SECTION 5
Sustainable Communities Environmental Impact Analysis

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist as adjusted for use as a Sustainable Communities Environmental Assessment (SCEA) pursuant to Public Resources Code (PRC) Sections 21155.2(b) and 21159.28. This analysis assumes all applicable MMs from the RTP/SCS are incorporated. Where applicable, project specific project design features (PDFs) and/or mitigation measures are identified in the analysis to help reduce or avoid significant impacts on the environment.

5.1 Aesthetics

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under CEQA for several categories of development projects including the development of infill projects in transit priority areas (TPAs). Public Resources Code Section 21099 (a)(7) defines a TPA as an area located within 0.5 miles (2,640 feet) of a major transit station that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." A major transit stop is 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.[1]

PRC Section 21099(d)(1) states that a project's aesthetic impacts shall not be considered a significant unavoidable 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.

Further provisions of SB 743 provide that this legislation "does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies (PRC Section 21099(d)(2)(A)), and that aesthetic impacts do not include impacts on historical or cultural resources (Section 21099(d)(2)(B)). Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2452 states that visual resources, aesthetic character, shade and shadow, light and glare, and

[1] The City of Los Angeles defines Peak Periods to be between 6:00 to 9:00 a.m. and 3:00 to 7:00 p.m. https://planning.lacity.org/ordinances/docs/toc/TOCGuidelines.pdf. Accessed November 21, 2018.

scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within TPA pursuant to CEQA. The City of Los Angeles Zoning Information File ZI No. 2452 also notes that the limitation of aesthetic impacts pursuant to PRC Section 21099 does not include impacts to historic or cultural resources. Therefore, under ZI No. 2452, impacts to cultural resources, such as historical buildings and districts will need to be evaluated pursuant to CEQA regardless of project location.

The Project would be a mixed-use, infill project located in a TPA. The Project Site is located less than 0.25 mile from the Wilshire/Vermont Metro Rail Station that serves the Metro Red Line and Purple Line, which operate with average service intervals of 10 minutes in each direction during the morning and afternoon peak hours. In addition, Metro Local Routes 18, 20, 51, 52, and 204 and Metro Rapid Routes 720 and 754, all operate bus routes with average service intervals of less than 15 minutes and are located within 0.5 mile of the Project Site.

Because of the mixed-use residential character of the Project and its location within an urban TPA, the Project's aesthetic impacts are not considered significant. Nonetheless, the Project is evaluated under the respective Initial Study questions herein for **disclosure/informational purposes only**.

Except as provided in Public Resources Code Section 21099, would the project:

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

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Less Than Significant Impact. A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. Scenic vistas are generally associated with public vantages. A significant impact may occur if the Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially alters a view of a scenic vista.

The Project Site is in a highly urbanized area surrounded by a mix of land uses, including commercial, office, residential, as well as institutional and school facilities with various architectural styles and building heights. To the west of the Project Site, along Shatto Place, land uses include office and creative office development, surface parking, a parking structure, and adult educational uses such as Nobel University. The Project Site is bordered to the north along Shatto Place by office and multifamily housing. To the east, along South Westmoreland Avenue, uses include multifamily residential, commercial and office development. To the south of the Project Site, along West 6th Street, land uses include various commercial and office uses and related surface parking. Southwest of the Project Site, is Young Oak Kim Academy middle school.

The Project Site is developed with a private school that utilizes various buildings on the Project Site including a "L-shaped" two-story former church building constructed in 1936 that fronts West 6th Street, a one-story school classroom building, a two-story classroom building, restroom and storage facilities, and surface parking. The former church building's western and southern facades have a distinctive Spanish Colonial Revival architecture and is positive visual presence

on the Project Site. The Project Site is not accessible to the general public and the perimeter is surrounded by metal security fencing.

The Project Site does not include any public vantages of any scenic vistas. Although located in a highly urbanized setting, there are a number of open space and parks in the area that are scenic resources. These include the Shatto Recreation Center and Park located 0.2 miles to the north and Lafayette Park located 0.22 miles to the southeast.

In addition, directly to the northeast of the Project Site is a privately commissioned mural associated with the creative office space located at 515 Shatto Place. The building's exterior has been adorned with a scenic three-paneled mural by street artist Fin Dac. The piece, known as "Nabi Sonyeo," covered in netting and mounted with over 90 hand-cut butterflies.[2] Overall, no notable public scenic vistas of these scenic resources described above are currently available across the Project Site. Due to distance, topography, and intervening development, there are no public scenic vistas across the Project Site of scenic resources such as the Shatto Recreation Center and Lafayette Park. As the private mural "Nabi Sonyeo" is located mid-block between 5th Street and 6th Street and surrounded by development, views of the mural are only available directly in front of the mural along Shatto Place. As the Project would be located across the street from the mural, the Project would not impede or obscure public views of the mural.

