAG 2012–2035 RTP/SCS, Chapter 4: Sustainable Communities Strategy, Tables 4.3 through 4.7; April 2012.

Table V-13, Project Consistency with SCAG 2016-2040 RTP/SCS demonstrates the Project's consistency with the Actions and Strategies set forth in the 2012–2035 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2012–2035 RTP/SCS.

Consistency with SCAG's 2016-2040 RTP/SCS

At the regional level, the 2016-2040 RTP and Sustainable Communities Strategy represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with the RTP/SCS, this section analyzes the Project's land use profile for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The Proposed Project is an infill development that is also consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the site's location near substantial local transit bus services will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the RTP/SCS. Further, the inclusion of electric

vehicle charging infrastructure will support the penetration of electric zero-emission vehicles into the vehicle fleet.

Table V-14
Project Consistency with SCAG 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	**Consistent.** The Project would include residences that would add to the supply of housing in metropolitan Los Angeles County.
Focus new growth around transit.	Local Jurisdictions	**Consistent.** The Proposed Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	**Consistent.** The Proposed Project is an infill development that would be consistent with the 2016 RTP/SCS focus on focusing growth along the 2,980 miles of Livable Corridors in the region.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	**Consistent.** The Proposed Project would help further jobs/housing balance objectives that can improve the use of Neighborhood Electric Vehicles for short trips. The project is also generally consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	**Not Applicable.** While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Proposed Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	**Consistent.** The Proposed Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
Transportation Strategies		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy calls on investing in the maintenance of our existing transportation system, the Proposed Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	**Not Applicable.** The Proposed Project is an infill development that will minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Proposed Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Proposed Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure in the proposed parking structure where 5-percent of total spaces would be designated for low emitting, fuel efficient and carpool/van pool vehicles.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG Local Jurisdictions	**Not Applicable.** While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the Proposed Project would not interfere with these emerging programs.

Source: Southern California Association of Governments; *2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth*; April 2016.

Table V-14, Project Consistency with SCAG 2016-2040 RTP/SCS demonstrates the Project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

Consistency with the City of Los Angeles Mobility 2035 Plan

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The Proposed Project is fully consistent with these general objectives, including the most relevant strategy, Program No. D7, which calls for the development of GHG

tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled.

Consistency with the City of Los Angeles ClimateLA Plan

Construction of the Proposed Project is consistent with Mayor Eric Garcetti's 2014 initiative, Sustainable City "pLAn".The pLAn is a comprehensive and actionable policy roadmap that prepares the City for an environmentally healthy, economically prosperous, and equitable future for all. Mayor Garcetti released the pLAn in April 2015 along with a corresponding Executive Directive (ED-#5) that incorporates that pLAn into city-wide management. The framework of pLAn sets forth a vision of things to be accomplished in the next 20 years and highlighted near- and long-term outcomes. The pLAn focuses on local water, local solar, energy-efficient buildings, carbon and climate leadership, and waste and landfills. The pLAn sets targets of reducing greenhouse gas emissions below 1990 levels by a least 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050. With regard to transportation, the Project is consistent with the Plan's focus on reducing emissions from private vehicle use. Specifically, the site's infill location with immediate access to significant public transit, pedestrian, and bicycle facilities results in a transit-oriented development that will reduce auto dependence. Further, the Project is consistent with the Plan's land use policies that promote high density near transportation, transit-oriented development, and making underutilized land available for housing development, especially when near transit.

To reduce emissions from energy usage, the Proposed Project would be consistent with "pLAn" and its focus on increasing the amount of renewable energy provided by the Los Angeles Department of Water and Power; presenting a comprehensive set of green building policies to guide and support private sector development; and helping citizens to use less energy. Both construction and operational activities from the Project site would generate energy-related emissions that are reduced by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030. A list of specific energy efficiency and renewable energy features can be found in the Project Description on page II-8 and II-9.

With regard to water, the Proposed Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City's water and wastewater integrated resources plan that will increase conservation, and maximize the capture and

reuse of storm water. Specifically, the Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as CALGreen and City Green Building Code that call for water-conserving fixtures and processes. These elements of the Project would be consistent with goals set forth in the "pLAn".

With regard to waste, the Proposed Project would be consistent with the "pLAn" goal of increasing landfill diversion rate to at least 90 percent by 2025 and 95 percent by 2035. Operational efficiencies will be built into the Project that reduce energy use and waste, as mandated by the City's Green Building Code and CALGreen building code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Proposed Project would not interfere with "pLAn" and its focus on ensuring proportion of Angelenos living within 0.5 mile of a park or open space is at least 65 percent by 2025; revitalizing the Los Angeles River to create open space opportunities; and identifying promising locations for stormwater infiltration to recharge groundwater aquifers.

Consistency with the City of Los Angeles Green Building Ordinance

The Los Angeles Green Building Ordinance requires that all Projects filed on or after January 1, 2014 comply with the Los Angeles Green Building Code as amended to comply with the 2013 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include short and long term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Site, including installing ENERGY STAR rated appliances and installation of water-conserving fixtures. Therefore, the Project is consistent with the Los Angeles Green Building Ordinance.

The Proposed Project will comply with the City of Los Angeles' Green Building Ordinance standards that compel LEED certification, reduce emissions beyond a NAT scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development:

The Proposed Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level. Projects that are LEED certified generally exceed Title 24 (2013) standards by at least 10 percent.71 As such, it would incorporate several design elements and programs that will reduce the carbon footprint of the development, including:

1. **GHG Emissions Associated with Planning and Design.** The Project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. This would include:

    - Reduced parking based on compliance with the City's bicycle parking ordinance.

    - Access to several public transportation lines. This includes Los Angeles County Metropolitan Transportation Authority (i.e., Routes 237 and 656 on Highland Avenue, 212, 217, 222, and 312 on Hollywood Boulevard) and LADOT DASH Hollywood routes that provide opportunities to reduce GHG emissions from passenger vehicles.

    - Located near residential neighborhoods. The Project site's proximity to medium- and high-density residential neighborhoods increases the likelihood that more travel to and from the development will be made by non-motorized modes that will reduce potential GHG emissions.

2. **GHG Emissions Associated with Energy Demand.** The Project must meet Title 24 2013 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This includes:

    - Use of low-emitting paints, adhesives, carpets, coating, and other materials.

    - Equipment and fixtures will comply with the following where applicable:

        - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.

71 U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 February 26, 2015.

- Installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.
- Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
- Installed tank type water heaters will have an Energy Factor higher than .6.
- Installed tankless water heaters will have an Energy Factor higher than .80.
- Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
- Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

- An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system.
- A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.
- Appliances will meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

3. **GHG Emissions Associated with Water Use.** The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use. This would include:

- A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:

    - Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or

    - A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.

- When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads will not exceed specified flow rates.

- When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

    - Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;

    - Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).

4. **GHG Emissions Associated with Solid Waste Generation.** The Project is subject to construction waste reduction of at least 50 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. **GHG Emissions Associated with Environmental Quality.** The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other

requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:

- Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.

- Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the Project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the Project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

Cumulative Impacts

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as energy, mobile, and construction, would be covered by the Cap-and-Trade Program.

Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; AB 32, the 2016-2040 RTP/SCS and the City of Los Angeles Green Building Ordinance and Mobility 2035 Plan.

Implementation of the Project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from NAT and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the CARB's *Climate Change Scoping Plan* for the implementation of AB 32.

The Project is consistent with the approach outlined in CARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's *Climate Change Scoping Plan*, the Project would use "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen.

As part of SCAG's 2012–2035 SCS/RTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by CARB. The Project results in significant VMT reduction in comparison to NAT and would be consistent with the SCS/RTP.

The Project also would comply with the City of Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's regulatory compliance measures and project design features provided above and throughout this analysis would advance these objectives. Further, the related projects would also be anticipated to comply with many

of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code).

Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures throughout this analysis and project design features to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 33 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. The NAT comparison demonstrates the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap and Program, that Program will indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met.

Thus, given the Project's consistency with State, regional, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts would be cumulatively less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project would create a significant hazard though the routine transfer, use, or disposal of hazardous materials. Construction of the Proposed Project would involve the use of those hazardous materials that are typically necessary for construction of senior housing development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the Proposed Project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the Proposed Project would be required to implement standard best management practices (BMPs) set forth by the City and the Los Angeles Regional Water Quality Control Board (RWQCB) which would ensure that wastes generated during the construction process are disposed of properly. Therefore, the Proposed Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction and impacts would be less than significant.

The Proposed Project consists of the development of residential units, and a subterranean parking garage with landscaping. The types of potentially hazardous materials associated with operation of the Proposed Project include solvents, paints, petroleum products, and pesticides that are packaged and stored for consumer sales. However, materials would be used for facility upkeep that could be considered hazardous if used inappropriately. Such materials include cleaning solvents used for janitorial purposes, materials used for landscaping, and materials used for maintenance. Examples of such materials could include but are not limited to cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. All potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Project impacts related to this issue would be less than significant. No further analysis is required.

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

Less Than Significant Impact. As noted in the preceding section, compliance with federal, state, and local laws and regulations relating to transport, storage, disposal and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. A Phase I Environmental Site Assessment (ESA) completed for the Proposed Project Site, and included as **Appendix E** to this SCEA, found no evidence of Recognized Environmental Conditions (RECs), Historical RECs, Controlled RECs, or de minimis conditions in connection with the Project.[72] Neither is the site a Hazardous Waste / Border Zone Property, nor is it within a Methane Hazard zone.[73]

As previously discussed, no structures are located on the Project Site. Thus, exposure to asbestos containing materials and/or lead-based paints would not occur during demolition of the existing paving on the Project Site. Any alterations to the existing structure (Building A) during construction would be minor and adherence to all regulatory measures regarding the handling of lead-based paint would minimize the potential for exposure. Accordingly, any threat of upset or accidental release would be less than significant. No further analysis is required.

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

Less Than Significant Impact. Canyon Co-Op Pre-School, located at 1820 North Las Palmas Avenue, is 20 feet west of the Project Site. There are no other schools within 0.25 miles of the Project Site. Other schools in the area include the Larchmont Charter School located at 6611 Selma Avenue, approximately 0.36 miles south of the Project Site, and Hollywood High School located at 1521 N. Highland Avenue, approximately 0.5 miles southwest of the Project Site.

As previously discussed, construction of the Proposed Project would involve the use of those hazardous materials that are typically necessary for construction of senior housing development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the Proposed Project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related

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72 ***HUD Phase I Environmental Site Assessment of Montecito Apartments,*** *6650 Franklin Avenue, and 6668 Franklin Avenue, Los Angeles (Hollywood), California 90028, completed by EMG, dated October 29, 2014.*

73 *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed April 25, 2016.*

hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the Proposed Project would be required to implement standard BMPs set forth by the City and the RWQCB which would ensure that wastes generated during the construction process are disposed of properly.

The types of potentially hazardous materials associated with operation of the Proposed Project include solvents, paints, petroleum products, fertilizers, and pesticides that are packaged and stored for consumer sales. However, materials would be used for facility upkeep that could be considered hazardous if used inappropriately. Such materials include cleaning solvents used for janitorial purposes, materials used for landscaping, and materials used for maintenance. Examples of such materials could include but are not limited to cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. All potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment

As the Proposed Project will comply with all federal, state, and local standards and regulations, it is not anticipated to emit any hazardous emissions during construction or operation. Therefore, the Proposed Project is not expected to adversely affect Canyon Co-Op Pre-School, Larchmont Charter School or Hollywood High School facilities. Therefore, impacts would be less than significant and no further analysis is required.

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

No Impact. California Government Code Section 65962.5 requires various State agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.[74]

74 *These lists include, but are not limited to, the 'EnviroStor' (http://www.envirostor.dtsc.ca.gov/public/) and 'GeoTracker' (http://geotracker.waterboards.ca.gov/) lists maintained by the DTSC and the SWRCB, respectively.*

A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

During the preparation of the Phase I ESA, EMG obtained a regulatory database report from Environmental Data Resources, Inc. (EDR) to determine if the Project is a listed regulatory site.

The following are some of the databases which were reviewed for the Phase I ESA:

- **NPL Listing:** The National Priorities (Superfund) List (NPL) is United States Environmental Protection Agency (USEPA's) database of uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund Program.
- **Delisted NPL Listing:** The Delisted NPL database is a listing of sites which have been deleted from the NPL list by the USEPA.
- **RCRA-TSD Facilities Listing:** The USEPA's Resource Conservation and Recovery Act (RCRA) Program identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA-TSD database is a compilation by the USEPA of reporting facilities that transport, treat, store, or dispose of hazardous waste.
- **RCRA-Corracts Facilities Listing:** The USEPA's Resource Conservation and Recovery Act (RCRA) Corrective Action Sites Listing contains information pertaining to hazardous waste treatment, storage, and disposal facilities (RCRA TSD) which have conducted, or are currently conducting, a corrective action(s) as regulated under RCRA.
- **CERCLIS Listing:** This database is a compilation of sites which the USEPA has investigated or is currently investigating for a release or threatened release of hazardous substances.
- **NFRAP Listing:** This database contains information regarding sites which have been removed from the USEPA CERCLIS database.
- **RCRIS-Generator Listing:** The USEPA identifies and tracks hazardous waste from the point of generation to the point of disposal through the Resource Conservation and Recovery Information System (RCRIS). The RCRIS-Generators database is a compilation by the USEPA of facilities that report hazardous waste generation.

- **Emergency Response Notification System (ERNS):** The ERNS is a national database used to collect information on reported releases of oil or hazardous substances.
- **Federal institutional control registry:** This database contains information on sites with federal institutional controls.
- **Federal engineering control registry:** This database contains information on sites with federal engineering controls.
- **EnviroStor (SHWS):** The Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfield Reuse Program (SMBRP) EnviroStor database identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes the following site types: Federal Superfund sites (NPL); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides similar information to the information that was available in CalSites, and provides additional site information, including, but not limited to, identification of formerly-contaminated properties that have been released for reuse, properties where environmental deed restrictions have been recorded to prevent inappropriate land uses, and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites. The CalSites listing is no longer updated by the state agency. It has been replaced by EnviroStor.
- **SLIC:** The California Spill, Leak, Investigation, and Cleanup (SLIC) database is maintained by the individual California Regional California Water Quality Control Boards (RWQCB) to track sites where releases have been reported outside of the Leaking Underground Storage Tank program. These sites typically include miscellaneous releases, not necessarily related to underground storage tanks.
- **SWF Listing:** This database is a comprehensive listing of all State Permitted Solid Waste Landfills.
- **Leaking Underground Storage Tanks:** This database contains a summary of information pertaining to leaking underground storage tank (LUST) sites identified by the state.
- **Underground Storage Tanks:** This database contains a summary of information pertaining to registered underground storage tanks (USTs) identified by the state.
- **State Voluntary Cleanup Sites**: This database contains a listing of sites which are in the State voluntary cleanup program

- **Tribal Voluntary Cleanup Sites**: This database contains a listing of sites which are in the Tribal voluntary cleanup program
- **Tribal LUST:** This database contains information on Tribal LUST sites.
- **Tribal UST:** This database contains information on Tribal UST sites.

A complete copy of the regulatory database report is included the Appendices of the Phase I ESA, Section 9.

Based on review of the regulatory database report, and by cross-referencing name, address, and zip code, EMG was able to conclude that the Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. No further analysis is required.

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

No Impact. The Project Site is not located within an airport land use plan or within the vicinity of a public airport or private airstrip. The nearest public airport is the Bob Hope Hope/Burbank Airport, located approximately 6.5 miles north of the Project Site. Los Angeles International Airport is approximately 12 mile southwest of the Project Site. The Santa Monica Airport, a private airport is located approximately 9.1 miles southwest of the Project Site. Therefore, no impact would result in a safety hazard for people residing or working within an airport land use plan would occur. No further analysis is required.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. See response to **Section 8(e)**, above. No further analysis is required

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Hollywood Boulevard, Highland Avenue, and the Hollywood (US 101) Freeway are designated disaster routes in the General Plan Safety Element's Critical Facilities & Lifeline Systems Map (Exhibit H).[75] Disaster routes

75 *City of Los Angeles City Planning Department, Environmental and Public Facilities Maps, Critical Facilities & Lifeline Systems in the City of Los Angeles, September 1996,(General Plan Safety Element, Exhibit H: Critical Facilities & Lifeline Systems, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf).*

function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. The Safety Element emphasizes immediate emergency debris clearance and road/bridge repairs for short-term emergency operations along these routes.

Although the Project Site is located proximate a designated disaster route, neither the construction nor the operation of the Proposed Project would require or result in modifications to any of the roadways that would impact emergency traffic. Construction of the Proposed Project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan**,** and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response and access during construction of the Proposed Project. The majority of construction activities for the Proposed Project would be confined to the site, except for infrastructure improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods.

The existing driveway along Cherokee Avenue would remain for the resident and visitor access to the parking garage; the design of the Proposed Project would not cause any alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. In addition, the Applicant will submit a parking and driveway plan for review by the Los Angeles Fire Department (LAFD), the Bureau of Engineering (BOE) and the Los Angeles Department of Transportation (LADOT) to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access.

Therefore, demolition, construction and operation of the Proposed Project is not anticipated to significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan, and the Proposed Project would have a less than significant impact with respect to these issues. No further analysis is required.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less Than Significant Impact. The Project Site is located in an urbanized area that does not contain any wildlands or urbanized areas intermixed with wildlands. The Project

Site is not located within a City designated Fire Hazardous Area[76] Further, the project would incorporate all applicable provisions of the LAMC Fire Code, including, but not limited to, installation of an automatic sprinkler system, smoke detectors, and a fire alarm system. Therefore, potential impacts from wildland fires would be less than significant. No further analysis is required.

76 *City of Los Angeles, Department of Public Works, Bureau of Engineering, NavigateLA, http://navigatela.lacity.org/navigatela/, accessed September 8, 2017.*

9. HYDROLOGY AND WATER QUALITY

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the United States Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the SWRCB administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the RWQCB to preserve, protect, enhance, and restore water quality.

A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As required under the NPDES, the Proposed Project would be responsible for the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality.

During the operation, the Proposed Project would be required to comply with the City of Los Angeles's Low Impact Development (LID) Ordinance (No. 181,899) that was adopted by the Los Angeles Board of Public Works on July 1, 2011 and by the Los Angeles City Council on September 27, 2011; it became effective on May 12, 2012.