Conclusion:

Impacts would be less than significant and no mitigation measures are required. Consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to scenic resources or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

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

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No Impact. The Project is located within a dense, urban setting. State scenic highways are regulated by the California Department of Transportation under the California Scenic Highway Program. There are no state-designated scenic highways in the vicinity of the Project Site.[3]

Conclusion:

The Project would have no impact to existing scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state-designated scenic highway. No mitigation is required.

[2] https://urbanize.la/post/creative-office-space-opens-koreatown. March 30, 2018. Accessed October 25, 2018.

[3] City of Los Angeles Department of City Planning, Mobility Plan 2035, 2016.

Consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to scenic resources or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

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

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Less Than Significant Impact. The existing visual character of the Project Site is located in a highly urbanized area, surrounded by a varied of land uses including office, commercial, residential, and institutional uses. As stated earlier, the Project Site is currently developed with various school-related buildings and surface parking surrounded by metal fencing.

The Project Site is in an urbanized area and would not conflict with applicable zoning and regulations that govern scenic quality as discussed in **Table 5-1**, *Comparison of the Project to the Applicable Design Related Goals, Policies, and Objectives of the City of Los Angeles General Plan Framework Element, Wilshire Community Plan, and Citywide Design Guidelines*. The Project is designed to integrate the new mixed-use building and the former church building into a cohesive, pedestrian-friendly environment that would enliven the street front along West 6th Street with a ground level restaurant and outdoor patio, ground level office uses, , perimeter landscaping, and at-grade and subterranean parking that is hidden from the street. At the corner of West 6th Street and Shatto Place, a new street level public plaza area would include landscaping, public art, and a water feature serving to activate the street; providing a public benefit and serving as a key visual Project component. In addition, the metal fencing that surrounds the Project Site would be removed; opening the Project Site up physically and visually to the public.

The Project would however upgrade the visual character by providing new trees and landscaping along the Project perimeter. Native and drought tolerant plants would also be used to reduce water requirements, but would express the rich California planting palette. Along the street front, the new landscaping would serve to create an inviting pedestrian environment. A landscaped area, open space, and dog run area would be provided on the north side of the Project that also serve as a buffer area from the office uses to the north. Landscaping, open spaces, and trees would be provided along the eastern portion of the Project Site providing a buffer from the residential and commercial uses to the east. The building materials include concrete with painted concrete balcony slabs clad in a prefinished aluminum window system with double-glazed vision glass units, and opaque spandrel units.

TABLE 5-1
COMPARISON OF THE PROJECT TO THE APPLICABLE GOALS, POLICIES, AND OBJECTIVES OF THE CITY OF LOS ANGELES GENERAL PLAN FRAMEWORK ELEMENT, WILSHIRE COMMUNITY PLAN AND CITYWIDE DESIGN GUIDELINES

Goal/ Policy/Objective	Analysis of Project Consistency
City of Los Angeles General Plan Framework Element	
Urban Design	
Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.	**Consistent.** While it is the City's responsibility to meet this goal in general, the Project would provide a new mixed-use development that would include residential, office, and commercial uses. The Project would increase the housing choices for residents residing in the Wilshire Community Plan area and throughout the City of Los Angeles. The location of the Project adjacent to rail and bus service would increase housing opportunities for those wishing to reside near public transportation. As such, the Project would support the policy of creating a livable City for existing and future residents and attract further investment in the area.
Policy 8.3.13: Enhance pedestrian circulation in neighborhood districts, community centers, and appropriate locations in regional centers and mixed-use boulevards.	**Consistent.** The Project is currently occupied by school uses that is surrounded by perimeter fencing. The Project would remove the school uses and surrounding fencing and would activate the streetscape by creating a new mixed-use Project with ground floor office and commercial uses. New commercial uses in the repurposed church building would be located at the corner of Shatto Place and 6th Street; a highly visible street corner surrounded by complementary uses such as services, commercial, office, residential, and school uses. Ground floor office uses would be located along Shatto Place, adjacent to existing office and commercial uses. The Project would also provide a street-level public pedestrian plaza at the corner of Shatto Place and 6th Street, new street-level landscaping and street trees and an overall increase in landscaping on the Project Site. As such, the Project would enhance pedestrian circulation surrounding the Project Site.
Land Use	
Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**Consistent.** While it is the City's responsibility to meet this objective in general, the Project orients ground-level commercial at the corner of Shatto Place and 6th Street and ground floor office uses along Shatto Place, which are active streets that include nearby office, commercial and educational uses. The Project would also provide a street-level public pedestrian plaza at the corner of Shatto Place and 6th Street, new street-level landscaping and street trees and an overall increase in landscaping on the Project Site. As such, the Project would enhance pedestrian activity surrounding the Project Site.
Wilshire Community Plan	
Commercial	
Objective 2-2.1: Encourage pedestrian-oriented design in designated areas and in new development.	**Consistent.** The Project encourages pedestrian activity by locating new residents, employees and visitors in close proximity to public transit and services. Project residents, employees and visitors would have the option to walk, ride bicycles or use public transit to access jobs and services in the surrounding neighborhood and nearby centers such as Downtown Los Angeles. The Project would also provide a street-level public pedestrian plaza at the corner of Shatto Place and 6th Street, new street-level landscaping and new trees. As such, the Project would enhance pedestrian realm surrounding the Project Site.