The LID Ordinance applies to all development and redevelopment in the City of Los Angeles that requires a building permit. The Ordinance requires the preparation of a LID Plan and a Standard Urban Stormwater Mitigation Plan (SUSMP) if necessary. The LID Ordinance requires projects to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment priorities. Full compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure that the operation of the Proposed Project would not violate any water quality standards and discharge requirements or otherwise substantially degrade water quality. If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032 National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. The Proposed Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe). Therefore, the project would result in a less than significant impact to water quality and waste discharge during its construction and operation, and no further analysis is required.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. A significant impact would occur if the Proposed Project substantially depleted groundwater or interfered with groundwater recharge.

The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including water supplied by the Metropolitan Water District (MWD) (53 percent; Bay Delta 45 percent, Colorado River 8 percent), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (34 percent), local groundwater (12 percent), and recycled water (1 percent).[77] Based on the City's most current Urban Water Management Plan

[77] *Los Angeles Department of Water and Power - Water: Facts and Figures, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=18i8d8hpzl_21&_afrLoop=430938015435485 , access April 25, 2016.*

(UWMP)[78], in 2011-2014 the LADWP has an average a water demand of 566,990 acre-feet[79] per year. Over the last five years, groundwater, largely from the San Fernando Basin (SFB) has provided approximately 12 percent of the total water supply for Los Angeles. Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins found primarily in the San Fernando Valley.

The Project Site is currently developed with a surface parking lot and an open courtyard and thus does not afford any opportunity for groundwater recharge activities. Following site redevelopment, groundwater recharge on the Project Site would continue to be negligible, similar to existing conditions.

As reported in the Geology Report, the historically-highest groundwater level at the site was on the order of 25 feet below ground surface (bgs). The Proposed Project would excavate soils beneath the Project Site to a depth of approximately 40 feet bgs. As such, the Proposed Project may extend into the groundwater table. The project would be required to comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the RWQCB at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. Any groundwater extracted from the Project Site would need to be treated, if warranted, prior to being discharged into the sanitary sewer. Therefore, the Proposed Project's potential impacts relating to dewatering would be less than significant.

Impacts related to groundwater supplies would be less than significant. No further analysis is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

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78 *An UWMP is prepared and adopted by LADWP every five years to forecast the future water demands and water supplies under average and dry year conditions. LADWP is currently in the process of preparing the 2015 UWMP, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18i8d8hpzl_21&_afrLoop=431238281039535, https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB456809&RevisionSelectionMethod=LatestReleased, accessed April 25, 2016.*

79 *One acre foot equals 325,851 gallons of water.*

Less Than Significant Impact. A significant impact would occur if the Proposed Project substantially altered the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site.

The Project Site is located in a highly urbanized are within the City of Los Angeles. There are no natural watercourses on the Project Site or in the vicinity of the Project Site. As stated previously, the Project Site is almost entirely covered by impervious surfaces and current stormwater runoff flows to the local stormdrain system during a storm event.

The project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction the Proposed Project. Further, the project would be required to implement an LID Plan (during the project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater best management practices to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Therefore, the project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site. No further analysis is required.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. As discussed above under **Section 9(c)**, implementation of the Proposed Project is not anticipated to substantially change the drainage pattern on the Project Site. As discussed above, the project would implement both a SWPPP and an LID Plan and would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or –off-site. Further, there are no nearby streams or rivers and the Proposed Project could not alter any watercourse. As such, impacts would be less than significant and no further analysis is required.

e) 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?

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable

NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

Construction-Related Project Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the Proposed Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Operation-Related Project Impacts

Activities associated with operation of the Proposed Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the Proposed Project must

comply with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles, the SWRCB, and the Proposed Project's approved LID Plan. Compliance with existing regulations and the approved LID Plan would reduce the potential for the Proposed Project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level. No further analysis is required.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality.

Other than the sources discussed above, as described in Sections 9(a) and 9(e), the project does not include other potential sources of contaminants which could potentially degrade water quality.

Further, as previously discussed, to address water quality during the project's construction phase, the Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City of Los Angeles Bureau of Engineering (BOE) for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, project construction impacts related to water quality would be less than significant, and no further analysis of this issue is required.

During the Project's operational phase, in accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the project would meet the City's water quality standards. Therefore, project impacts related to operational water quality would be less than significant. No further analysis is required.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Less Than Significant Impact. The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk**.** The Project Site is in an area of minimal flood risk (Zone X) and is not located within a 100-year flood zone, as mapped by FEMA.[80] Therefore, the Proposed Project would not involve the development of new housing and/or structures within an identified 100-year flood hazard. Impacts would be less than significant and no further analysis is required.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Less Than Significant Impact. See response to **Section 9(g)**, above. Impacts would be less than significant and no further analysis is required.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. A significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

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80 As per *FEMA Flood Insurance Rate Map No. 06037C1590F, effective as of 09/26/2008, accessed April 25, 2016. The map can be accessed by following the directions provided through this portal: https://msc.fema.gov/portal.*

The Project Site is not located within a potential inundation area.[81] As such, there would be no impacts related to potential inundation from the failure of a levee or dam.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is a periodic oscillation of a body of water resulting from seismic shaking or other causes that can cause flooding. The Project Site is not located within a coastal area, and no water bodies are on or adjacent to the project area that would impact future projects due to a seiche. Impacts would be less than significant.

A tsunami is a series of waves generated by large earthquakes that create vertical movement on the ocean floor. Tsunamis can reach more than 50 feet in height, move inland several hundred feet, and threaten life and property. Often, the first wave of a tsunami is not the largest. Tsunamis can occur on all coastal regions of the world, but are most common along margins of the Pacific Ocean. Tsunamis can travel from one side of the Pacific to the other in a day, at a velocity of 600 miles an hour in deep water. A locally generated tsunami may reach the shore within minutes. Due to its inland location, the Project Site is not susceptible to tsunamis.[82] Impacts would be less than significant in this regard.

In addition, given the developed nature of the project area, there are no features adjacent to the project area capable of inundating the site by mudflow. Thus, no impacts are anticipated with regard to the inundation by seiche, tsunami, or mudflow. No further analysis is required.

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81 As per *FEMA Flood Insurance Rate Map NO. 06037C1590F, effective as of 09/26/2008, accessed April 25, 2016. The map can be accessed by following the directions provided through this portal: https://msc.fema.gov/portal.*

82 *City of Los Angeles Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

10. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

Less Than Significant Impact. The Project Site is located at 6650 West Franklin Avenue[83] in the Hollywood Community Plan Area, as established by the City's General Plan. The Project Site is currently developed with a surface parking lot and an open courtyard.

The Project Site is located two blocks south of Hollywood Boulevard, and Highland Avenue is two blocks to the west. The site is approximately 0.4 miles west of U.S. Highway 101 (US 101). The land uses within the general vicinity of the Project Site are characterized by a mix of medium to high-intensity residential and commercial uses. The infill project would develop the 0.78-acre site with a senior housing project consisting of a 68 residential units.[84] The project is an infill development in an area with a mix of uses, and would not physically divide an established community. Impacts would be less than significant and no further analysis is necessary.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The Project Site is zoned [Q]R4-2 (High Density Residential). The General Plan land use designation for the Project Site is High Density Residential. The (draft) Hollywood Community Plan includes several goals, objectives, and policies that would be applicable to the Proposed Project.

The current zoning permits by-right uses and area limitations consistent with the R4 Zone and a maximum Floor Area Ratio of 6:1. Pursuant to the Q condition established by Ordinance No. 165,656 the density and height of the underlying R4 zoning is restricted to 1 unit per 600 square feet of lot area and a maximum height of 60 feet. With a grade change of more than 20 feet, the Project is permitted an additional 12 feet in height for a maximum height of 72 feet. As such, in order to implement the Proposed Project per the current plans, the Applicant is requesting the following entitlements:

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83 Additional addresses affiliated with the Project Site include 6669 West Franklin Avenue and 1855 North Cherokee Avenue

84 There would be a total of 67 new senior housing units and one unit set aside for an on-site manager.

- A **Density Bonus** (DB) pursuant to CA Government Code Section 65915(f)(3) and LAMC Section 12.22.A.25 to permit a Senior Residential Housing Development Project with 118 existing non-conforming units and 68 new units, dedicating 99% of proposed units restricted to Low and Very Low Income Households in exchange for the following incentives:

    - An **On-Menu Incentive** for an increase in height to permit a new building with 76-feet, 8-inches in height in lieu of the otherwise permitted 72-foot height limit pursuant to Ordinance 165,656 and LAMC 12.21.1 B.2 for a site with more than 20 feet of grade change;

    - An **Off-Menu Incentive** for a decrease in yards to permit a 4-foot, 6-inch northerly side yard fronting Franklin Boulevard in lieu of the otherwise required 9-foot front yard for a 6-story building pursuant to LAMC 12.11 C.2;

    - An **Off-Menu Incentive** for a decrease in yards to permit a 10-foot rear yard in lieu of the otherwise required 18-foot rear yard for a 6-story building pursuant to LAMC 12.11 C.3;

- A **Conditional Use Permit** (CUP) to permit pursuant to 12.24 U.26, to permit a housing development project with a density increase greater than the maximum permitted in LAMC 12.22 A.25, for a total of 186 units;

- A **Site Plan Review** (SPR) pursuant to LAMC 16.05 C, to permit the construction, use, and maintenance of more than 50 new residential units;

- A **Preliminary Parcel Map** (PMLA) pursuant to LAMC 17.50, a to permit the merger and re-subdivision of five (5) ground lots into one (1) ground lot and two (2) air space lots;

- Adoption of the **Sustainable Communities Environmental Assessment** (SCEA); and

- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

As discussed below, following the granting of the above-mentioned entitlements, the Proposed Project would substantially conform with the purpose, intent and provisions of the General Plan, and the Hollywood Community Plan, there would be no conflicts with any applicable land use plan, policy, or regulation, and impacts would be less than significant.

CITY OF LOS ANGELES GENERAL PLAN

Framework Element

Policy 3.1.4: *Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram (Figures 3-1 to 3-4) and Table 3-1.*

According to the General Plan Framework Long-Range Land Use Diagram for the Metro Subarea (Figure 3-1), the Project site is located in or adjacent to a designated Regional Center around the intersection of Hollywood Boulevard and La Brea Avenue. Residential development in proximity of these Regional Centers will shorten and lessen the need for vehicle trips and vehicle miles traveled. Thus, the Project is consistent with Policy 3.1.4 of the General Plan Framework.

Furthermore, Chapter 4 outlines Goals, Objectives and Policies with regard to Housing in the City of Los Angeles:

Goal 4A: *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

Objective 4.1: *Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City sub-region to meet the projected housing needs by income level of the future population to the year 2010.*

Policy 4.1.1: *Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City sub-region to meet the twenty-year projections of housing needs.*

Policy 4.1.6*: Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City.*

Housing Element

The Housing Element of the General Plan provides land use policies and programs that encourage development of affordable housing across the City. The Project is consistent with the following policies of the Housing Element of the General Plan:

Goal 1: *A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.*

The fastest growing age group aligns broadly with the "baby boom" generation, which is currently between about 45 and 65 years old. There are about 190,000 more people in the City within this age group, compared to 10 years ago. In fact, the number of "new seniors" (from 2000 to 2010) increased faster in the Los Angeles region than New York or any other metropolitan area[85] (p. 1-5).

According to demographers, the next decade will be marked by growth of households without children, primarily by those headed by householders aged 55 and older[86]. While the City's overall population is projected to increase by about 4.5% between 2010 and 2020, its senior population (65 and older) is expected to grow by approximately 45% percent during this time period (to approximately 562,992)[87]. By 2020, seniors are expected to account for more than 14% of the City's households, compared to 10.5% in 2010. This far exceeds the growth of any other age groups in the City. The increasing numbers of older Angelenos will have important effects on the demand for housing to come (p.1-6).

Older adults over the age of 65 own their homes at the highest rate of any age group (58%).[88] While most are likely to want to stay in their homes as long as they can, many older adults may seek out alternative housing options. When seniors move, they are most likely to move into rental apartments. Statewide projections for California indicate that, of those turning 65 in 2011, approximately 60% will have moved into apartments

85 Referenced in the Housing Element: Mcllwain, John K "Seniors: In Which Metro Region are They Living?" Urban Land Institute, February 23, 2012 http://urbanland uli org/ Articles/2012/Feb/McIlwainSeniors1

86 Referenced in the Housing Element: Nelson, Arthur C "The New California Dream: How Demographic and Economic Trends May Shape the Housing Market," Urban Land Institute, Washington DC (2011)

87 Referenced in the Housing Element: Economic Roundtable "Affordable Housing Benefit Fee Study" (2011) Underwritten by the HCIDLA and DCP

88 Referenced in the Housing Element: U S Census Bureau 2010 Census, Tenure by Age of Householder SF1

by 2029.[89] The additional demand placed on the City's rental stock by the aging population will be highly significant. (p. 1-18)

Seniors should have options allowing them to live in the most integrated setting possible. To provide for this, a full spectrum of affordable housing is needed, from conventional residences to transitional and permanent supportive housing, including group, congregate and independent housing. Independent, supported living in the most integrated setting possible is preferable, either through individual or shared single-family homes or apartments, providing each individual with his/her own bedroom and optional access to support services and auxiliary amenities. Persons who use wheelchairs need affordable, conveniently-located housing which has been specially adapted for wheelchair accessibility, along with other physical needs (p. 1-22). The Project seeks to provide these options, by expanding the number of affordable units for seniors and augmenting the existing Montecito Senior Apartments.

HOLLYWOOD COMMUNITY PLAN

The Site is designated High Density Residential by the Hollywood Community Plan. The Project advances a number of specific goals and objectives of the Community Plan:

HOUSING. *The intensity of residential land use in this Plan and the density of the population which can be accommodated thereon shall be limited in accordance with the following criteria:*

1. ***The adequacy of the existing and assured circulation and public transportation systems within the area;***

Complies. As an infill development site, the property has outstanding access to community resources, particularly public transportation. The site is serviced by the DASH Hollywood line, directly abutting the property. Additionally, there are several major bus routes running along Franklin Avenue, Highland Avenue, Hollywood Boulevard, and Cahuenga Boulevard. The Project Site is less than one-half mile from the Hollywood/Highland Station of the Metro Red Line. The Project Site's proximity to Highway 101, Hollywood Boulevard, and Highland Avenue also ensures adequate access to arterials roads and freeways for regional vehicular travel.

89 Referenced in the Housing Element: Nelson, Arthur C "The New California Dream: How Demographic and Economic Trends May Shape the Housing Market," Urban Land Institute, Washington DC (2011)

2. The availability of sewers, drainage facilities, fire protection services and facilities, and other public utilities;

Complies. As an infill development site, the property has existing connections to sewer and drainage facilities, and is served by Los Angeles Fire Department, Fire Station 27 (1327 Cole Avenue – 1.0 miles from Project Site) and the Los Angeles Police Department, Hollywood Division (1358 N. Wilcox Avenue – 0.9 miles from Project Site).

3. The steepness of the topography of the various parts of the area, and the suitability of the geology of the area for development.

Complies. The Project Site is located on a sloping site improved with an existing residential building and surrounding by other multi-family residential buildings and is therefore suitable for the development of multi-family residential uses. A full seismic hazard study has been conducted on the site including trenching required for a project in an Alquist-Priolo Zone and has cleared the Project Site for development by LADBS.

Additional low and moderate-income housing is needed in all parts of this Community. Density bonuses for provision of such housing through Government Code 65915 may be granted in the Low-Medium I or less restrictive residential categories.

Complies. The Proposed Project is in an area designated for High Density Residential uses and surrounding by other medium- and high-density residential development. The Proposed Project is using Government Code 65915 to achieve development waivers that will produce 67 new affordable senior housing units in the Hollywood Community Plan Area.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As previously stated in **Section 4, Biological Resources**, the Project Site is not located with the confines of a Habitat Conservation Plan, Natural Community Conservation Plan, or SEA. Therefore, the Proposed Project would not conflict with the provisions of an applicable habitat conservation plan or natural community conservation plan. No impacts would occur, and no further analysis is required.

11. MINERAL RESOURCES

Would the project:

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

No Impact. The Project Site subject to the applicable land use and zoning requirements in the LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code), it is subject to development standards for the various districts in the City of Los Angeles. The Project Site is zoned [Q]R4-2, and thus is not zoned for oil extraction and drilling, or mining of mineral resources[90], and there are no such sites at the Project Site. Further, the Project Site is not located in an identified Mineral Resource Zone in the City of Los Angeles General Plan Conservation Element.[91]

The project would involve the development of an age-restricted residential building, and would not involve any new oil or mineral extraction activities. Therefore, development of the project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Thus, no impact associated with mineral resources would occur.

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

No Impact. See response to **Section 11(a)**, above.

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90 *Sites with known mineral resources are generally known as Mineral Resource Zones (MRZ), as classified by the California Geologic Survey (CGS).*

91 *City of Los Angeles, Conservation Element Exhibit A Mineral Resources Map, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf.*

12. NOISE

Introduction to Noise

Characteristics of Sound

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. **Table V-15, A-Weighted Decibel Scale** provides examples of A-weighted noise levels from common sources.

Table V-15
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35

Source: United States Occupational Safety & Health Administration, Noise and Hearing Conservation Manual, 1999.

Noise Definitions

This noise analysis discusses sound levels in terms of Equivalent Noise Level (L_{eq}) and Community Noise Equivalent Level (CNEL).

Equivalent Noise Level

L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period. L_{eq} is expressed in units of dBA.

Community Noise Equivalent Level

CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 PM and 10:00 PM is as if it were actually 5 dBA higher than had it occurred between 7:00 AM and 7:00 PM From 10:00 PM to 7:00 AM, humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 PM and 10:00 PM and 10 dBA to nighttime noise levels between 10:00 PM and 7:00 AM Because of this, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Effects of Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.[92] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[93]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA L_{eq}, and that individual noise events of 45 dBA or higher be limited.[94] Assuming an exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA L_{eq}. Individual exterior events of 60 dBA or higher should also be limited.

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65-70 dBA L_{eq} and cardiovascular effects including ischaemic heart disease and hypertension. However at this time, the relationship is largely inconclusive.

92 National Institute on Deafness and Other Communication Disorders, www.nidcd.nih.gov/health/noise-induced-hearing-loss.

93 World Health Organization, Guidelines for Community Noise, 1999.

94 Ibid.

Audible Noise Changes

People with normal hearing sensitivity can recognize small perceptible changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable and may cause community reactions. Sound level increases of 10 dBA or greater are perceived as a doubling in loudness and can provoke a community response.[95]

Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources, commonly referred to as "point sources," can decrease by approximately 6 dBA over hard surfaces (i.e., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (i.e., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet and over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels allowing noise to reach receivers by diffraction only. As a result, sound barriers can reduce source noise levels by up to 20 dBA.[96] However, the effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Regulatory Framework

Federal

Currently, no federal noise standards regulate environmental noise associated with short-term construction activities or the long-term operations of development projects. As such, temporary and long-term noise impacts produced by the Project would be largely regulated by and evaluated with respect to State and City of Los Angeles standards designed to protect public well-being and health.

95 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.

96 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

Table V-16
State of California Noise/Land Use Compatibility Matrix

Land Use Category	Community Noise Exposure (dB, L_{dn} or CNEL)						
	55	60	65	70	75	80	
Residential - Low Density Single-Family, Duplex, Mobile Homes							
Residential - Multi-Family							
Transient Lodging - Motels Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.

Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Planning and Research, General Plan Guidelines - Noise Element Guidelines (Appendix C), 2003.

State

State of California 2003 General Plan

The State's 2003 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. **Table V-16, State of California Noise/Land Use Compatibility Matrix,** illustrates State compatibility considerations between various land uses and exterior noise levels.

City of Los Angeles

Los Angeles Municipal Code

The City of Los Angeles Municipal Code (LAMC) contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations. Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 PM and 7:00 AM, Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 AM or after 6:00 PM on any Saturday, or on any Sunday or national holiday.

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

(a) No person shall, between the hours of 9:00 PM and 7:00 AM of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 AM or after 6:00 PM on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site

delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance to Project construction would be subdivision (a), which institutes a maximum noise limit of 75 dBA for the types of construction vehicles and equipment that would be necessary for Project demolition and grading, especially. However, the LAMC goes on to note that these limitations would not necessarily apply if proven that the Project's compliance therewith would be technically infeasible despite the use of noise-reducing means or methods.

SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 AM and 10:00 PM, in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the Project's property line.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Section 112.02(a), below, would prevent Project HVAC systems and other mechanical equipment from elevating ambient noise levels at neighboring residences by more than 5 dBA.

SEC.112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

(a) It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property … to exceed the ambient noise level by more than five decibels.

L.A. CEQA Thresholds Guide

In 2006, the City released the L.A. CEQA Thresholds Guide to provide further guidance for the determination of significant construction and operational noise impacts. According to the Guide, a Project would, under normal circumstances, have a significant impact if:

- *Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;*
- *Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or*

- *Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.*

For a Project's operational impacts:

- *The ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category…*

- *Any 5 dBA or greater noise increase.*

These "normally unacceptable" and "clearly unacceptable" categories refer to those outlined by the State's noise and land-use compatibility chart, shown in **Table V-16**.

Thresholds of Significance

Would the project would result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact with Mitigation.

Existing Conditions

The Project site is surrounded primarily by multi-family land uses to the north, east, and south. West of the Project site is a school and senior citizen center. According to the L.A. CEQA Thresholds Guide, land uses sensitive to noise include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The following receptors were chosen specifically for detailed construction noise impact analysis given their potential sensitivities to noise and their proximity to the Project site:

<u>Canyon Co-Op School</u>

This school is located at 1820 N. Las Palmas Avenue, west of the Project site and near the intersection of Franklin Avenue and Las Palmas Avenue.

<u>Las Palmas Senior Citizen Center</u>

This receptor is also located at 1820 N. Las Palmas Avenue.

Franklin Avenue Residences

These multi-family residential receptors are located north of the Project site along Franklin Avenue.

Cherokee Avenue Residences

These multi-family residential receptors are located to the south and east of the Project site along Cherokee Avenue.

Short-term noise readings were taken at locations surrounding the Project site to help determine these receptors' ambient noise conditions. For all noise monitoring locations, ambient noise was primarily attributable to vehicle traffic along Franklin Avenue. Ambient noise levels for all Project receptors are shown in **Table V-17, Existing Ambient Noise Levels** for reference.

Table V-17
Existing Ambient Noise Levels

Sensitive Receptor	Existing Ambient Noise Level (dBA L_{eq})
Canyon Co-Op School	66.7
Las Palmas Senior Citizen Center	66.7
Franklin Avenue Residences	66.3
Cherokee Avenue Residences	59.5
Valle Verde Courtyard Mobile Home Park	50.0
Source: DKA Planning, 2016, Appendix F	

Construction

During all construction phases, noise-generating activities could occur at the Project site between the hours of 7:00 AM and 9:00 PM Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On-site activities could include the use of heavy equipment such as excavators and loaders, as well as smaller equipment such as saws, hammers, and pneumatic tools. Off-site secondary noises could be generated by sources such as construction worker vehicles, vendor deliveries, and haul trucks.

Noises from demolition and grading activities are typically the foremost concern when evaluating a project's construction noise impacts, as these activities often require the use of heavy-duty, diesel-powered earthmoving equipment. The types of heavy equipment required for these activities may include excavators, bulldozers, front-end loaders, graders, backhoes, and scrapers.

For this Project, demolition and grading noise impacts were modeled using the noise reference levels of excavators and front-end loaders, as these vehicles would be utilized extensively to demolish and grade for the Project. Excavators can produce average peak noise levels of 81 dBA at a reference distance of 50 feet; front-end loaders, 79 dBA.97 Compounding their noise impacts is the fact that these vehicles commonly operate in tandem. Excavators remove soils and demolished materials, and front-end loaders transport this matter to on-site stockpiles or haul trucks for off-site export. As a result, excavators and front-end loaders have the greatest potential to cause sustained and significant noise impacts at nearby receptors. The impacts of other construction equipment and vehicles would be neither as loud nor as extensive over the duration of the Project's demolition, grading, and other phases. Therefore, this analysis examines a worst-case-scenario; the noise impacts of all other construction equipment and phases would not exceed the impacts analyzed here. The projected noise impact from excavators and front-end loaders are shown in **Table V-18, Construction Noise Levels - Unmitigated** and summarized below.

Table V-18
Construction Noise Levels - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Canyon Co-Op School	50	74.1	66.7	74.9	8.2
Las Palmas Senior Citizen Center	15	74.1	66.7	74.9	8.2
Franklin Avenue Residences	80	75.1	66.3	75.6	9.3
Cherokee Avenue Residences	5	79.1	59.5	79.2	19.7

Source: DKA Planning, 2016. Appendix F

Canyon Co-Op School

This school is projected to experience exterior noise levels of up to 74.9 dBA as a result of the Project's demolition and grading activities, an increase of 8.2 dBA over existing ambient noise conditions. This would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

97 Federal Highway Administration, Construction Noise Handbook, 2006.

Las Palmas Senior Citizen Center

This receptor is projected to experience exterior noise levels of up to 74.9 dBA as a result of the Project's demolition and grading activities, an increase of 8.2 dBA over existing ambient noise conditions. This would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

Franklin Avenue Residences

These receptors are projected to experience exterior noise levels of up to 75.6 dBA as a result of the Project's demolition and grading activities, an increase of 9.3 dBA over existing ambient noise conditions. This would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

Cherokee Avenue Residences

These receptors are projected to experience exterior noise levels of up to 79.2 dBA as a result of the Project's demolition and grading activities, an increase of 19.7 dBA over existing ambient noise conditions. This would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

As discussed above, Canyon Co-Op School, Las Palmas Senior Citizen Center, Franklin Avenue Residences, and Cherokee Avenue Residences could all experience construction-related noise increases in excess of 5 dBA. However, these noise increases could be reduced to below 5 dBA by the use of temporary noise barriers and other methods. Additionally, construction equipment source noise levels for excavators and front-end loaders would exceed LAMC Section 112.05's 75 dBA limit for powered construction equipment operating within 500 feet of residential zones. This impact could also be reduced by the use of temporary noise barriers and other methods. As a result, the Project's construction noise impact would be considered significant but mitigable. Mitigation Measures **NOI-MM-1** through **NOI-MM-3** are recommended to reduce the Project's contribution to off-site increases in noise levels and limit construction source noise levels to below 75 dBA.

With regard to off-site construction-related noise impacts, grading activities would necessitate an estimated 25 haul trips per work day to export excavated soils from the

Project site to regional landfills. While this vehicle activity would marginally increase ambient noise levels along the haul route, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any noise sensitive land uses. According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant. Though the addition of haul trucks would alter the fleet mix of the Project haul route, their minimal addition to local roadways would not nearly double those roads' traffic volumes, let along augment their traffic to levels capable of producing 5 dBA ambient noise increases. As a result, off-site construction noise impacts related to haul trips would be considered less than significant.

Mitigation Measures **NOI-MM-1** through **NOI-MM-3** would reduce the Project's construction-related ambient noise level increases to below thresholds of significance at Canyon Co-Op School, Las Palmas Senior Citizen Center, Franklin Avenue Residences, and Cherokee Avenue Residences. These measures would also reduce the Project's on-site construction source noises to below the LAMC's 75 dBA limit for powered equipment operations within 500 feet of residential zones.

Table V-19
Construction Noise Levels - Mitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, Leq)	New Ambient (dBA, Leq)	Increase
Canyon Co-Op School	50	61.1	66.7	67.8	1.1
Las Palmas Senior Citizen Center	15	66.1	66.7	69.4	2.7
Franklin Avenue Residences	80	62.1	66.3	67.7	1.4
Cherokee Avenue Residences	5	61.1	59.5	63.4	3.9

Source: DKA Planning, 2016.Appendix F

Operation

During Project operations, the development would produce noise from both on- and off-site sources. The direct on-site sources would include the following:

Mechanical Equipment

Regulatory compliance with LAMC Sec.112.02 would ultimately ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this

regulation, ambient noise levels, and the relatively quiet operation of modern HVAC systems, these on-site noise sources would not be capable of causing the ambient noise levels of nearby uses to increase by 3 dBA CNEL to or within their respective L.A. CEQA Thresholds Guide's "normally unacceptable" or "clearly unacceptable" noise categories, or by 5 dBA or greater overall.

Residential Land Uses

Noise from recurrent activities (e.g., conversation, consumer electronics, dog barking) and non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to differing degrees. The City's noise ordinance would provide a means to address nuisances related to residential noises.

Auto-Related Activities

Operational noises related to the proposed onsite parking would include intermittent noise events such as door slamming and vehicle engine start-ups. However, these noise events are infrequent and do not substantially increase ambient noise levels, especially considering that the Project is located along a thoroughfare in an area with many similar types of multi-family residential land uses with their own auto-related noises. Furthermore, the majority of the Project's parking would be underground. Noises from the Project's underground parking level would be inaudible, or at the very least considerably attenuated, at nearby receptors. And as the Project's ground level parking would be internal and covered, noises from this parking area would similarly be either inaudible or greatly reduced. Existing parking spaces to remain as a part of the proposed Project would not contribute to increases in ambient noise.

The impact potential of these on-site operational noise sources would be considered less than significant.

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with its net new daily trips. On a typical weekday, the Project is forecast to generate an estimated 14 new AM peak hour trips and 17 new PM peak hour trips.[98] These vehicle trips would not be capable of doubling the traffic volumes of any nearby roadway, and no roadway segment would experience a noise increase of at least 3 dBA as a result. These additional trips would have a nominal impact on surrounding

98 Linscott, Law & Greenspan, Engineers; Technical Memorandum – Montecito Senior Housing Project; October 2016.

roadways. The Project's off-site operational noise impact would be considered less than significant.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact.

Introduction to Vibration

Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

Vibration Definitions

This noise analysis discusses vibration in terms of Peak Particle Velocity (PPV).

Peak Particle Velocity

PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.[99]

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can disrupt concentration or disturb sleep. Ground-borne vibration can also interfere with certain types of highly sensitive equipment and machines, especially imaging devices used in medical laboratories.

99 California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, approximately 0.01 inches per second.[100] Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of ground-borne vibration include construction equipment, trains, and traffic on rough or unpaved roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

Regulatory Framework

Federal

For the evaluation of construction-related vibration impacts, state standards set by the California Department of Transportation (Caltrans) are used given the absence of Federal, County, and City standards specific to construction activities.

California Department of Transportation

In 2013, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Guidance Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. **Table V-20, Caltrans Building Damage Vibration Guidelines** summarizes Caltran's vibration guidelines for building and structural damage.

100 Ibid.

Table V-20
Caltrans Building Damage Vibration Guidelines

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous / Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: California Department of Transportation, 2013.

Construction

As discussed earlier, construction of the proposed Project would require equipment such as excavators and loaders. These types of heavy-duty vehicles can produce peak vibration velocities of up to 0.089 inches per second at a distance of 25 feet.[101] **Table V-21, Building Damage Vibration Levels at Off-Site Structures – Unmitigated**, shows the Project's projected construction vibration impacts at the nearest off-site structures. No receptor would experience potentially damaging levels of ground-borne vibration from the Project's construction activities. As a result, the Project's construction vibration impacts would be considered less than significant.

Table V-21
Building Damage Vibration Levels at Off-Site Structures - Unmitigated

Off-Site Structures	Distance to Project Site (ft.)	Estimated PPV (in/sec)	Structural Significance Threshold (in/sec)	Significant?
Canyon Co-Op School	50	0.045	0.5	No
Las Palmas Senior Citizen Center	15	0.148	0.5	No
Franklin Avenue Residences	80	0.028	0.5	No
1847 N Cherokee Avenue Residences	5	0.445	0.5	No

Source: DKA Planning 2016.Appendix F

Note: On-Site sensitive receptors could be as close as a similar distance to the receptors at 1847 N Cherokee. Although on-site receptors are not required to be analyzed under CEQA, the impacts at these receptors would be similar to the impacts experienced at the neighboring 1847 N Cherokee residences.

101 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.

Operation

During Project operations, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Operational ground-borne vibration in the Project's vicinity would be generated by its related vehicle travel on local roadways. As previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. Project-related traffic would expose nearby land uses and other sensitive receptors to vibrations far below levels associated with human annoyance or land-use disruption. As a result, the Project's long-term vibration impacts would be considered less than significant.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant. The majority of the Project's long-term noise impacts would come from traffic traveling to and from the Project. This, the addition of future traffic from any new developments in the Project area, and overall ambient traffic growth would elevate ambient noise levels surrounding local roadways. Though the Project's traffic would contribute to cumulative increases in ambient noise, its individual impact would be negligible. The Project's minimal amount of traffic would not considerably add to ambient noise levels along any nearby roadways. As a result, the Project's cumulative operational noise impact would be considered less than significant by the City's L.A. CEQA Thresholds Guide.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant. As discussed earlier, construction activities would temporarily increase ambient noise levels at nearby receptors. Any other future developments that are built noise levels. However, given the relatively high ambient noise levels along Franklin Avenue, it is unlikely that construction noises from concurrent developments would be audible at Project receptors, let alone capable of contributing to cumulatively considerable noise increases. Persistent traffic noise would mask any distant construction sounds in a manner largely similar to the effects of white noise, and the presence of numerous multi-story structures would further obstruct these sounds' line of sight travel. The Project's construction activities would not be expected to contribute substantially to any cumulative construction noise impacts.

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 expose people residing or working in the project area to excessive noise levels?

No Impact. As previously discussed in response **8 e)**, the Project is not located within an airport land use plan or within two miles of a public or public use airport. The Project would have no impact on people residing or working in the Project area.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. As previously discussed in response **8 f)**, the Project site is not within the vicinity of a private airstrip. It would have no impact on people residing or working in the Project Area.

Mitigation Measures

The following mitigation measures shall be implemented to reduce Project noise impacts to less than significant levels.

NOI-MM-1 All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA.

NOI-MM-2 Temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA shall be erected along the Project's northern and western boundaries to obstruct line of sight noise travel from the Project site to Canyon Co-Op School, Las Palmas Senior Citizen Center, and Franklin Avenue Residences.

NOI-MM-3 At the Project's eastern and southern boundaries, temporary sound barriers capable of achieving a sound attenuation of at least 15 dBA shall be erected to obstruct line of sight noise travel between the Project site and Cherokee Avenue Residences.

13. POPULATION AND HOUSING

Would the project:

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

Less Than Significant Impact. As previously discussed, the Project Site is located within the jurisdiction of SCAG. SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), the Regional Transportation Plan (RTP) and the Regional Housing Needs Assessment (RHNA), in coordination with other population employment, and housing projections for the regions and its subdivisions. In April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan Sustainable Communities Strategy update (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040. It also includes projections of population, households, and employment through the horizon year. he Proposed Project is a 6-story infill senior housing development, consisting of 68 residential units (67 senior units and one on-site manager unit), recreation/open space areas, and a two-level subterranean parking garage. As an infill development, the project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the project would utilize the existing facilities.

The Project would develop 68 residential units in the City of Los Angeles. The Proposed Project could add up to 186 residents to the Plan area, based on the City's projected household density.[102] The Project Site is classified as "Residential" in the General Plan, a zoning classification that allows residential uses.

SCAG's growth forecasts from the 2012 RTP/ SCS are largely built off local growth forecasts from local governments like the City of Los Angeles. The 2012 RTP/SCS forecasts up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020. The Draft 2012 RTP/SCS, released for public review on December

[102] There would be a total of 67 new senior housing units and one unit set aside for an on-site manager. Thus the number of potential new residents presented is a worst-case scenario, given that the senior housing units will in all likelihood be occupied by a maximum of two persons, and in many cases by a sole occupant. Census statistics show that average household size decreases with age, especially after age 45, and is below two persons per household for households over age 65. National Association of Home Builders 50+ Housing Council, *Approving 55+ Housing: Facts That Matter*, https://www.winchester.us/DocumentCenter/View/1182, accessed October 16, 2017.

4, 2015, accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the City's Hollywood Community Plan area. The Community Plan implements land use standards of the General Plan Framework at the local level. The Project is consistent with the City's projected growth capacity for the Community Plan area, which accommodated a projected population of 219,000 persons by 2010.[103] The City has not updated projections beyond 2010 for the Community Plan area.

Table V-22
SCAG 2012 Regional Transportation Plan Growth Forecast and Proposed Project Population Figures

Forecast Year	Population in City of Los Angeles	Proposed Project	Households in City of Los Angeles	Proposed Project	Employment in City of Los Angeles	Proposed Project
2008	3,770,500	186	1,309,900	68	35,900	0
2020	3,991,700		1,455,700		37,100	
2035	4,320,600		1,626,600		38,600	

Source: DKA Planning 2016 based on SCAG 2012 Regional Transportation Plan Growth Forecast. Assumes 2.74 persons per household per 2016 RTP/SCS.