Goal/ Policy/Objective	Analysis of Project Consistency
Policy 2-2.3: Encourage the incorporation of retail, restaurant, and other neighborhood serving uses in the first floor street frontage of structures, including mixed use projects located in Neighborhood Districts.	**Consistent.** The Project would be a mixed-use development with ground floor commercial uses and amenities, landscaping and would include a public plaza. The new commercial development would include neighborhood-serving restaurant uses that would front 6th Street and Shatto Place.
Residential	
Objective 1-3: Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	**Consistent.** The Project is in a mixed-use area surrounded immediately by office, residential and commercial uses. The use and character of the Project is consistent with the surrounding active mixed-use urban land uses and would provide housing opportunities outside of any low density neighborhoods.
Historic and Cultural Resources	
Policy 17-1.1: Encourage the preservation, maintenance, enhancement and reuse of existing historic buildings and the restoration of original facades.	**Consistent.** Located on the Project Site is a 1936 former church building currently used for school-related uses. As discussed under Item 5.5.a and the Historical Resource Assessment Report prepared for the Project, the former church building was identified by SurveyLA as significant for its Spanish Colonial Revival architecture, which is expressed primarily on the west and south façades, facing Shatto Place and 6th Street respectively. Therefore, the former church building is treated as a historical resource as defined by CEQA. The Project would repurpose and revitalize the former church building into a more active use as a restaurant that would feature a new outdoor patio and seating area that would enliven the street front along West 6th Street. At the corner of West 6th Street and Shatto Place in front of the former church building, a new street level public plaza area is proposed. The plaza would include landscaping, public art, and a water feature serving to activate the street and visually frame the former church building. In addition, the metal fencing that surrounds the Project Site and the former church building would be removed; opening up the former church building up physically and visually to the public. The proposed alternations would have no impact on the former church building's Spanish Colonial Revival façades, and the former church building's noted historical architecture features would remain unaltered. As such, former church building would remain eligible for historic designation as identified in SurveyLA.
Citywide Design Guidelines	
Objective 1: Consider Neighborhood Context & Linkages in Building & Site Design	**Consistent.** The Project has sensitively considered the neighborhood context in determining the massing design of its various components. The former church building used for school uses, would be repurposed into a more active use as a restaurant that would feature a new outdoor patio and seating area that would enliven the street front along West 6th Street. At the corner of West 6th Street and Shatto Place, a new street level public plaza area would include landscaping, public art, and a water feature serving to activate the street; providing a public benefit and serving as a key visual Project component. Along Shatto Place, the new mixed-use building would feature four small office spaces with landscaped patios which would provide a transition of scale and serve as a setback between the street level and the taller residential tower. The residential tower is designed in a series of checkered frames that break up the form and height of the tower.