As Shown in **Table V-22, SCAG 2012 Regional Transportation Plan Growth Forecast and Proposed Project Population Figures** the Project is well within the forecast growth assumptions. Further, the Proposed Project would not cause a substantial increase in population growth in the area and impacts would be considered less than significant, and no further analysis is required.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. No housing exists on the Project Site. The site is currently developed with a surface parking lot and an open courtyard. The Proposed Project would not result in the displacement of existing housing or displace a substantial number of people resulting in the construction of replacement housing elsewhere. The project will provide 68 new residential units. No impacts would occur, and no further analysis is required.

103 City of Los Angeles, *Hollywood Community Plan*, www.cityplanning.lacity.org/complan/pdf/hwdcptxt.pdf. 2014.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. See response to **Section 13(b)**, above. No further analysis is required.

14. PUBLIC SERVICES

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

i) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 507.3.3, Table 507.3.3, of the 2014 City of Los Angeles Fire Code, the maximum response distance between high density residential land uses and a LAFD fire station that houses an engine company or truck company is 1.5 miles or 2 miles, respectively. Minimum fire flow requirement for high-density residential land uses is 4,000 gallons per minute (gpm) from four adjacent hydrants flowing simultaneously.[104] If either of these distances were exceeded, all structures located in the applicable residential buildings would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

The Project Site is assigned to LAFD Operations West Bureau, Battalion 5 and is served by Fire Station 27 located at 1327 Cole Avenue, approximately one mile from the Project Site. Other fire stations within proximity to the Project Site include LAFD Fire Station 82, located at 5769 Hollywood Boulevard approximately 1.4 miles from the Project Site, and LAFD Fire Station 41, located at 1439 N. Gardner Street, approximately 1.6 miles from the Project Site.

The Proposed Project is a 6-story infill senior housing development, consisting of 68 residential units (67 senior units and one unit for an on-site manager), recreation/open space areas, and a two-level subterranean parking garage. The

[104] 2014 City of Los Angeles Fire Code, page 92

project would incorporate all applicable provisions of the LAMC Fire Code, including, but not limited to, installation of an automatic sprinkler system, smoke detectors, and a fire alarm system. Notwithstanding the above, implementation of the Proposed Project could result in an increase in calls for fire protection and emergency medical services.

The Proposed Project would increase the intensity of development on the site by adding new residential uses. The 68 new residential units, anticipated to generate up to approximately 186 residents[105], would be expected to increase the demand on existing fire protection and emergency services. The Proposed Project would be required to comply with the 2014 LAFC and any subsequent codes prior to the issuance of any construction permits, including the requirements for automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.). As specified in Table 507.3.1 of the 2014 LAFC, a fire flow of 4,000 gpm from four adjacent fire hydrants, flowing simultaneously, with 20 pounds per square inch (psi) minimum residual pressure is required for high density residential structures located in a neighborhood commercial area.[106] Construction of the Proposed Project would require the installation and/or upgrade of the existing utilities on the site, including the water supply infrastructure. Thus, the infrastructure would be designed and constructed in accordance with the specifications included in the 2014 LAFC, including the fire flow requirements outlined in Section 507.

A fire flow test would be performed during the permit review period to determine if any utility improvements are needed on the site and/or for the surrounding area to ensure adequate fire flows and infrastructure pursuant to the 2014 LAFC. Pursuant to the LAFC, all required infrastructure improvements would be operational prior to construction and/or operation of the Proposed Project.

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105 There would be a total of 67 new senior housing units and one unit set aside for an on-site manager. Thus the number of potential new residents presented is a worst-case scenario, given that the senior housing units will in all likelihood be occupied by a maximum of two persons, and in many cases by a sole occupant. Census statistics show that average household size decreases with age, especially after age 45, and is below two persons per household for households over age 65. National Association of Home Builders 50+ Housing Council, *Approving 55+ Housing: Facts That Matter*, https://www.winchester.us/DocumentCenter/View/1182, accessed October 16, 2017.

106 City of Los Angeles Fire Code, Section 507 Fire Protection Water Supplies, Table 507.3.1.

Based on the above information, implementation of the Proposed Project would not result in any substantial adverse physical impacts associated with the provision of new or physically altered fire and/or emergency facilities and/or the need for new or physically altered fire and/or emergency facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objectives.

In addition, with the site plan review **Regulatory Compliance Measure PS-RCM-1,** listed below, the project would have a less-that-significant impact on fire protection services. No further analysis is required.

Regulatory Compliance Measure

PS-RCM-1: The Project Applicant shall incorporate all recommendations of the Fire Department relative to fire safety into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling units or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

ii) Police protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. The determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the Proposed Project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Project Site is located in the Hollywood Area division of the LAPD's West Bureau. The Hollywood Area spans 17.2 square miles; the approximate borders

are Normandie Avenue on the east, West Hollywood on the west, Mulholland Drive on the north and Beverly Boulevard on the south. Neighborhoods served by the Hollywood Community Police Station include: Hollywood, Mount Olympus, Fairfax District (North of Beverly Boulevard), Melrose District, Argyle Avenue, and Los Feliz Estates. Besides the approximately 300,000 residents, the Hollywood Area attracts tourists from all over the world who visit famous sites depicted in television and the movies.[107] The Proposed Project would be served by the Hollywood Community Police Station, located at 1358 N. Wilcox Avenue, approximately 0.9 miles south of the Project Site. Within the Hollywood Area, the Proposed Project is located within Reporting District (RD) 636. RD. **Table V-23, Hollywood Area Police Station Crime Statistics**, below, shows the year to date crime statistics for the Hollywood Area Police Station service area.

Table V-23
Hollywood Area Crime Statistics

Type of Crime	2017[a]	2016[a]	2015[a]
Part I Crimes[b]			
Violent Crimes			
Homicide	2	4	7
Rape	113	99	96
Robbery	350	385	291
Aggravated Assault	469	425	416
Subtotal	**934**	**913**	**810**
Property Crimes			
Burglary	318	431	336
Motor Vehicle Theft	409	415	369
Burglary – Theft from Vehicle	1,414	1,136	953
Personal / Other	1,195	1,340	1,233
Subtotal	**3,336**	**3,322**	**2,891**
Total 'Part 1' Crimes	**4,270**	**4,235**	**3,701**
Part II Crimes[b]			
Child/Spousal Abuse	417	370	316
Shots Fired	28	36	25
Shooting Victims	15	15	11

a – year-to-date (comparative for previous years)
b – crime statistics are divided into categories to comply with the FBI's 'Uniform Crime Reporting Guidelines'.
Source: Los Angeles Police Department, Hollywood Los Angeles Area Profile, http://assets.lapdonline.org/assets/pdf/hwdprof.pdf, accessed September 20, 2017.

107 *Los Angeles Police Department, About Hollywood, website: http://www.lapdonline.org/hollywood_community_police_station/content_basic_view/1665, accessed April 28, 2017.*

Response times are an additional metric used by the LAPD to measure the adequacy of police service. Response time is defined as the total time from when a call requesting assistance is made until the time the first unit responds to the scene. Calls for police assistance are prioritized based on the type of call. Currently the LAPD's response time goal is seven minutes for high-priority calls and 40 minutes for non-emergency calls. The Hollywood Area Division is currently meeting this response time goal.

Implementation of the Proposed Project would result in an increase of residents and guests to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the project residents would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls to the LAPD.

With the implementation of the **Project Design Features SEC-PDF- 1 and SEC-PDF- 2,** and adherence to the **Regulatory Compliance Measure PS-RCM-2** identified below, the Proposed Project's potential impact upon LAPD services would be considered less than significant. No further analysis is necessary.

Project Design Features

SEC-PDF-1: The Applicant shall submit site plans and building plans as necessary to the LAPD Crime Prevention Unit to ensure the design incorporates building design standards that enhance police protection and meet *Design Out Crime* Guidelines. The project includes, but is not limited to, the following features:

- Natural surveillance: Physical features, activities, and people gathering areas are placed in a way that maximizes visibility.

- Mix of uses that provide good visual connection between uses, and no ambiguous unassigned spaces.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting, which provide nighttime vision for pedestrians, residents, and business people to permit pedestrians to see one another.
- Clear well-lit paths from the street to the development through parking and landscape areas and within the development to building entries.
- Territorial reinforcement: The establishment of the building perimeter creates physical attributes to define ownership and separate public and private spaces.

SEC-PDF-2: During construction, security measures shall be provided including security fencing, lighting, and locked entries around the construction zones.

Regulatory Compliance Measure

PS-RCM- 2: The project plans shall incorporate the Design Guidelines (defined in the following sentence) relative to security, semi-public and private spaces, which may include but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed, as outlined in "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Los Angeles Police Department prior to the issuance of building permits.

iii) Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). Implementation of the Proposed Project would result in the construction of 68 new residential units (67 senior units and one unit for an on-site manager) on the Project Site.

Due to the nature of the Proposed Project, a senior citizen housing development, it is not expected that a substantial number of students would be generated by implementation of the Project. Any generation of new students from the Proposed Project would likely be incidental and negligible. Impacts would be less than significant.

iv) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the Proposed Project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. The Recreation Plan notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. It is important to note that these standards are Citywide goals and are not intended to be requirements for individual development projects. The Proposed Project is located within a highly developed area within the Hollywood Community Plan Area. As shown in **Table V-24**, **Recreation and Park Facilities within the Project Area** there are seven parks that equate to over 166 acres of parkland and public recreation facilities within a 2-mile radius of the Project Site.

Table V-24
Recreation and Park Facilities within the Project Area

Facility Name	Park Size	Distance from Project Site	Amenities
Las Palmas Senior Center	1.1 acres	0.05 mile	children's play area, multi-purpose field, auditorium, community room, stage
Yucca Community Center/ Yucca Park	0.6 acres	0.12 miles	basketball courts (lighted / outdoor), children's play area, picnic tables, soccer field (unlighted), community room, synthetic field
Selma Park	0.2 acres	0.37 miles	children's play area, benches, outdoor tables
Dorothy and Benjamin Smith Park	0.4 acres	0.42 miles	benches, sitting area
De Longpre Park	1.35 acres	0.65 miles	benches, children's play area
Runyon Canyon Park	160 acres	0.81 miles	children's play area, hiking trail, dog park
Hollywood Recreation Center Hollywood Pool	3.0 acres	0.95 miles	auditorium, basketball courts (lighted / outdoor), children's play area, community room, kitchen, multipurpose sports field, swimming pool

Source: City of Los Angeles Department of Recreation and Parks website, http://www.laparks.org/maplocator?cat_id=All&geo[radius]=10&geo[latitude]=34.1049725&geo[longitude]=-118.3350754&address=6650%20Franklin%20Ave,%20Los%20Angeles,%20CA%2090028,%20USA, accessed September 7, 2017.

The LAMC requires the Proposed Project to provide 5,440 square feet of open space. The Proposed Project would provide approximately 7,000 square feet of total open space and amenities on-site available to serve project residents and their guests. The Proposed Project would include a variety of on-site amenities including, but not limited to: courtyards, gardens and landscaping containing drought tolerant plants, outdoor seating and relaxing areas, and viewing decks. Therefore, the Proposed Project would achieve the required square feet of open space required by the LAMC.

As discussed in Checklist Question 13(a), it is estimated that the development of the Proposed Project would result in an increase of 186 new residents to the area. Based on the standard parkland ratio goal of 4-acres per 1,000 residents, the Proposed Project would generate a Citywide goal of serving such residents with approximately 0.74 acres of additional public parkland. The Proposed Project

would contribute towards the achievement of such goal through a combination of (1) on-site open space proposed within the project, (2) payment of applicable taxes in accordance with LAMC Section 21.10.3(a)(1), and (3) the availability of existing park and recreation facilities within the area.

In addition to the on-site open space provided within the Proposed Project, the Proposed Project is subject to a tax of $200 per dwelling unit pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax). This tax, payable to the Department of Building and Safety, shall be deposited into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. In accordance with LAMC Section 21.10.3(a)(1), this tax may be offset or reduced based on the amount of on-site open space and recreational amenities provided on-site. Therefore, under the City's mandatory Dwelling Unit Construction Tax, which is collected prior to a certificate of occupancy for residential land uses, per **Regulatory Compliance Measure PS-RMC-4**, the Proposed Project's impact upon parks and recreational facilities would be reduced to a less-than-significant level. No further analysis is necessary

Regulatory Compliance Measure

PS-RCM-4: Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

v) Other Public Facilities? - Libraries

Less Than Significant Impact. A significant impact would occur if the project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site and the project area. Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides services at the Central Library, eight Regional Branch Libraries and 64 Community Branch Libraries. There are a total of three library facilities within two miles of the Project Site, the Frances Howard Goldwyn Hollywood Regional Library, the Will and Ariel Durant Branch Library and the Louie B. Mayer Branch Library. The closest facility is the Frances Howard Goldwyn Hollywood Regional Library located at 1623 Ivar Avenue, approximately 0.7 miles from the Project Site.

The need for public library services is generally calculated based on permanent population in a given area. As stated in **Section 13, Population and Housing,** the

Proposed Project includes 68 residential units which would generate approximately 186 new residents in the project area.[108]

The voters of the City of Los Angeles approved ballot Measure L in 2011, which amended the City Charter "… to incrementally increase the amount the City is required to dedicate annually from its General Fund to the Library Department to an amount equal to .0300 percent of the assessed value of all property in the City, and incrementally increase the Library Department's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs, in order to provide Los Angeles neighborhood public libraries with additional funding to help restore library service hours, purchase books and support library programs, subject to audits, using existing funds with no new taxes." Under the terms of Measure L, libraries will be required to pay for their own direct and indirect costs by July 2014.

Los Angeles public libraries are currently adequately funded by Measure L to purchase books, materials, and provide extra services through the public library system.[109] Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Proposed Project, which would increase with the new development. It is also anticipated that the Project would not conflict with the goals outlined in the Los Angeles General Plan, Los Angeles Public Library Strategic Plan 2015-2020, and the Palms–Mar Vista–Del Rey Community Plan.

Based on the above information, implementation of the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities and/or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objectives. Impacts would be less than significant, and no mitigation would be required.

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108 There would be a total of 67 new senior housing units and one unit set aside for an on-site manager. Thus the number of potential new residents presented is a worst-case scenario, given that the senior housing units will in all likelihood be occupied by a maximum of two persons, and in many cases by a sole occupant. Census statistics show that average household size decreases with age, especially after age 45, and is below two persons per household for households over age 65. National Association of Home Builders 50+ Housing Council, *Approving 55+ Housing: Facts That Matter*, https://www.winchester.us/DocumentCenter/View/1182, accessed October 16, 2017.

109 Measure L, Los Angeles Public Library

15. 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?**

Less Than Significant Impact. Similarly to the discussion provided above in **Section 14(iv),** the Proposed Project would cause a less than significant impact on parks and/or recreational facilities. A significant impact to recreation would occur if the project would increase the use of existing neighborhood and regional parks or other recreational facilities to the point of substantial physical deterioration. The Proposed Project consists of the construction and operation of a senior living facility. With new residents in the area, there may be an increase use in the surrounding parks and recreational facilities. However, as mentioned in **Section 14(iv)**, the City's General Plan outlines a desired long-range standard for local parks based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. In addition, the Proposed Project would provide approximately 7,000 square feet of total open space and amenities on-site.

b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant Impact. See response to **Section 14(iv)**, above.

16. TRANSPORTATION AND TRAFFIC

Would the project:

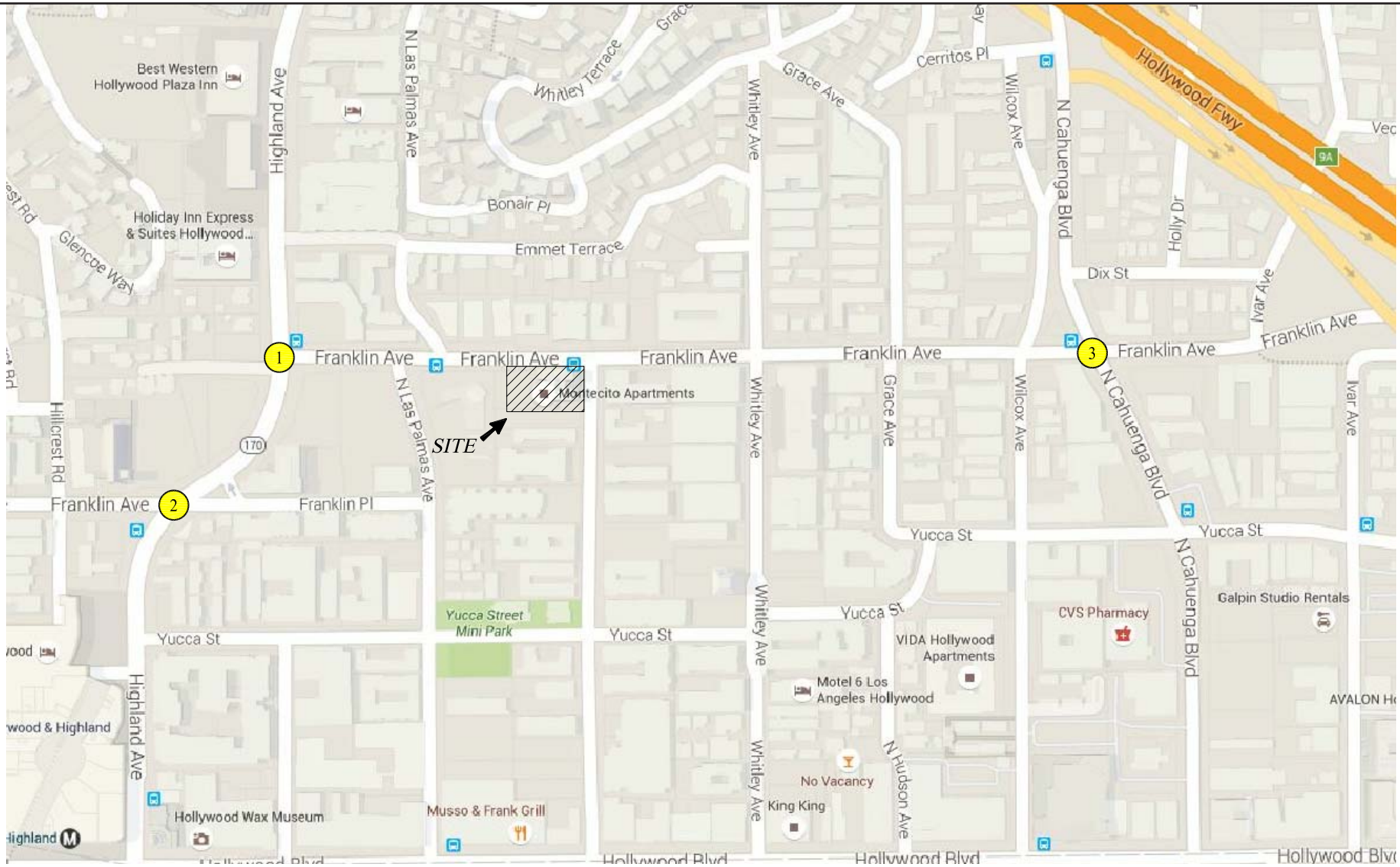
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit??

Less Than Significant Impact The Proposed Project would provide a total of 68 new housing units (67 senior housing units and one on-site manager's unit). The following transportation and traffic analysis is based on the **Technical memorandum – Montecito Senior Housing Project (Traffic Study)** by Linscott Law and Greenspan Engineers (LLG), dated October 20, 2016. The Traffic Study was approved by the Los Angeles Department of Transportation (LADOT) in a memo dated January 26, 2017. Both documents are hereby incorporated by reference and included in the Initial Study as **Appendix G**.

The project study area, as defined through consultation with LADOT staff, includes the following study intersections:

1. Highland Avenue / N. Franklin Avenue
2. Highland Avenue / S. Franklin Avenue – Franklin Place
3. Cahuenga Boulevard / Franklin Avenue

The intersections selected for analysis were identified as they are located closest to the Project site, and therefore have the greatest potential to have adverse traffic impacts related to the project. Further away from the Project site, project-related traffic disperses, and thus, the potential for significant traffic impacts diminish. The existing lane configurations and traffic control devices at the study intersections are provided on **Figure V-1, Study Intersection Locations** and **Figure V-2, Existing Lane Configurations.**



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-1**

IMPACT SCIENCES

Study Intersection Locations

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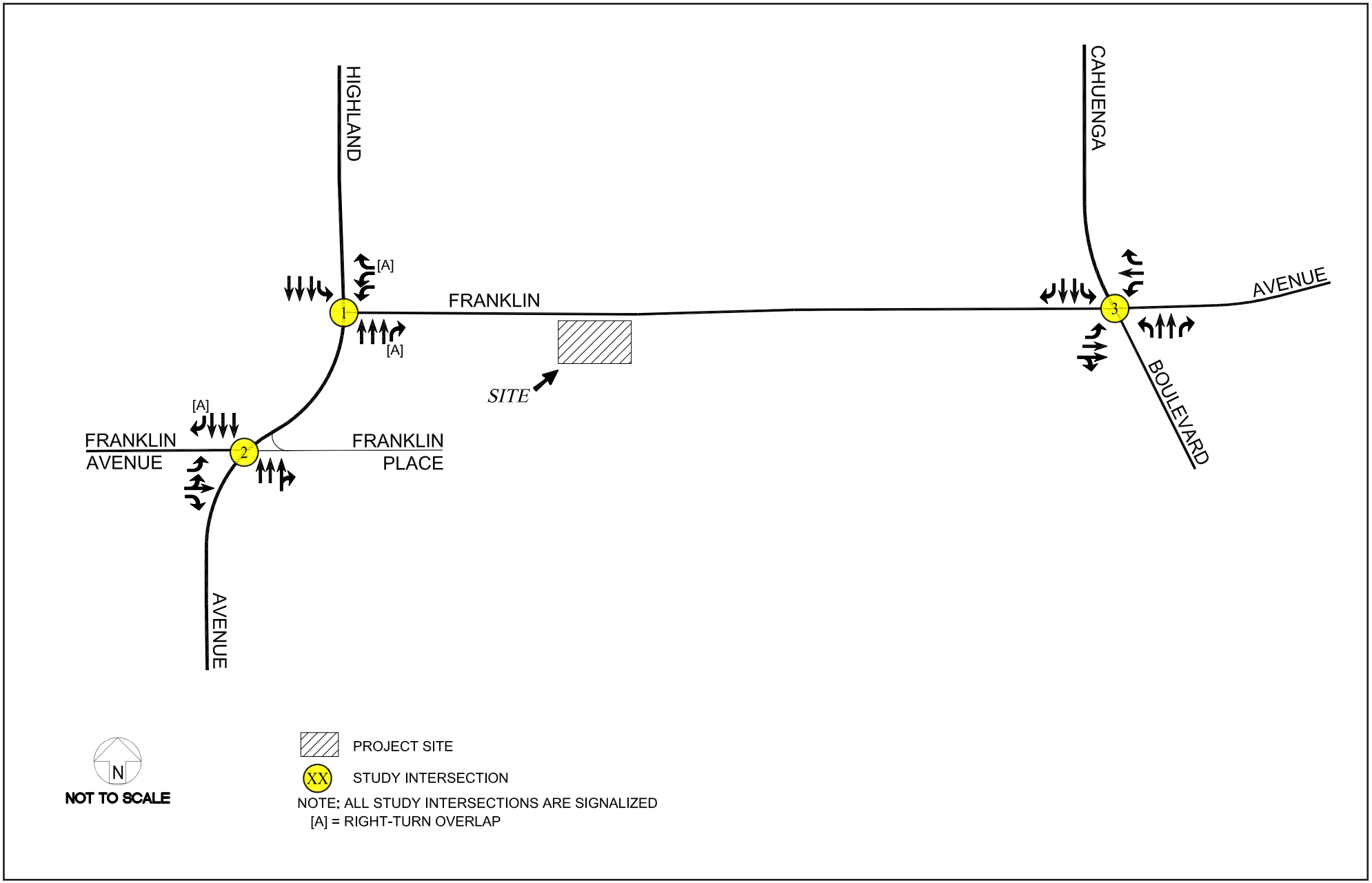


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-2**

IMPACT SCIENCES

Existing Lane Configurations

Project traffic impacts are analyzed for the weekday AM and PM peak-hour time periods at the study intersections. Traffic analysis in this section includes the following scenarios:

- Existing
- Existing with Project
- Future without Project
- Future with Project

LLG coordinated with Los Angeles Department of Transportation (LADOT) at the start of the traffic study to achieve consensus on assumptions such as study intersections, trip generation, and trip distribution. Manual traffic counts of vehicular turning movements were conducted during the week of May 9, 2016 at the study intersections during the weekday morning and afternoon commuter periods to determine the peak hour traffic volumes. The manual traffic counts at the study intersections were conducted from 7:00 AM to 10:00 AM to determine the AM peak commuter hour, and from 3:00 PM to 6:00 PM to determine the PM peak commuter hour. The existing peak hour volumes at each study intersection are shown on **Figure V-3, Existing Traffic Volumes, AM Peak Hour,** and **Figure V-4, Existing Traffic Volumes, PM Peak Hour**.

For analysis of Level of Service (LOS) at signalized intersections, LADOT has designated the Circular 212 Planning methodology as the desired tool. The concept of roadway level of service under the Circular 212 method is calculated as the volume of vehicles that pass through the facility divided by the capacity of that facility. A facility is "at capacity" (V/C of 1.00 or greater) when extreme congestion occurs. This volume/capacity ratio value is a function of hourly volumes, signal phasing, and approach lane configuration on each leg of the intersection.

Level of service (LOS) values range from LOS A to LOS F. LOS A indicates excellent operating conditions with little delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating "capacity" of a roadway. **Table V-25, Level of Service as a Function of CMA Values** defines the level of service criteria applied to the study intersections.

Table V-25
Level of Service as a Function of CMA Values

Level of Service	Description of Operating Characteristics	Range of CMA Values
A	Uncongested operations; all vehicles clear in a single cycle.	< 0.60
B	Same as above	>0.60<0.70
C	Light congestion; occasional backups on critical approaches.	>0.70<0.80
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	>0.80<0.90
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	>0.90<1.00
F	Forced flow with stoppages of long duration.	>1.00

Notes: CMA = Critical Movement Analysis; LOS = Level of Service
Source: LLG. 2017

Based on the existing traffic volumes and intersection geometries depicted in the Traffic Study, volume-to-capacity ratios and corresponding levels of service (LOS) were determined for the study intersections during the weekday AM and PM peak hours.

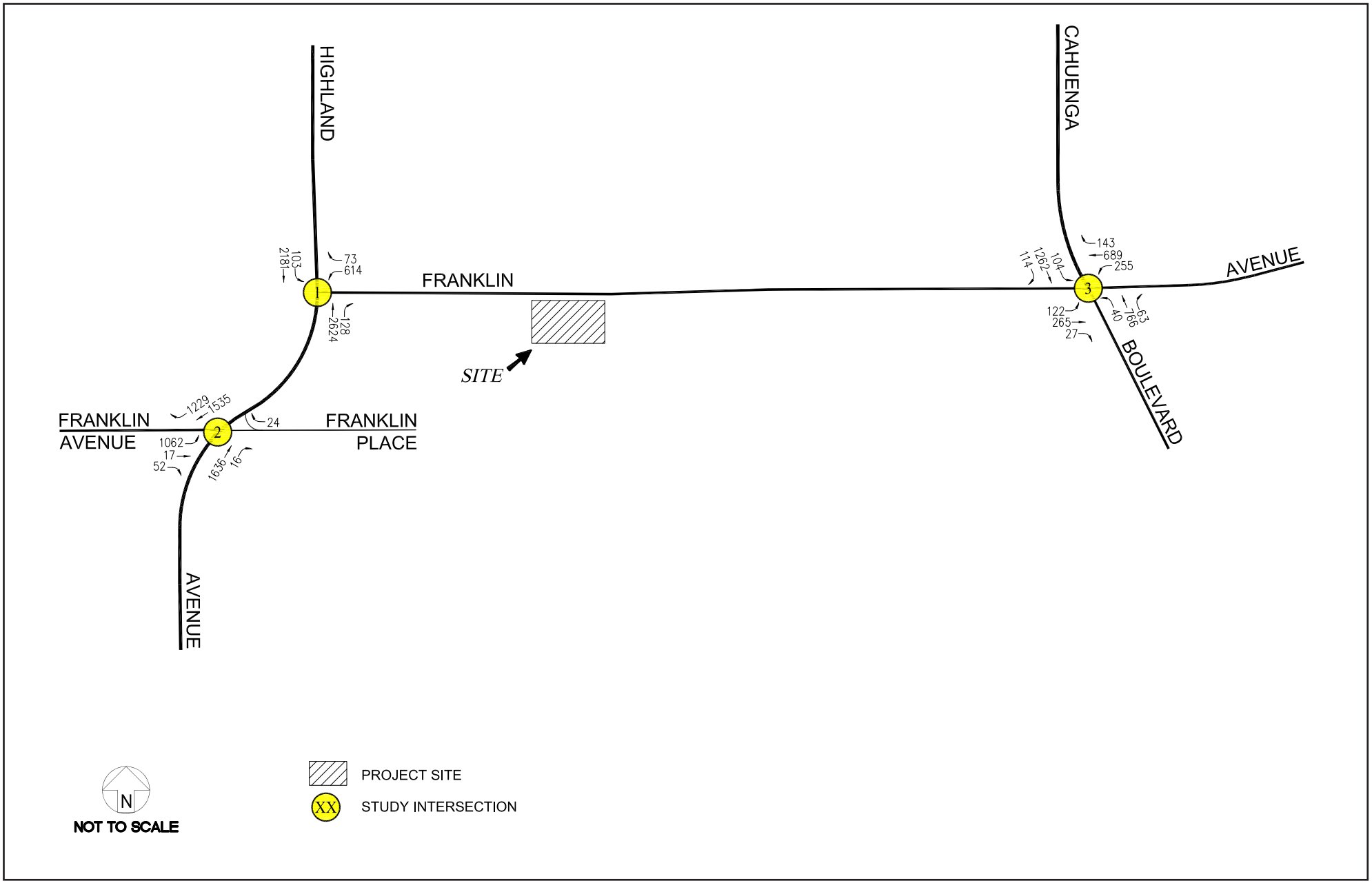
Traffic impacts are identified if a proposed development will result in a significant change in traffic conditions at a study intersection. A significant impact is typically identified if project-related traffic will cause service levels to deteriorate beyond a threshold limit specified by the overseeing agency. Impacts can also be significant if an intersection is already operating below an acceptable level of service and project related traffic will worsen conditions within the specified threshold range.

The City of Los Angeles Department of Transportation has established specific thresholds for project-related increases in the volume-to-capacity ratio (V/C) of signalized study intersections. The following increases in peak-hour V/C ratios are considered significant impacts

Table V-26
Significance Threshold

Level of Service	Final V/C	Project Related v/c increase
C	< 0.70 – 0.80	Equal to or greater than 0.040
D	< 0.80 – 0.90	Equal to or greater than 0.020
E and F	0.90 or more	Equal to or greater than 0.010

Note: Final V/C is the V/C ratio at an intersection considering impacts from the project, ambient growth, trips from area/cumulative projects, but without proposed traffic impact mitigations.



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-3**

IMPACT SCIENCES

Existing Traffic Volumes AM Peak Hour

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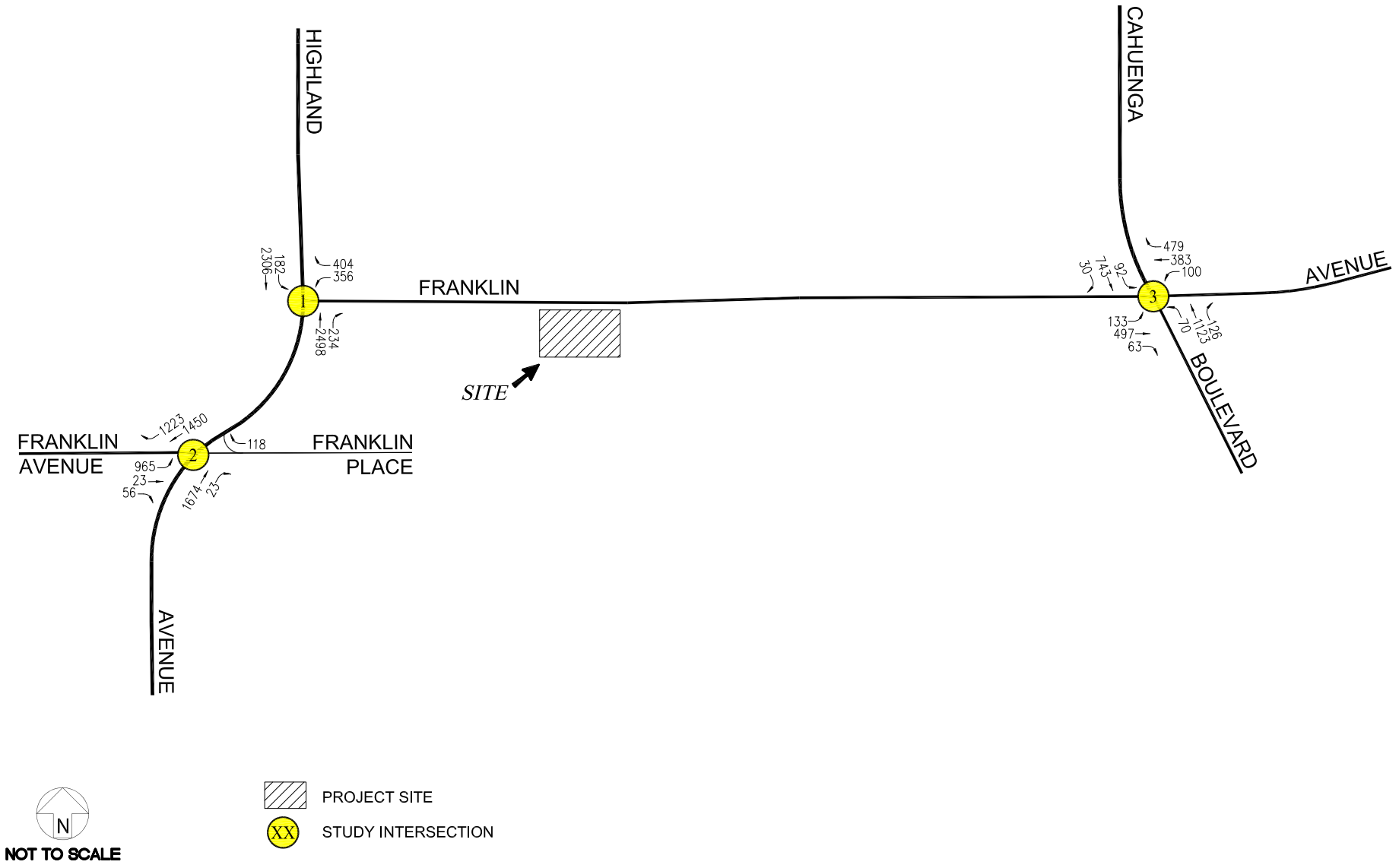


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE V-4

IMPACT SCIENCES

Existing Traffic Volumes PM Peak Hour

1291.001•09/17

Project Trip Generation

Traffic volumes expected to be generated by the proposed Project during the weekday AM and PM peak hours, as well as on a daily basis, were estimated using trip rates published in the ITE *Trip Generation* manual1. Trip generation rates for the Senior Adult Housing-Attached land use (ITE Land Use Code 252) were used to forecast the traffic volumes expected to be generated by the Project. The ITE Senior Adult Housing-Attached trip rates are based on the number of dwelling units proposed by the Project.

Table V-27, Project Trip Generation provides the trip generation forecast for the Project. As shown in **Table V-27,** the Project on a typical weekday is forecast to generate 234 net new daily trips (e.g., 117 inbound trips, 117 outbound trips), 14 net new AM peak hour trips (5 inbound trips and 9 outbound trips) and 17 net new PM peak hour trips (9 inbound trips and 8 outbound trips).