Goal/ Policy/Objective	Analysis of Project Consistency
Objective 2: Employ Distinguishable and Attractive Building Design	**Consistent.** The Project includes distinguished and attractive design elements and features. The Project would include new ground level office, commercial uses and amenities, including new street trees, a plaza, and landscaping. The building materials include concrete with painted concrete balcony slabs clad in a prefinished aluminum window system with double-glazed vision glass units, and opaque spandrel units. The mixed-use tower would be setback from both Shatto Place and West 6th Street to the northeast corner of the Project Site. As a result, the taller scale of the building presence is minimized from the street front and the distinctive and smaller scale former church building retains its visual presence on the Project Site. The Project would provide new trees and landscaping along the Project perimeter. Native and drought tolerant plants would be used to reduce water requirements, but would express the rich California planting palette. Along the street front, the new landscaping would serve to create an inviting pedestrian environment.
Objective 3: Provide Pedestrian Connections Within and Around the Project	**Consistent.** The Project would provide a mix of land uses in proximity to a broad range of land uses and transit options within walking distance, which would stimulate pedestrian activity. The Project would be integrated with the surrounding sidewalks through new ground level office, commercial uses and amenities, including new street trees, a plaza, and landscaping. Pedestrian connections would be provided throughout the Project Site, connecting residential, office and common open spaces uses such as the public plaza.
Objective 4: Minimize the Appearance of Driveways and Parking Areas	**Consistent.** Parking for the Project would be located underground in a subterranean parking structure and within four at-grade space units would be provided for the townhouse units directly behind the townhomes. As such parking areas would not be visible from the street. Parking and loading for the restaurant and mixed-use building would occur on the east side of both buildings near the Project Site's eastern boundaries and would not be directly adjacent to the street front. As such, the appearance of parking and driveways would be minimized.
Objective 5: Utilize Open Areas and Landscape Opportunities to their Full Potential	**Consistent.** As currently designed, the Project would provide 21,450 square feet (sf) of credited open space, and would be compliant with open space requirements. Specifically credited open space and amenities provided as part of the Project would include open space and a dog run area on the ground floor, amenity decks on levels two and 30, interior common open space and 10,700 sf of open space as private balconies. The Project would also provide an additional 16,200 sf of uncredited open space which would include a ground floor plaza, amenities on level 2 and level of 30 of the new mixed-use building and a rooftop amenity deck and pool.
Objective 6: Improve the Streetscape Experience by Reducing Visual Clutter	**Consistent.** Building identification signage for the ground level commercial use would be visible from Shatto Place and West 6th Street but would not dominate or obscure the architectural elements of the new building or former church building. The Project would not include any billboards or off-site signage.

SOURCE: ESA, 2019.

Los Angeles Municipal Code

Zoning, Floor Area and Density

The LAMC implements the City's General Plan Framework and Wilshire Community Plan's goal and policies regarding scenic quality through detailed development regulations including permitting specific land use types, building heights, and density at the parcel level. These regulations help to define the urban form of specific areas of the city from high-rise, mixed-use urban neighborhoods to low-rise suburban and rural areas. Pursuant to the voter-approved Measure JJJ of the Los Angeles Municipal Code (LAMC), Section 12.22-A.31 was added to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program. The TOC Affordable Housing Incentive Program guidelines provide for eligibility standards, incentives, and other necessary components for all housing developments that provide a minimum number of On-Site Restricted Affordable Units and that are located within a 0.5-mile radius of a Major Transit Stop. LAMC Section 12.22-A.31 provides for Base and Additional Incentives for projects in lots based on the proximity of Major Transit Stops and classifies these lots into specific Tiers.

The Project Site straddles two different zones. The northern two parcels, where the new building would be developed, is zoned CR-1. The parcel on the southern portion of the Project Site occupied by the former church building is zoned C2-1. Both the CR-1 and C2-1 zones have a permitted FAR of 1.5:1. The total allowable base dwelling units on the Project Site is 141 units.

Per the TOC Tier 4 guidelines, the Project Site is permitted a FAR of up to 4.25 times the Buildable Area of the Project Site and an increase in base density of 80 percent for eligible Tier 4 projects in exchange for the provision of affordable housing units. The Project would be consistent with the Tier 4 requirements of LAMC Section 12.22-A.31 as it is located within 750 feet of a train line or rapid bus stop and it would set aside 11 percent of the total number of its residential units (29 units of the 256 units) as affordable for Extremely Low Income households.

Therefore, the permitted Buildable Area for the Project Site is 55,469 sf (22,961 sf within the C2-1 zoned portion of the property and 32,508 sf within the CR-1 portion), which permits a maximum total of 235,744 sf of floor area and 256 dwelling units.

The Project would meet these requirements as it would include a maximum total of 235,744 sf of floor area (4.25:1 FAR) and would include 256 housing units. The Project conforms with the underlying zoning regulations.

Setbacks

As it relates to scenic quality, building setback requirements, as implemented through the LAMC, help to maintain adequate light and air between adjacent properties and depending on the specific area or zone, setbacks provide for open space that helps define how a building relates to the public realm of the street or the private realm of adjacent properties. Various setback requirements help new development blend and respond to the surrounding urban form; improving the scenic quality of the built environment.

Pursuant to TOC Tier 4 guidelines, developments may utilize any or all of the yard requirements for the RAS3 zone. As such the Project is permitted additional incentives for rear and side yard setbacks to be consistent with the RAS3 zone per LAMC Section 12.10.5.

As such, for commercial uses no ground floor setbacks are required. For the residential uses, 5-foot side and rear setbacks are required. The Project would meet the requirements of the RAS3 zone, by providing the required 5-foot side and rear yards for the residential uses.

The Project also conforms with the setback requirements.