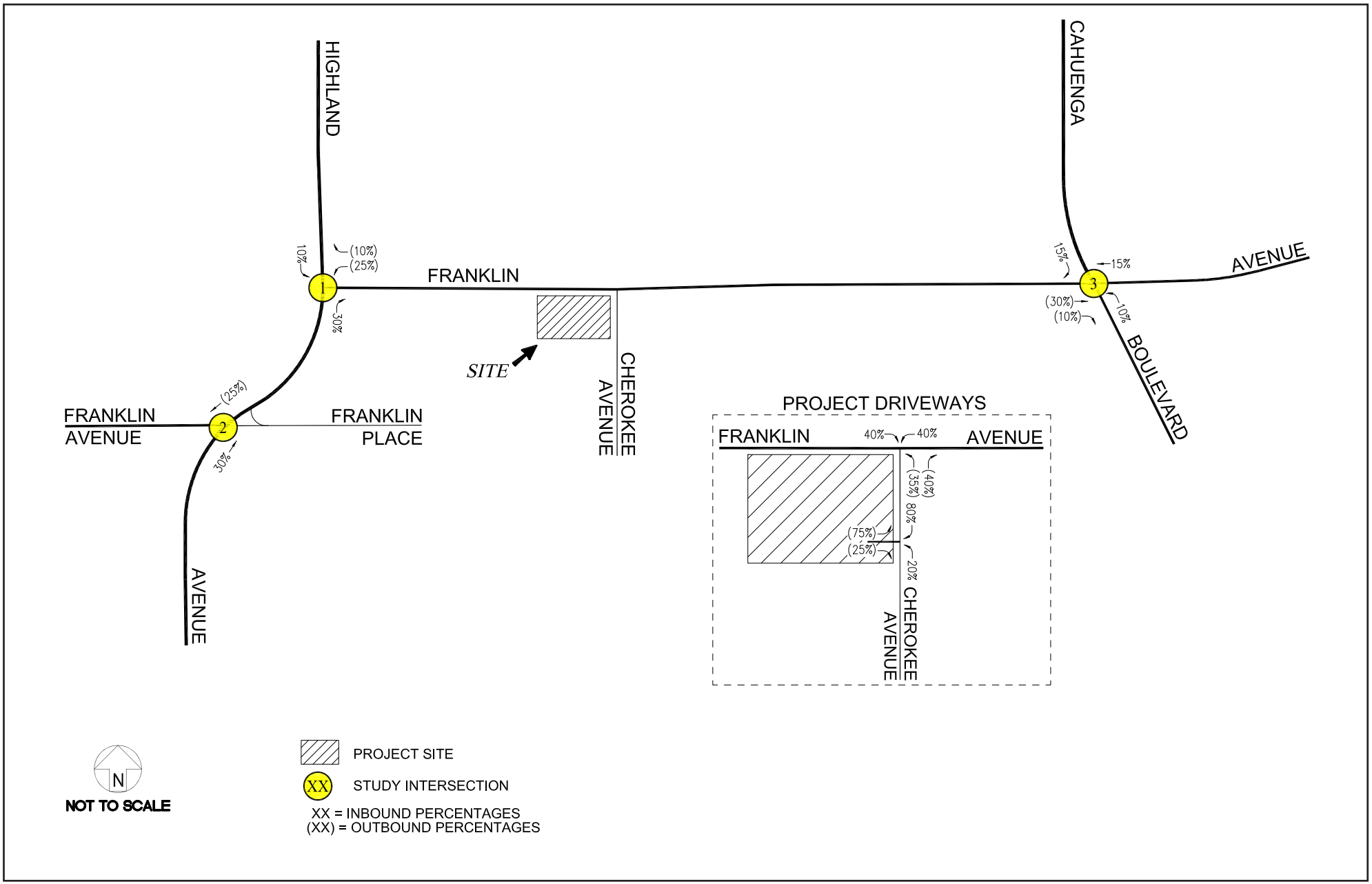
Table V-27
Project Trip Generation

Proposed Use	ITE Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
				I/B	O/B	Total	I/B	O/B	Total
Senior Apartments	252	68 du	234	5	9	14	9	8	17
Net Increase - Estimated Trips			**234**	**5**	**9**	**14**	**9**	**8**	**17**

Source: LLG. 2017

Project Trip Assignment

The weekday AM and PM commuter peak hour vehicle trips forecast to be generated by the Project were assigned to the study intersections. **Figure V-5, Project Trip Distribution** provides the vehicular trip distribution for the Project and **Figure V-6, Project Traffic Volumes, AM Peak Hour** and **Figure V-7, Project Traffic Volumes, PM Peak Hour** displays the forecast AM and PM peak hour Project-related trips at the study intersections.



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE V-5

IMPACT SCIENCES

Project Trip Distribution

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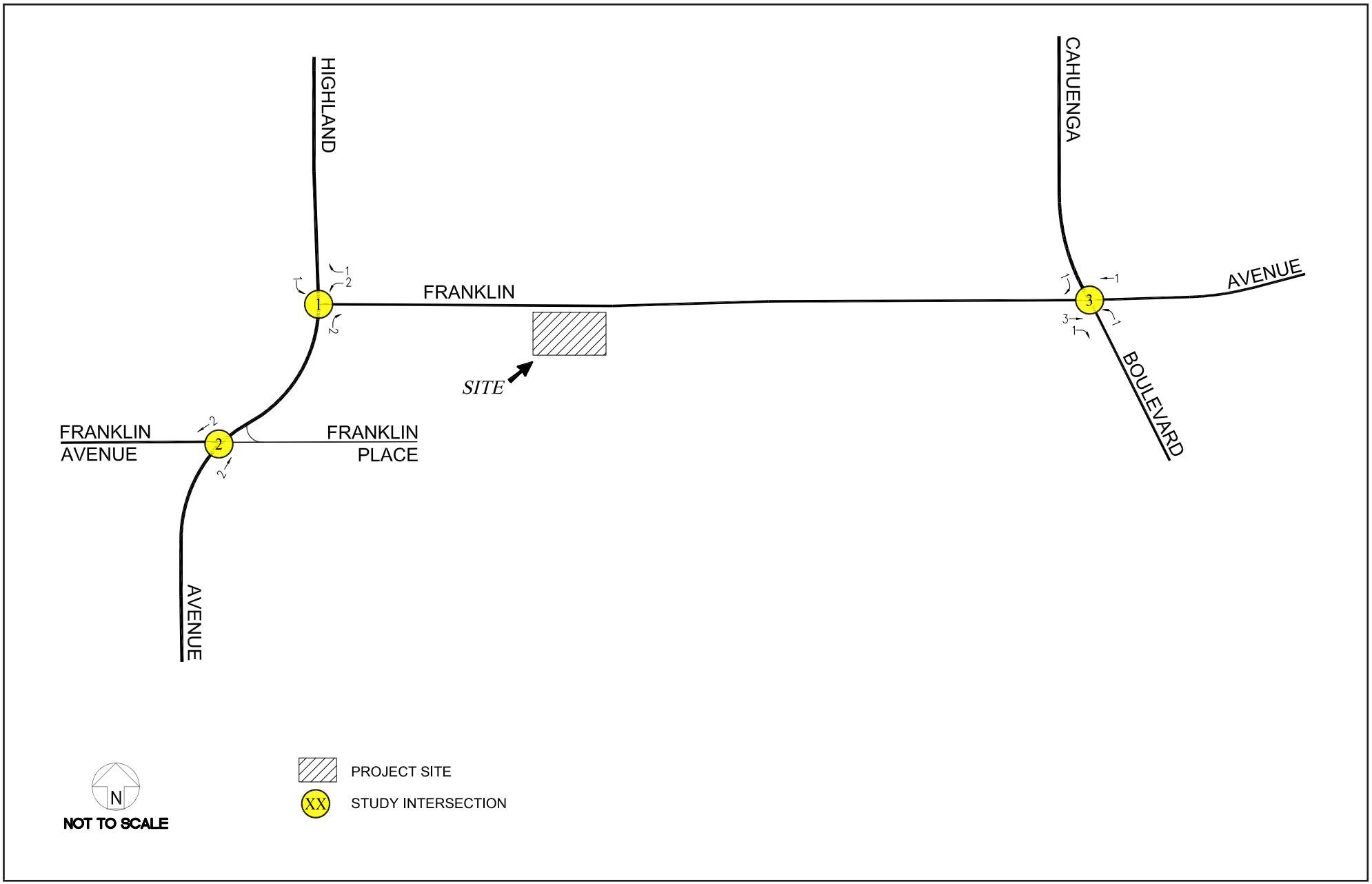

SOURCE: Linscott, Law & Greenspan, 2017

FIGURE V-6

IMPACT SCIENCES

Project Traffic Volumes AM Peak Hour

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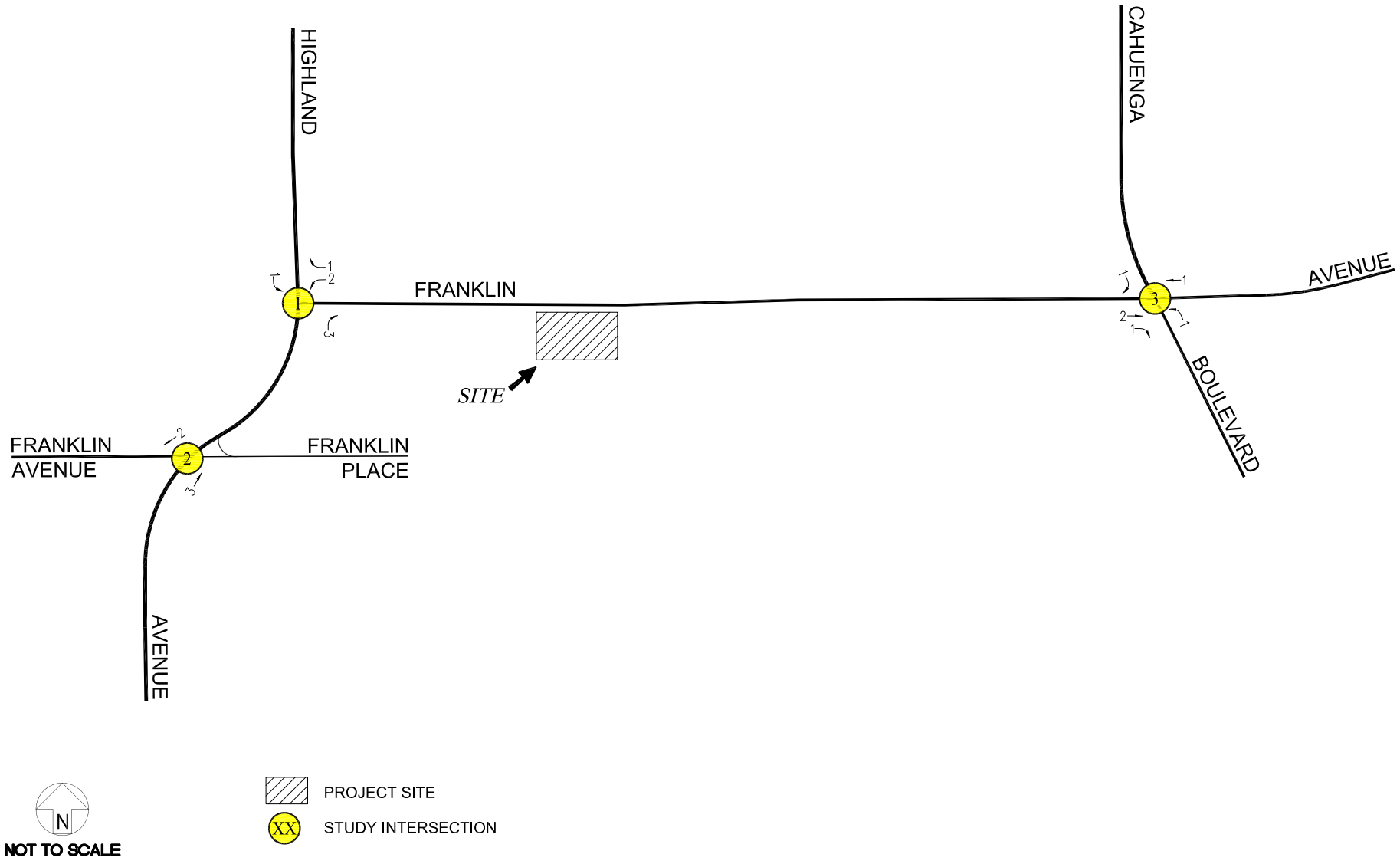
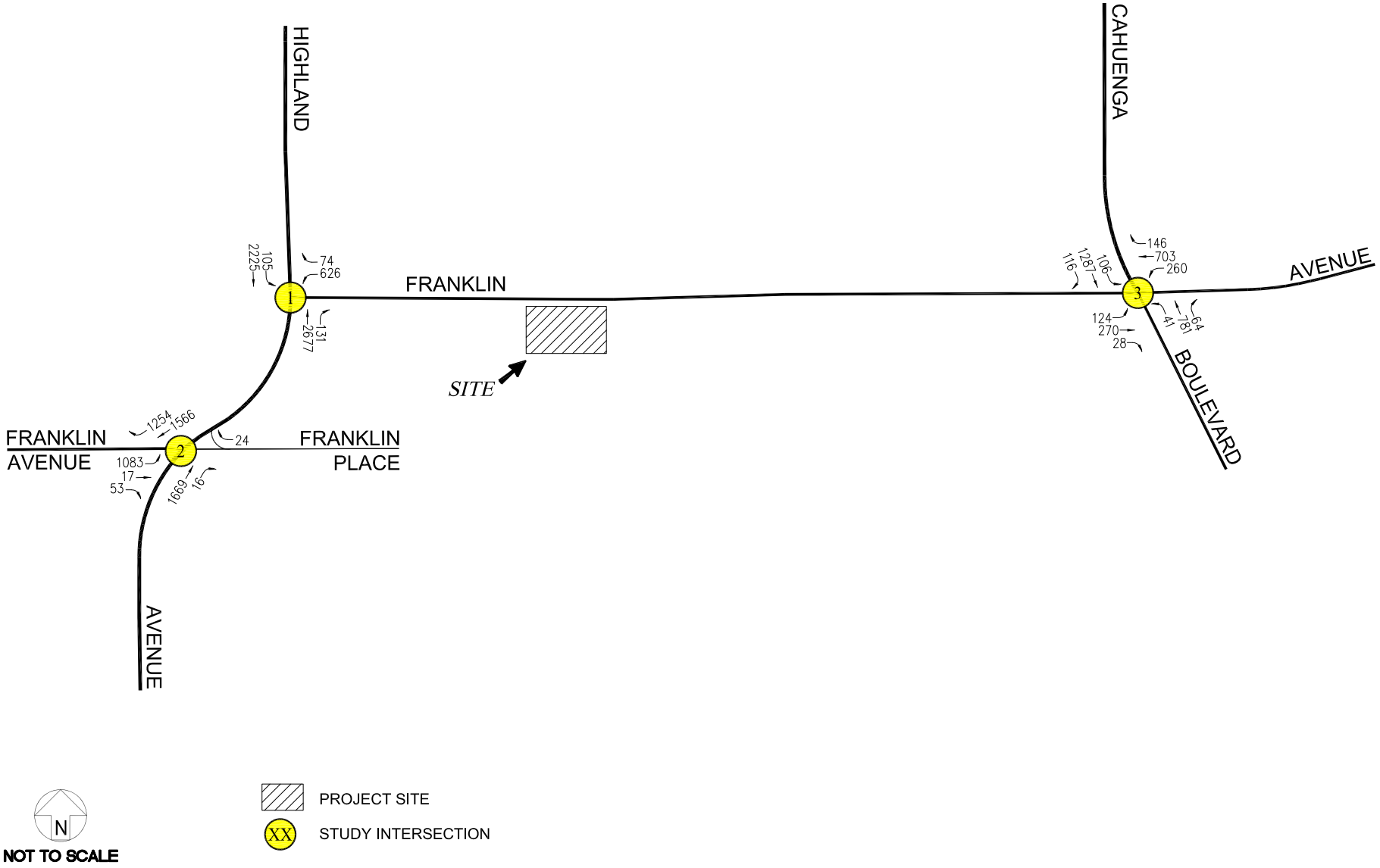


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE V-7

IMPACT SCIENCES

Project Traffic Volumes PM Peak Hour

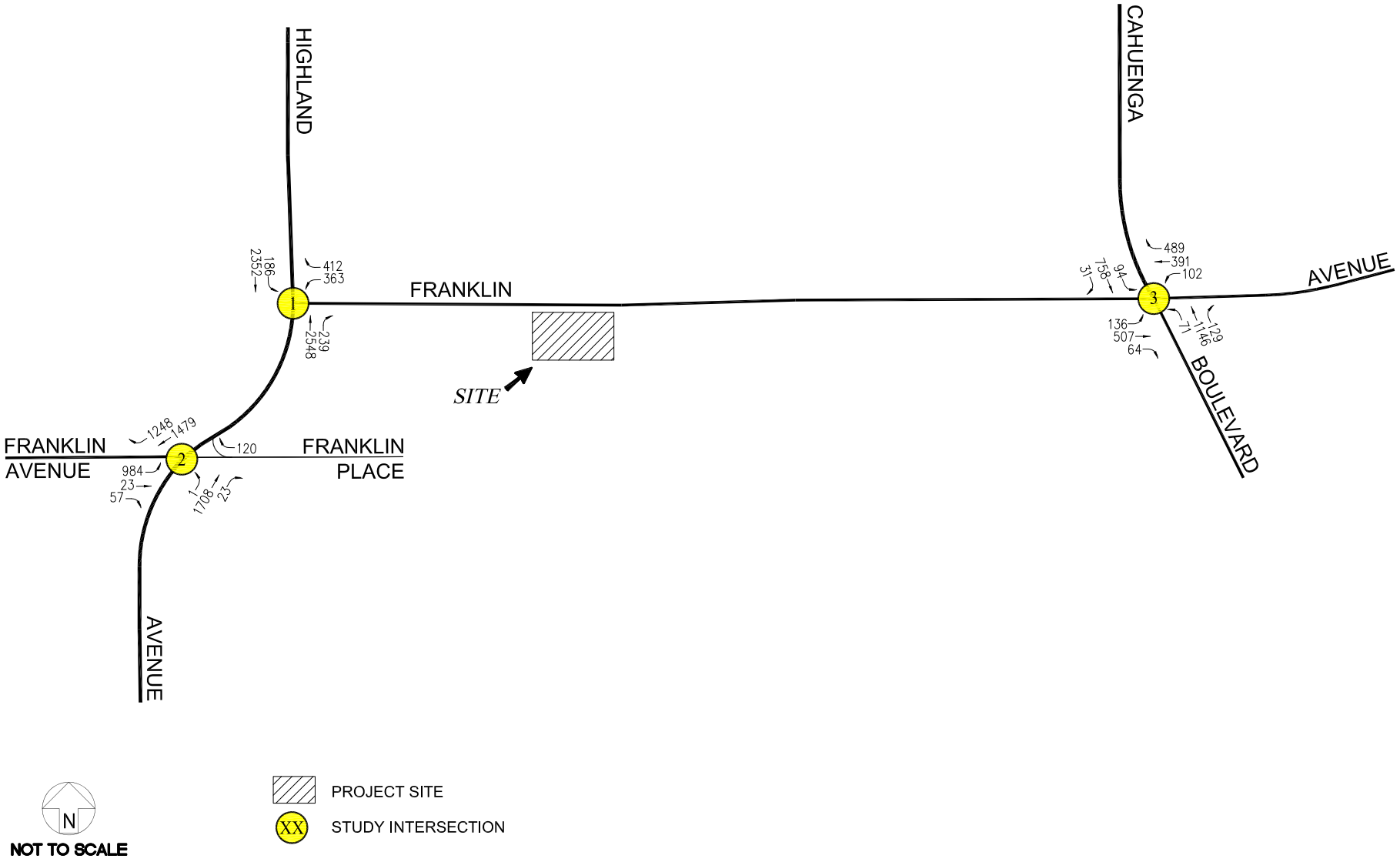


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-8**

IMPACT SCIENCES

Future without Project Traffic Volumes AM Peak Hour



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE V-9

IMPACT SCIENCES

Future without Project Traffic Volumes PM Peak Hour

The Future without Project traffic volumes are estimated based on application of a 1.0% annual ambient growth rate applied to the existing (2016) traffic volumes through the Project build-out year of 2018, as analyzed in the Traffic Study. The Future without traffic volumes for the AM and PM peak hours are shown on **Figure V-8, Future without Project Traffic Volumes, AM Peak Hour** and **Figure V-9, Future without Project Traffic Volumes, PM Peak Hour.**

The traffic impact analysis prepared for the study intersections using the CMA methodology and application of the City of Los Angeles significant traffic impact criteria are summarized for the Project in **Table V-28, Levels of Service Summary and Volume to Capacity Ratios AM and PM Peak Hours.**

The Existing with Project condition provided in **Table V-28** includes Project-related traffic added to existing traffic at the study intersections. The forecast changes in v/c ratios at the study intersections due to Project-related traffic are calculated to be below the City's significance thresholds as shown in column [2]. Therefore, the traffic impacts of the Project in the Existing with Project condition will be less than significant for all study intersections. The Existing with Project traffic volumes are provided on **Figure V-10, Existing with Project Traffic Volumes, AM Peak Hour** and **Figure V-11, Existing with Project Traffic Volumes, PM Peak Hour**

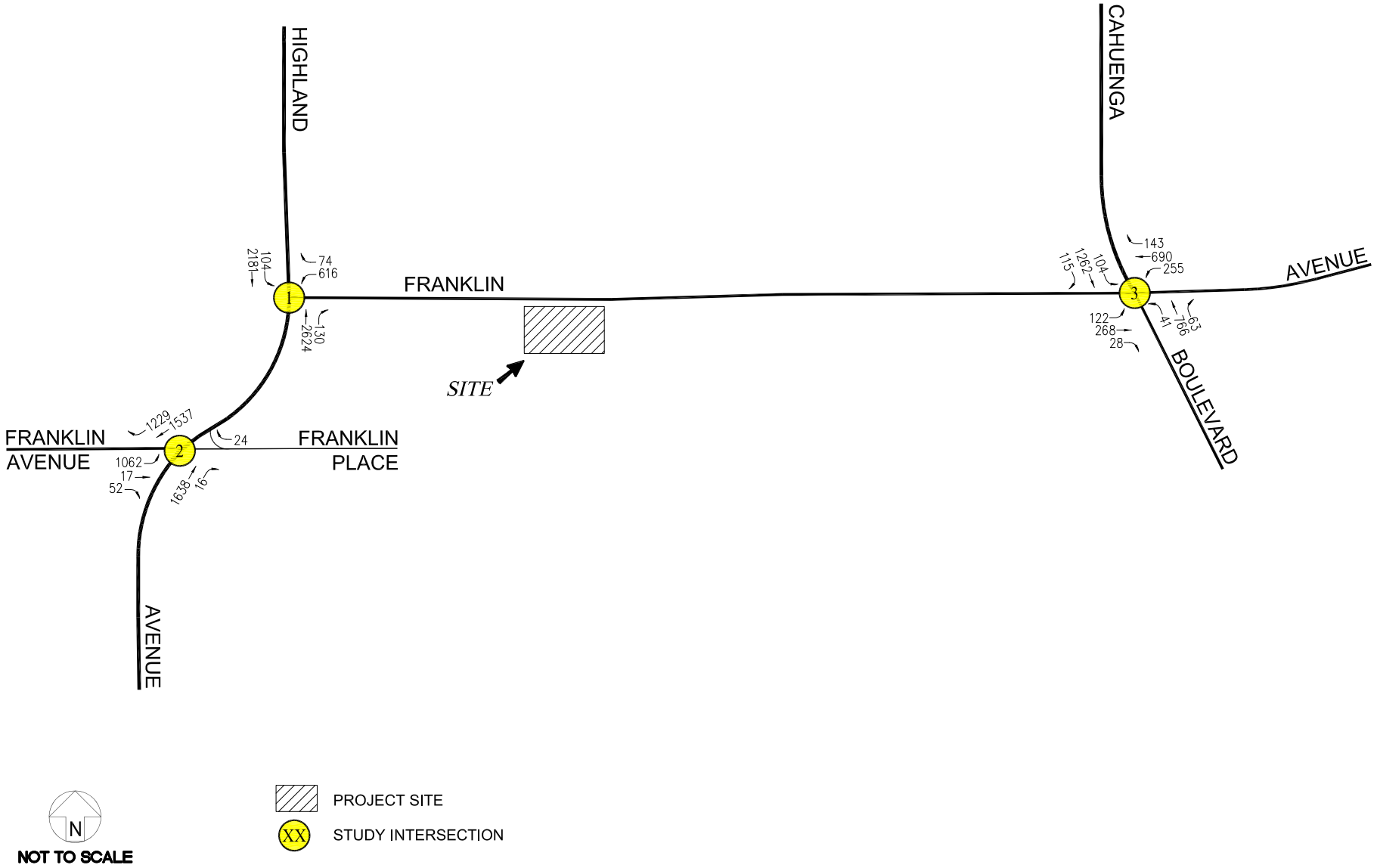
The Future with Project condition provided in **Table V-28** includes Project-related traffic added to the forecast future traffic volumes at the study intersections. As shown in column [4], the traffic impacts in the Future with Project condition will be less than significant for all study intersections with application of the City's thresholds. The Future with Project traffic volumes are provided on **Figure V-12, Future with Project Traffic Volumes, AM Peak Hour** and **Figure V-13, Future with Project Traffic Volumes, PM Peak Hour**.

In summary, the Project-related traffic impacts at the study intersections in the Existing with Project and Future with Project conditions during the weekday AM and PM peak hours are calculated to be less than significant based on the City's thresholds of significance. Therefore, no traffic mitigation measures are required or recommended for the Project.

Table V-28
Levels of Service Summary and Volume to Capacity Ratios AM and PM Peak Hours

	Intersection	Peak Hour	Existing		Existing with Project		Change	Significant	Future without Project		Future with Project		Change	Significant
			V/C	LOS	V/C	LOS	V/C	Impact?	V/C	LOS	V/C	LOS	V/C	Impact?
1	Highland Avenue/ Franklin Avenue	AM	0.824	D	0.825	D	0.001	NO	0.841	D	0.842	D	0.001	NO
		PM	0.768	C	0.769	C	0.001	NO	0.785	C	0.786	C	0.001	NO
2	Highland Avenue/ Franklin Avenue-Franklin Place	AM	0.719	C	0.719	C	0.000	NO	0.736	C	0.736	C	0.000	NO
		PM	0.175	C	0.715	C	0.000	NO	0.732	C	0.732	C	0.000	NO
3	Cahuenga Boulevard/ Franklin Avenue	AM	0.888	D	0.889	D	0.001	NO	0.908	E	0.909	E	0.001	NO
		PM	0.713	C	0.713	C	0.000	NO	0.730	C	0.730	C	0.000	NO

Source: LLG, 2016

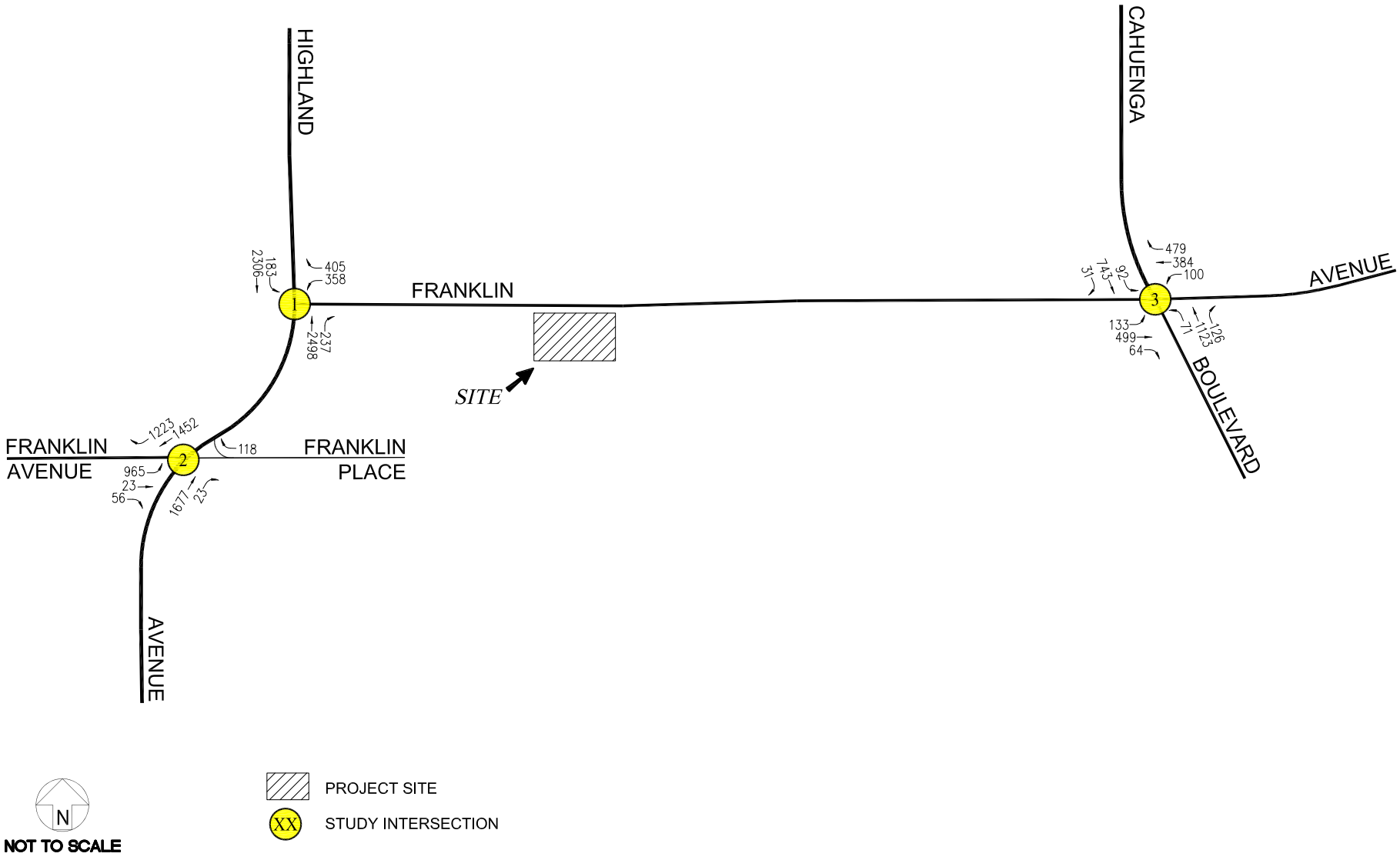


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-10**

IMPACT SCIENCES

Existing with Project Traffic Volumes AM Peak Hour

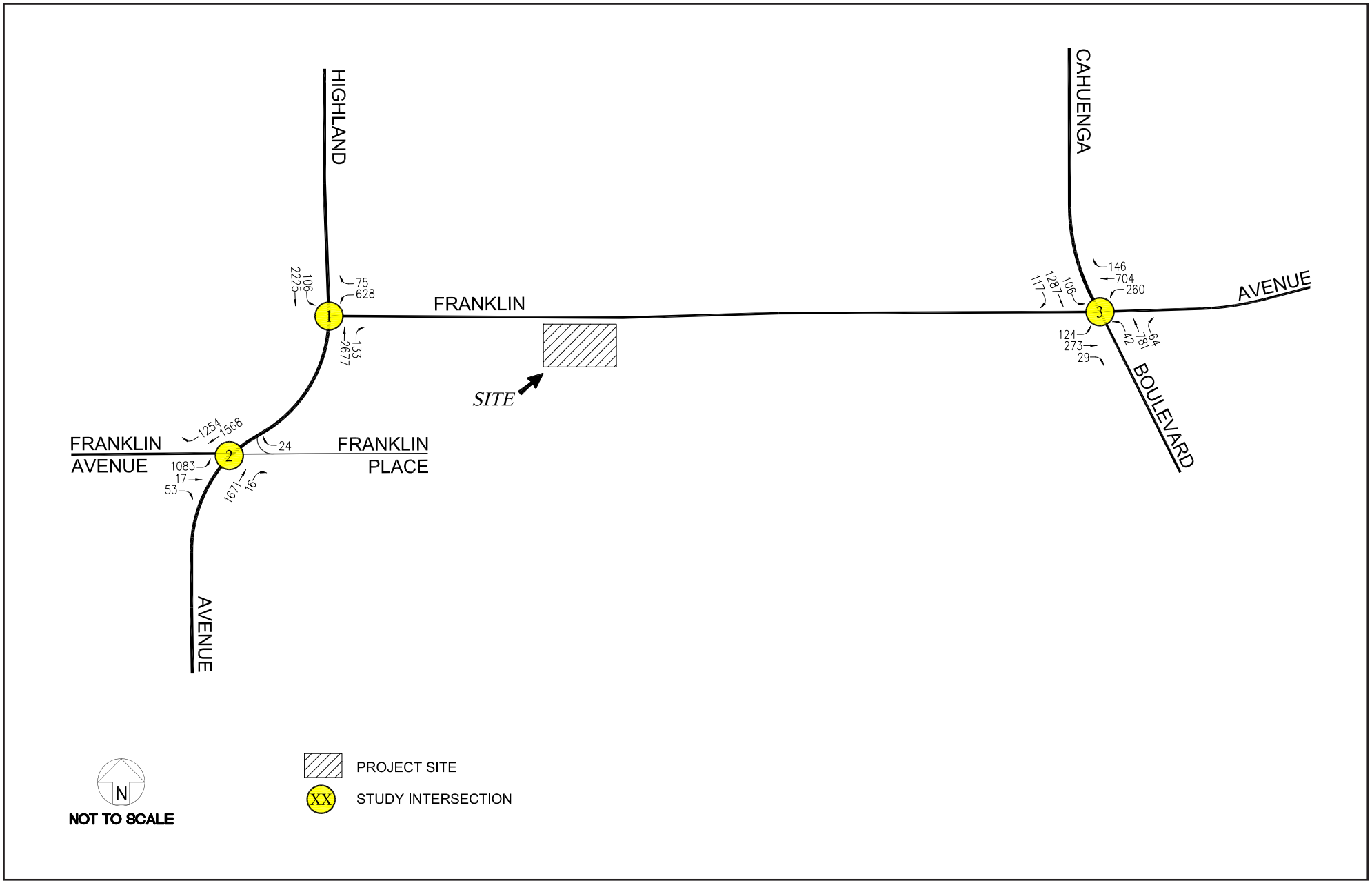


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-11**

IMPACT SCIENCES

Existing with Project Traffic Volumes PM Peak Hour

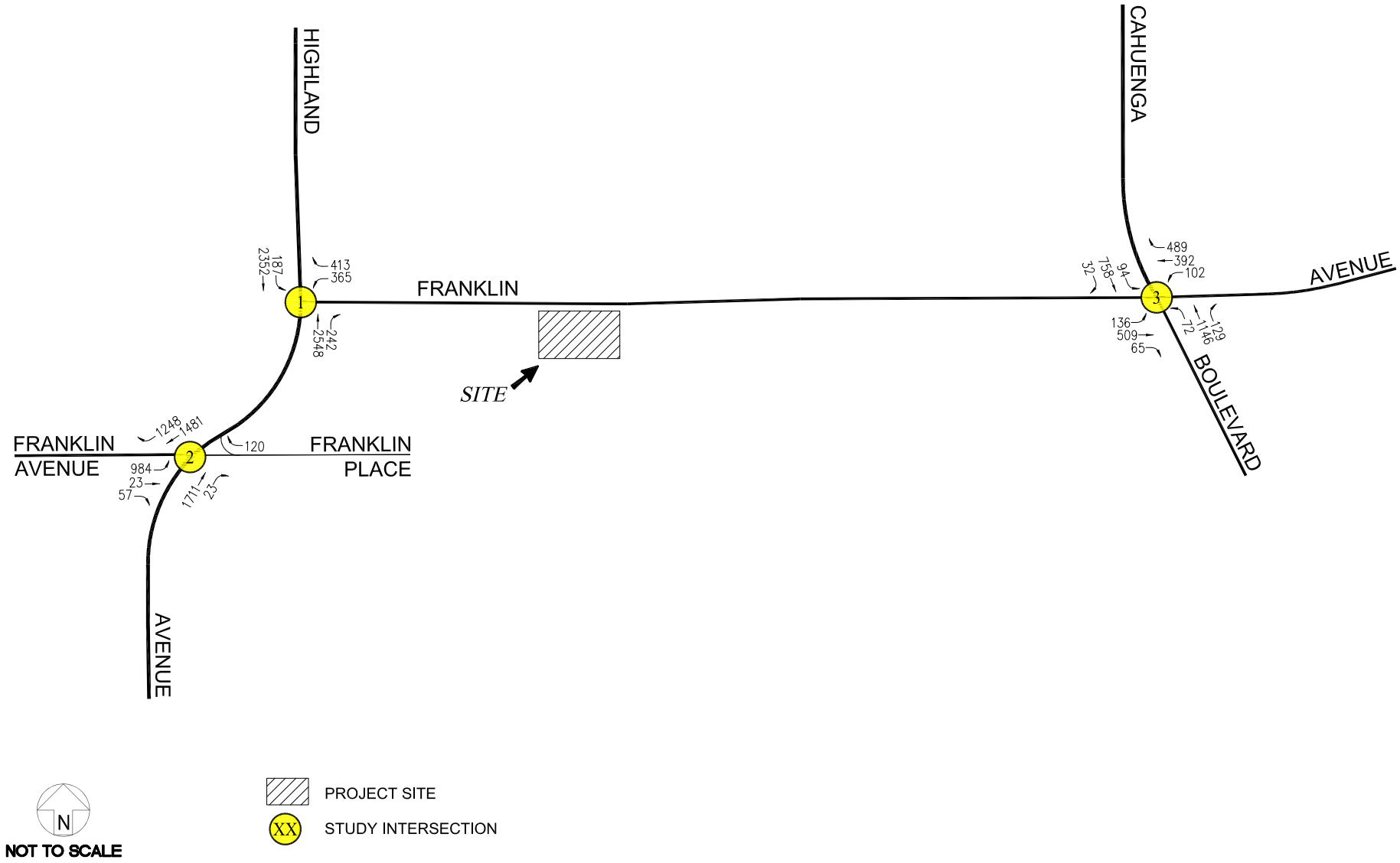


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-12**

IMPACT SCIENCES

Future with Project Traffic Volumes AM Peak Hour



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-13**

IMPACT SCIENCES

Future with Project Traffic Volumes PM Peak Hour

b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less than Significant Impact. The congestion management program (CMP) in effect in Los Angeles County was issued by the Los Angeles County Metropolitan Transportation Agency in 2010.