Open Space

As it relates to scenic quality, LAMC Section 12.21-G requires that open space be provided with the development of new residential uses. This supports development of a healthy and sustainable city and ensure residents have access to adequate light, air, open space, and recreational facilities. Open space areas incorporated within new development such as courtyards, open green areas, gardens, landscaping, plazas, and other open space amenities also contribute positively to the design and scenic attributes of a project.

LAMC Section 12.21-G requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 sf for each unit having less than three habitable rooms, 125 sf for each unit having three habitable rooms, and 175 sf for each unit having more than three habitable rooms.

Therefore, the Project would be required to provide 28,600 sf of open space for the Project's maximum 256 units (152 units with less than 3 habitable rooms, 96 units with 3 habitable rooms, and 8 with more than three habitable rooms).

Per the TOC Tier 4 guidelines, the Project would be eligible for a 25 percent decrease in the open space requirement. Therefore, the open space requirement for the Project would be 21,450 sf.

The Project would provide up to the required 21,450 sf of credited open space of which 10,700 sf would be private balconies. As currently designed, the Project would an additional 42,775 sf of uncredited open space, consisting of landscaped space at the ground level, gym/fitness room, and community rooms and swimming pool. Open space amenities for future residents would include three amenity decks located on levels 2, 30, and 31 of the new residential building that would feature landscaping and seating areas. Additional amenities associated with the new residential building would include a dog run area on the ground level, a gym/fitness center on level two, a community room on level 30, and a swimming pool and spa on level 31.

Pursuant to LAMC Section 12.21-G,2, one tree per four units is required to be provided on site (street trees may be included). Therefore, the Project would provide 64 trees for the proposed 256 residential dwelling units.

As the Project has been designed with a unified architectural aesthetic and would promote the pedestrian experience through a new streetscape design that would substantially increase landscape amenities, including the provision of ground level commercial uses, street trees, an outdoor plaza,

and landscaping, the Project would not conflict with applicable zoning or other regulations governing scenic quality.

Conclusion:

The Project would be consistent with applicable zoning and other regulations governing scenic quality. Project impacts would be less than significant and no mitigation measures are required.

Consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to visual character or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

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

Light and Glare

For Informational Purposes Only.

Less Than Significant Impact. The Project Site is currently occupied by school-related buildings and surface parking. The Project Site is located in a highly urbanized area with a mix of commercial, residential, office and institutional land uses, characterized by buildings of varying heights. Pole mounted streetlights along Shatto Place and 6th Street and mounted security lighting within the surface parking lot and on existing buildings provide extensive illumination within and near the Project Site. The mix of land uses in the immediate Project Site vicinity include a variety of structures ranging from low to high-rise buildings. The area is characterized by high ambient light levels from street front commercial uses, streetlights, architectural and security lighting, indoor building illumination, and vehicle lights along adjacent roadways.

Construction activities would occur between 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 6:00 p.m. on Saturdays, with no construction permitted on Sundays. Therefore, construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur during evening hours. Furthermore, construction-related illumination would be used for safety and security purposes only and per Mitigation Measure MM NOISE-1, the Applicant would provide and maintain a construction fence along the perimeter of the Project Site during construction. Based on compliance with regulatory requirements and implementation of Mitigation Measure MM NOISE-1, impacts on light and glare during construction would be less than significant. During operations, the Project's mix of uses would generate levels of interior and exterior lighting for security, parking entrances, signage and architectural highlighting, similar to other uses in the area. Soft accent lighting used for signage, and architectural highlighting would be directed to permit visibility of the highlighted elements but, would not be so bright as to cause substantial light spill off the Project Site.

Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project Site and not on adjacent residential properties in accordance with LAMC lighting regulations which require that operational lighting will be directed

downward or on the specific on-site feature to be lit or avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses. . Proposed signage and outdoor lighting would be subject to applicable regulations contained within the LAMC. Most notably, LAMC Section 93.0117(b) limits lighting intensity or direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

LAMC Section 14.4.4.E, requires that no sign shall be arranged and illuminated in a manner that would produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

Existing glare in the Project area is not substantial and is typical of a highly urbanized area, with sunlight reflected off of reflective materials utilized in buildings and from vehicle windows and other surfaces. The Project's building materials include concrete with painted concrete balcony slabs clad in a prefinished aluminum window system with double-glazed vision glass units, and opaque spandrel units. In accordance with City requirements, the exterior of the proposed structure would use materials such as, high-performance and/or low-reflective glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces that would minimize glare and reflected heat. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Based on the above, glare impacts are not expected to be substantial or to adversely affect day or night views. Therefore, glare impacts are considered less than significant.

Conclusion:

The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Project impacts would be less than significant. No mitigation measures are required.

Consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to light and glare or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Shade/Shadow

For Informational Purposes Only.

Less Than Significant Impact. The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed "shadow-sensitive." Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the

earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

"Solstice" is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun's apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 1/2° of the arc. At winter solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. Meanwhile, at the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year.

Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the Project area include residential uses to the north and east of the Project Site and outdoor play areas associated with Young Oak Kim Academy middle school to the southwest of the Project Site.

A Project impact would normally be considered significant if shadow-sensitive uses would be shaded by Project-related structures for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. between late October and early April, or for more than 4 hours between the hours of 9:00 a.m. and 5:00 p.m. between early April and late October. Shading diagrams are presented for winter and summer solstices as well as the spring and fall equinoxes in Appendix A and are presented in Figure A-1, *Winter Solstice Shadows – December 21*; Figure A-2, *Spring Equinox Shadows – March 21*; Figure A-3, *Summer Solstice Shadows – June 21*; and Figure A-4, *Fall Equinox Shadows – September 21*. Shadows for all other times of the year can be interpolated between these four seasons and would not exceed the shadow effects identified at these four points in time. Shadow lengths, based on the Project's building height, are identified for specific times of the day and vary according to the season of the year.

As shown in in Figures A-1 through A-4 in Appendix A, no shading of the Young Oak Kim Academy to the southwest would occur during any of the four seasons. During the Winter Solstice, shadows would reach a small portion of the multifamily uses to the east after 12:30 p.m. until 3:00 p.m.; less than 3 hours. Similarly, a small portion of residential uses to the north would be shaded, at 12:00 p.m., but the shadow would last for less than 3 hours. No other shading to sensitive receptors would occur during the Winter Solstice. During the Spring Equinox, Fall Equinox, and Summer Solstice, shadows would pass over the multifamily building to the east starting at 3:00 p.m. and remain until 5:00 p.m.; occurring for less than 4 hours.

Conclusion:

The proposed buildings on the Project Site would not significantly increase the shading of nearby shadow-sensitive uses based on the significance thresholds stated above, and a less than significant impact would occur. No mitigation measures are required.

Consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to shade and shadow or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Cumulative Impacts: Aesthetics

For Informational Purposes Only.

The analysis of cumulative impacts is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects. The list of related projects was provided by the City of Los Angeles Department of Transportation (LADOT) and also includes other projects in the area based recent studies. A list of 118 related projects and one related infrastructure project in the Project study area is provided in **Table 5-46**, *Summary of Related Projects*. Related Projects are mapped in Figure 5-2, *Related Projects Map*.

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses in a heavily urbanized area of the City of Los Angeles. Because of the area's dense urban fabric, public scenic views are generally available only through public street corridors and from public parks that have street corridor views or are set back from existing buildings.

Related projects in combination with the Project are located within designated urban lots planned for development and would not encroach upon public views through street corridors. Although some views of architecturally or historically important buildings could be obscured by taller buildings constructed within a line of sight over existing low rise development and parking lots, there would be limited potential for such occurrences and views of primary facades of architecturally or historically important buildings would not likely be affected. In addition, most development of a larger scale would be subject to environmental review and indirect impacts on historic resources or other scenic resources would be mitigated to the degree feasible. Accordingly, as the Project would not have direct or indirect impacts on scenic resources, its contribution to impacts on views of scenic resources from other related projects would not be cumulatively considerable and cumulative impacts would be less than significant.

Because the visual character of the area is defined by a range of diverse architecture that is generally not cohesive, and in many areas, like the Project Site, lacks a high level of visual quality, it is anticipated that new development would in general upgrade the visual quality of the area. New development subject to discretionary approval would conform to the City's design standards, and it is therefore anticipated that new development would reflect high quality design and would not degrade the visual character of the area. Accordingly, as the related projects and

the Project would not degrade the visual character of the Project area, the Project's contribution to adverse impacts on visual character would not be cumulatively considerable and cumulative impacts would be less than significant.

Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by high ambient light levels. Because lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the LAMC, compliance would ensure that impacts regarding lighting for the Project and related projects would not significantly impact sensitive uses. Accordingly, the Project's contribution to impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

None of the related projects is located within close proximity to the Project such that they would contribute to cumulative glare impacts. As the Project would not have a significant glare impact and impacts from related projects would not be proximate enough to result in combined glare effects, the Project's contribution to glare impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

The Koreatown area is a heavily developed area with an array of building volumes where varied shading conditions occur throughout the day. With regard to shading at a particular shade sensitive resource, shading is a localized phenomenon and cumulative shading impacts would only occur when development projects are in the immediate vicinity of one another. Due to the locations of the related projects, which are a considerable distance from the Project Site, there would not be overlapping shadow effects on sensitive receptors in association with the Project.