The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways plus all freeways comprises the CMP system. Per CMP Transportation Impact Analysis (TIA) Guidelines, a traffic impact analysis is conducted where:

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, where the Proposed Project will add 50 or more vehicle trips during either AM or PM weekday peak hours.
- At CMP mainline freeway-monitoring locations, where the project will add 150 or more trips, in either direction, during the either the AM or PM weekday peak hours.

Based on the project trip generation shown in **Table V-27**, it is not expected that 50 or more new trips per hour would be added at any CMP intersections, nor would the Proposed Project add 150 or more new trips per hour to any CMP mainline freeway monitoring locations. Therefore, impacts to a CMP would be less than significant and no further analysis is required.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. As previously stated in **Section 8, Hazards and Hazardous Materials** the nearest public airport is the Bob Hope Hope/Burbank Airport, located approximately 6.5 miles north of the Project Site. Los Angeles International Airport is approximately 12 mile southwest of the Project Site. The Santa Monica Airport, a private airport is located approximately 9.1 miles southwest of the Project Site. The Project Site is not located with an airport land use plan area or within two miles of an airport, therefore no change in air traffic patterns, including either an increase in traffic levels or a change in location would occur. No impact would occur and no further analysis is required.

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

Less Than Significant Impact with Mitigation. As per the existing condition, vehicular access to the Project Site will be provided with one full access driveway on the west side of Cherokee Street at Franklin Avenue. As such, the design of the Proposed Project would not cause a permanent alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. Further, the final design of the Proposed Project, including curb cuts, ingress, egress, and other streetscape changes, would be subject to review by the LADBS, Public Works and the Department of Transportation and would be required to comply with all requirements of those agencies.

Construction of the Proposed Project may require temporary lane or sidewalk closures. However, this impact will be reduced to a less than significant level by implementing following mitigation measure:

TRA-MM-1 Pedestrian Safety

- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

Following implementation of Mitigation Measure TRA-MM-1, impacts would be less than significant and no further analysis is required.

e) Result in inadequate emergency access?

Less Than Significant Impact. Hollywood Boulevard, Highland Avenue, and the Hollywood (US 101) Freeway are designated disaster routes in the General Plan Safety Element's Critical Facilities & Lifeline Systems Map (Exhibit H).[110] Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. The Safety Element emphasizes immediate emergency debris clearance and road/bridge repairs for short-term emergency operations along these routes.

Although the Project Site is located proximate a designated disaster route, neither the construction nor the operation of the Proposed Project would require or result in modifications to any of the roadways that would impact emergency traffic. Construction of the Proposed Project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan**,** and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response, and access during construction of the Proposed Project. The majority of construction activities for the Proposed Project would be confined to the site, except for infrastructure improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods.

In addition, the Applicant will submit a parking and driveway plan for review by the LAFD, the BOE and the LADOT to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access. Impacts would be less than significant and no further analysis is required.

f) Conflict with adopted polices, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. The Proposed Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan

110 *City of Los Angeles City Planning Department, Environmental and Public Facilities Maps, Critical Facilities & Lifeline Systems in the City of Los Angeles, September 1996,(General Plan Safety Element, Exhibit H: Critical Facilities & Lifeline Systems, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf).*

Transportation Authority (i.e., Routes 237 and 656 on Highland Avenue, 212, 217, 222, and 312 on Hollywood Boulevard) and LADOT DASH Hollywood. The project would promote other alternative transportation modes, including bicycles. The project would include bicycle parking spaces per the requirements of current code. The Proposed Project is also within walking distance to a variety of shops and services for residents (e.g., personal grooming services, medical/dental offices, restaurants, etc.). For these reasons, the Proposed Project would not conflict with adopted policies, plans, or programs of transportation facilities. Impacts would be less than significant, and no further analysis is necessary.

17. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resource 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).

Less than Significant Impact. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[111] Section 5020.1 of the PRC defines a historical resource as including, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. The Project site currently contains one structure, a 118-unit, 10-story residential apartment building of affordable senior housing. The building, known as the "Montecito Apartments" since its original construction in 1931, was listed in the National Register of Historic Places in 1985. With this designation, the building is considered a historical resource defined in Public Resource Code section 5020.1(k). However, pursuant to AB 52, the Department of City Planning notified Native American tribes as to the Project with a 30-day comment period on June 19, 2017. None of the tribes responded to the request within the statutory response period. Therefore, the potential impacts to tribal cultural resources on the Project site would be less than significant, and no mitigation would be required.

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.

Less Than Significant Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in PRC Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a

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111 *California Public Resources Code Section 21084.1*

TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As previously discussed under **Section 5.b)**, the Project Site does not contain any known archaeological sites or archaeological survey areas. In addition, the project would comply with the provisions of Sections 5097.98 and Section 21083.2 of the PRC, California Health and Safety Code Section 7050.5, and CEQA Guidelines Section 15064.5(e) which would protect any potential archaeological resources or human remains that are discovered during excavation.

Public Resources Code Section 21080.3.1 establishes a formal process for Lead Agencies to consult with California Native American Tribes to identify potential significant impacts to TCRs, as defined in PRC Section 21074.

The geographic area of the Project Site is not known to contain any TCRs. Nevertheless, the Los Angeles DCP mailed notices to Native American tribes known to be traditionally and culturally

affiliated with the project area on June 19, 2017, requesting that they respond within 30-days if they wished to open a formal consultation process with the City. None of the tribes responded to the request.

The copy of this correspondence is included in the public record as **Appendix H**, and provided to the decision makers.

With the completion of the outreach to the tribes for consultation, impacts would be less than significant, and no other mitigation is required.

18. UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than significant impact. Wastewater generated in the City is treated at the Hyperion Treatment Plant in Playa del Rey. The Regional Water Quality Control Board RWQCB) regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The Hyperion Treatment Plant is responsible for adhering to RWQCB regulations as they apply to wastewater generated by the Proposed Project. Operation of the Proposed Project could increase the amount of wastewater that would need to be treated at the Hyperion Treatment Plant.

Wastewater reclamation plants that comprise the Hyperion Service Area have a total design capacity of 580 million gallons of wastewater per day (MGD). The City of Los Angeles Integrated Resources Plan indicates by the year 2020, projected wastewater flows will increase 16 percent to total approximately 531 MGD.[112] Based on current design capacity of the Hyperion Service Area wastewater reclamation plants, the Bureau would have ample capacity in the current wastewater treatment system.

On average, the Proposed Project would generate an average daily flow of approximately 30,800 GPD, as shown in **Table V-29, Projected Wastewater Discharges for the Proposed Project.**

Table V-29
Projected Wastewater Discharges for the Proposed Project

Land Use	Size	Generation Rates (GPD)	Total Wastewater Generation (GPD)
Residential:			
Studio	32 DU	75 GPD/DU	2,400
1-Bdrm	36 DU	110 GPD/DU	3,960
Total			**6,360**

Source: LA Sanitation Wastewater Engineering Services Division
GPD – gallons per day
du = dwelling unit

112 City of Los Angeles, Department of Public Works, Bureau of Sanitation, Integrated Resources Plan Executive Summary, December 2006, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010372.pdf

Currently, the Hyperion Water Plant has a capacity of 450 MGD. On average, the Hyperion Water Plant receives a flow of 275 MGD, thus resulting in available capacity of 175 MGD.[113] The net increase of 6,360 GPD from the Proposed Project would not significantly impact the Hyperion Water Plant. Impacts would be less than significant, and no mitigation would be required.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than significant impact. The City of Los Angeles Department of Water and Power (LADWP) will provide water service to the Project Site. Water is conveyed to users in the project area along several circulating water mains of varying sizes. The Proposed Project would be required to connect to existing mains around the project area. As discussed above in **Section 17(a),** wastewater generated on the Project Site would be treated at the Hyperion Treatment Plant.

The LADWP Urban Water Management Plan provides historical and forecasted water demands for the City of Los Angeles. Total water demand varies annually and is contingent on various factors including: population growth, weather, water conservation, drought, and economic activity. **Table V-30, Historical Water Demand for LADWP's Service Area** shows the previous breakdown of average water use through 2014.

[113] County of Los Angeles Department of Public Works, LA Sanitation website, Hyperion Water Reclamation Plant, 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-hwrp?_adf.ctrl-state=hy5nte6s8_4&_afrLoop=30433509942992750#!, accessed July 15, 2017

Table V-30
Historical Water Demand for LADWP's Service Area

Fiscal Year	Single Family	Multi-Family	Commercial	Industrial	Government	Non-Revenue	Total
2011-2014	209,651	165,364	98,994	17,663	42,543	32,774	566,990
2006-2010	236,154	180,277	106,964	23,196	42,956	30,617	620,165
2001-2005	239,754	190,646	109,685	21,931	41,888	52,724	656,628
1996-2000	222,748	191,819	111,051	23,560	39,421	33,696	622,295
1991-1995	197,322	177,104	110,724	21,313	38,426	39,364	584,253
24-Year Average	221,126	181,042	107,484	21,533	41,047	39,100	611,331

All units, except those in the Fiscal Year column, are in acre feet.
Source: Los Angeles Department of Water and Power, Urban Water Management Plan 2015, Exhibit ES-F

By analyzing historical demand, LADWP has forecasted water supply and demand projections in five year increments for each of the major categories of water uses. The point of forecasting water demand is to allow LADWP to better understand trends in water use, develop effective conservation programs, and invest appropriately in water supply development projects. The Urban Water Management Plan expects adequate water supplies would be able to their service area under normal, single-dry, and multi-dry year conditions through the year of 2040.

Table V-31
LADWP Forecasted Water Supply Availability Under Average Weather Conditions

Fiscal Year	Single Family	Multi-Family	Commercial/ Government	Industrial	Non-Revenue	Total
2020	222,958	184,679	148,600	18,869	36,709	611,800
2025	224,729	206,065	155,994	19,235	38,682	644,700
2030	226,770	211,454	156,788	18,701	39,173	652,900
2035	231,776	216,071	156,186	18,104	39,711	661,800
2040	231,767	216,071	156,186	18,104	39,711	675,700

All units, except those in the Fiscal Year column, are in acre feet.
Source: Los Angeles Department of Water and Power, Urban Water Management Plan 2015, Exhibit ES-S

As shown in **Table V-32, Projected Water Demand for the Proposed Project**, at buildout the Proposed Project would require approximately 7,632 gallons of water per day. The methodology to arrive at this amount is consistent with LADWP sewage generation rates established by the City of Los Angeles Bureau of Sanitation for expected wastewater demand, then extrapolating using guidance from the L.A. CEQA Thresholds

Guide 2006, Exhibit M.2-12, in which water consumption is assumed to be 120 percent of wastewater generation.

Table V-32
Project Estimated Water Demand

Land Use	Size	Generation Rates (GPD)	Water Demand (GPD)
Residential:			
Studio	32 DU	90 GPD/DU	2,880
1-Bdrm	36 DU	132 GPD/DU	4,752
		Total Water Demand	**7,632**

Source: LA Sanitation Wastewater Engineering Services Division, consistent with the City of L.A. CEQA Thresholds Guide 2006, Exhibit M.2-12, water consumption is assumed to be 120 % of wastewater generation.
GPD – gallons per day
sq. ft. – square feet
du = dwelling unit

Based on the 2015 UWMP water demand projections through 2040, projected water demand for the City would be met with adequate supply under average weather conditions through the year of 2040 and intervening years. The Project would result in an estimated net increase in water demand of approximately 8.55 acre-feet per year, which would comprise approximately 0.003 percent of the water demand for the City in 2020.

The project would not significantly affect existing on-site water and wastewater lines and/or off-site wastewater and water facilities. No mitigation is required.

c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, requiring the construction of new stormwater drainage facilities.

As described in Section 9(e), the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity.

During the project's construction phase, the Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City of Los Angeles Bureau of Engineering (BOE) for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, project construction impacts related to stormwater discharge would be less than significant, and no further analysis of this issue is required.

During the Project's operational phase, in accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the project would meet the City's water quality standards. Therefore, project impacts related to operational stormwater discharges would be less than significant.

No further analysis of this issue is required.

d) Have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact. Water supply to the Project Site is provided by the LADWP.[114] Buildout of the Proposed Project would create an increase in demand for

[114] *Includes imported water.*

water supplies compared to existing conditions on the Project Site. But as mentioned in **17(b),** there would be sufficient capacity in water supply to be able to accommodate the Proposed Project without new or expanded entitlements. Impacts would be less than significant, and no further analysis is required.

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

Less Than Significant Impact. See **Response 17(a)** and **17(b)**, above.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide,* the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the City's Source Reduction and Recycling Element (SRRE) or its updates, the Storm Water Management Program Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

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

Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to

achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030. State law (AB 341) currently requires at least 50 Percent solid waste diversion and establishes a state-wide goal of not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[115]

Moreover, State law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multifamily solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 72.6 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 22 years. An expansion of the Chiquita Canyon Landfill was recently approved by the Los Angeles County Board of Supervisors which will boost the daily disposal tonnage from 6,000 to 12,000 tons, the weekly disposal tonnage from 30,000 to 60,000 tons and the maximum amount of tonnage from 23 million to 60 million tons, extending the estimated remaining life of the landfill to 30 years.[116]

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition

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115 *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

116 *http://www.waste360.com/design-and-construction/waste-connections-chiquita-canyon-landfill-battle-explained*

debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. As summarized in **Table V-33**, **Estimated Construction Solid Waste Generation below**, it is estimated that approximately 119.15 tons of solid waste would be generated by the Project's construction activities. This represents a tiny fraction of the Sunshine Canyon Landfill's existing remaining disposal capacity of 72.6 million tons. Moreover, as of January 1, 2011 all contractors operating within the City of Los Angeles are required to source separate materials on site for recycling and/or use a permitted private waste hauler to deliver mixed materials to a certified processor for recycling. Thus, only a fraction of the construction and demolition debris would end up in regional landfills.

Table V-33
Estimated Construction Solid Waste Generation

Land Use	Size	Generation Rates (lbs/sf)[a]	Total Waste Generation (tons)
Multi-family units	68 du/32,560 sf	4.38	71.31
Parking	23,800 sf	4.02	47.84
Total			**119.15**
Total with 50 percent recycling			**59.58**

Notes:
a - U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-4, June 1998. Construction debris is based on gross building area and thus exceeds the buildable floor area for purposes of calculating FAR.
lbs = pounds
sf – square feet
du = dwelling unit
Source: Impact Sciences, 2017.

At buildout, the Proposed Project would generate approximately 272 pounds of waste per day or approximately 49.64 tons of solid waste per year as shown in **Table V-34, Projected Daily Solid Waste Generation.** According to the 2015 Los Angeles County Integrated Waste Management Plan (IWMP), the total remaining capacity of the landfills is approximately 114 million tons.[117] The 49.64 tons per year generated during operation of the Proposed Project (not including the 50 percent diversion rate) would represent 0.00004 percent of the remaining capacity at the landfills which currently accept solid waste from the city. Therefore, the residential uses associated with the Proposed Project would not result in a significant impact towards landfill capacity. Impacts would be less than significant, and no further analysis is required.

117 *County of Los Angeles, Department of Public Works, 2015 Annual Report, Los Angeles County Wide 1ntegrated Waste Management Plan, December 2016.*

Table V-34
Projected Daily Solid Waste Generation

Land Use	Size	Generation Rates (lbs/day)	Total Waste Generation (lbs/day)	Total Waste Generation (tons/year)
Multi-family units	68 du	4 lbs/dwelling unit/day	272.0	49.64
Total			272.0	49.64
Total with 50 percent recycling			136.0	24.82

Source: CalRecycle Estimated Solid Waste Generation Rates for Commercial, Service, and Residential uses, http://www.calrecycle.ca.gov/wastechar/wastegenrates/Service.htm, accessed June 21, 2017.
Notes:
du = dwelling unit
Source: Impact Sciences, 2017.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The California Integrated Waste Management Act of 1989 (AB 939) was the first recycling legislation in the country to mandate recycling diversion goals. AB 939 required all California cities, counties and approved regional solid waste management agencies responsible to enact plans and programs to reduce waste disposal. Jurisdictions were required to meet diversion goals of 50% by the year 2000 and a statewide goal of 75% by 2020. In 2007, the City of Los Angeles initiated a Solid Waste Integrated Resource Plan (SWIRP) with goals of moving toward zero waste by 2030. Under the City's RENEW LA Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030. As reported by the Bureau of Sanitation in 2009, the City had achieved a waste diversion rate of 65%. The City is exceeding the state-mandated diversion goal of 50% by 2000 set by the California Integrated Waste Management Act (AB 939) of 1989.[118] The Proposed Project would be required to comply with applicable regulations regarding solid waste disposal. The Proposed Project's potential impacts associated with federal, state, and local statutes and regulations related to solid waste will be analyzed.

118 *City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June, 14 2005.*

19. MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant Impact. As discussed in **Section 4, Biological Resources,** the project would not impact any endangered fauna or flora. Further, because of the highly urbanized nature of the Project Site and the surrounding area, construction and operation of the Proposed Project would not impact the habitat or population of the Project Site and the surrounding area, the project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in **Section 5, Cultural Resources** potential impacts related historical, archaeological, and paleontological resources would be less than significant following the implementation of the regulatory compliance measures. No further analysis is required.

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

Less Than Significant Impact. Based on the proceeding discussions, no significant impacts were identified for the 18 environmental factors analyzed above. As the Proposed Project would not result in any unmitigated significant impacts, there would be no cumulative impacts. No impact would occur and no further analysis is required.

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

Less Than Significant Impact. As identified throughout the analysis, the Proposed Project would not have an environmental effect that would cause substantial adverse effects on human beings directly or indirectly. Impacts would be less than significant and no further analysis is required.