Conclusion:

The Project would not contribute to cumulative shadow effects and cumulative impacts would be less than significant and no mitigation measures are required.

Consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA. Overall, cumulative aesthetics impacts would be less than significant.

5.2 Agricultural 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 and Range Assessment project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

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

No Impact. The Project Site is located within a highly urbanized area and is currently developed with a private school and existing buildings include school related buildings and a surface parking lot. No agricultural uses, or related farmland operations, are present within the Project Site or surrounding area. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP).[4] The urban character of the Project Site would be consistent with the FMMP's definition of "Urban and Built-Up Land," which does not constitute farmland.

Conclusion:

The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impact would occur and no mitigation measures are required.

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

No Impact. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. The Project Site is not zoned for agricultural uses presently and will not be rezoned to permit agricultural uses, and is not subject to a Williamson Act contract.

[4] State of California Department of Conservation, California Important Farmland Finder, http://maps.conservation.ca.gov/ciff/ciff.html, Accessed May 2018.

Conclusion:

The Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract and, thus, no impacts would occur. No mitigation measures are required.

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

No Impact. The Project Site is currently developed with school related-buildings and paved parking and is not zoned for forestry or timberland uses. The northern parcel where the new building would be developed, is zoned CR-1. The parcel on the southern portion of the Project Site occupied by the school building is zoned C2-1. Thus, the Project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land or timberland to non-forest uses.

Conclusion:

The Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland zoning and no impact would occur and no mitigation measures would be required.

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

No Impact. The Project Site is currently developed with school related-buildings and paved parking and is not zoned for forestry or timberland uses. 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."[5] 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."[6]

Conclusion:

No forest uses are located on the Project Site or within the area. Therefore, no impacts would occur and no mitigation measures would be required.

[5] California Public Resources Code Section 1222(g).

[6] California Public Resources Code Section 4526.

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?

No Impact. The Project Site does not contain farmland, forest land, or timberland. Accordingly, the Project would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. No mitigation measures would be required.

Conclusion:

The Project Site does not contain farmland, forest land, or timberland. No impacts would occur and no mitigation measures would be required.

Cumulative Impacts: Agricultural and Forest Resources

As with the Project, the related projects are located within a developed, urbanized area of the City of Los Angeles generally zoned for commercial and residential uses and their project sites do not support existing farming, agricultural or forest-related operations. Therefore, development of the related projects together with the Project would not result in the conversion of State-designated agricultural land from an agricultural use to a non-agricultural use, or result in the loss of forest land or the conversion of forest land to non-forest use.

Conclusion:

No cumulative impacts on agriculture and forest resources would occur and no mitigation measures would be required.

5.3 Air Quality

The analysis is based on the information provided in the Project-specific air quality technical emissions modeling worksheets contained in Appendix B attached hereto, as well as the Project-specific transportation study contained in Appendix J.

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?

Less Than Significant Impact. The Project Site is located within the South Coast Air Basin (Basin). Air quality planning for the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The air quality plans applicable to the Project Site are the SCAQMD's 2016 Air Quality Management Plan (AQMP) and the 2016-2040 RTP/SCS.

2016 AQMP

In March 2017 the SCAQMD and CARB approved the 2016 AQMP. United States Environmental Protection Agency (USEPA) approval is pending, but is a necessary requirement before the 2016 AQMP can be incorporated into the State Implementation Plan. Until such time as the 2016 AQMP is approved by the USEPA, the 2012 AQMP remains the applicable AQMP for federal air quality planning purposes. However, for the purpose of CEQA, this analysis considers the 2016 AQMP, which has been fully approved in California. Key elements of the 2016 AQMP include implementing fair-share emissions reductions strategies at the federal, State, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero and near-zero-emissions technologies; and taking credit from air quality co-benefits for greenhouse gas (GHG) reduction plans, energy, transportation and other planning efforts. The strategies included in the 2016 AQMP are intended to demonstrate attainment of the NAAQS for the federal O_3 and PM2.5 standards. The Project would be not conflict with the ability of federal, State, and local agencies to implement fair-share emissions strategies. The Project would also not conflict with goals to reduce vehicle miles traveled (VMT) and associated vehicles emissions given that the Project Site is located within a designated City of Los Angeles TPA. Therefore, the Project would not conflict with the 2016 AQMP.

Growth Projections

Project construction would result in an increase in short-term or temporary employment as compared to existing conditions. Construction jobs under the Project would generally be small in number, temporary in nature, and filled by local construction workers already living and working in the region at similar short-term construction jobs, and therefore, these jobs would not conflict with the long-term employment projections upon which the AQMP are based.

Emission Control Measures

Control strategies in the AQMP, applicable to control temporary emissions from construction activities, include ONRD-04 and OFFRD-01 (as denoted in the 2012 AQMP) and MOB-08 and MOB-10 (as denoted in the 2016 AQMP),[7] which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating the replacement of older, emissions-prone engines with newer engines that meet more stringent emission standards. In accordance with such strategies, the Project would use construction contractors that are required by State regulation to be in compliance with the California Air Resources Board (CARB) Air Toxics Control Measure (ATCM) that limit diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation that aims to reduce emissions through the installation of diesel particulate matter filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Under the In-Use Off-Road Diesel Vehicle Regulation, construction equipment fleet operators are required to replace higher emitting models with lower emitting models based on a phased-in schedule with full compliance by 2023 for large and medium fleets

[7] AQMP measures ONRD-04 (2012 AQMP) and MOB-08 (2016 AQMP) apply to on-road mobile sources and are the accelerated retirement of older on-road heavy-duty vehicles to reduce emissions of NO_X and particulate matter. AQMP measures OFFRD-01 (2012 AQMP) and MOB-10 (2016 AQMP) apply to off-road mobile sources and are the extension of the Surplus Off-Road Opt-In for NO_X (SOON) provision for construction/industrial equipment to encourage the accelerated retirement of older off-road heavy-duty equipment to reduce emissions of NO_X.

(fleets with greater than 5,000 total equipment horsepower or with 2,501 to 5,000 horsepower, respectively) and by 2028 for small fleets (fleets with 2,500 or less total equipment horsepower). The Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403 (Fugitive Dust). Compliance with these requirements meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

As discussed in greater detail in Items 5.1, *Aesthetics*, and 5.17, *Transportation*, the Project Site is located within a designated City of Los Angeles TPA. The Project Site's location, and the Project's design and land uses, also ensure the Project would not conflict with the AQMP. The AQMP includes Transportation Control Measures that are intended to reduce regional mobile source emissions. While the majority of the measures are implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, the Project Site's urban infill location and the Project's mixed-use design and land uses, which increase the density at a site located within a TPA, would support measures related to reducing vehicle trips for residents, patrons, and employees by increasing residential and commercial density near public transit. The Project would also provide 158 bicycle parking spaces which would encourage non-fossil fuel dependent commuting.

The Project Site is served by a network of regional transportation facilities providing connectivity to the larger metropolitan area. The Project Site is located less than 500 feet northwest of the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line. The Purple Line Extension is under development and would ultimately extend westward for approximately 9 miles, providing additional stations at the Miracle Mile area, the City of Beverly Hills, Century City, and Westwood. The first section of the Purple Line Extension between the new Wilshire/Western station and new Wilshire/La Cienega station is currently under construction and is scheduled for completion in 2023.[8] The Project Site is also in close proximity to several bus lines. The Project would be not conflict with the ability of federal, State, and local agencies to implement fair-share emissions strategies. The Project would also not conflict with goals to reduce vehicle miles traveled (VMT) and associated vehicles emissions given that the Project Site is located within a City of Los Angeles TPA.

2016–2040 RTP/SCS

The primary objectives of the RTP/SCS that are aimed at reducing air pollution consist of adding density in proximity to transit stations, and encouraging mixed-use development and active transportation. As such, the Project is consistent with the growth and sustainability policies of SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which seeks to improve mobility and access by placing destinations closer together connected by public transportation.

Because the Project is located within a City of Los Angeles TPA and provides for needed housing and affordable housing, the population growth generated by the Project would not conflict with the City's and SCAG's growth policies. The Project's estimated residential population would be approximately 622 residents (based on a net 256 dwelling units and an average 2.43 persons per

[8] https://www.metro.net/projects/westside/. Accessed September 20, 2018.

housing unit for the City). The Project would replace existing school uses with new office and commercial uses, resulting in a total net employee population of approximately 20 persons. Refer to Item 5.14, *Population and Housing*, for additional details.

As shown in Item 5.14, *Population and Housing*, the Project's estimated 622 residents would comprise less than 1.0 percent of SCAG's estimated population growth by 2021. SCAG's longer-term projected population increase for the City area, in 2040, is an estimated additional 635,275 residents for a total residential population of 4,609,400; therefore, the Project would comprise approximately 0.1 percent of SCAG's total population increase for the City between 2018 and 2040.

The Project's proposed 256 housing units would comprise 0.6 percent of SCAG's year 2021 estimated increase of 40,808 households within the City. The Project would comprise 0.1 percent of SCAG's 2040 estimated increase of households within the City. The Project would induce population growth directly through the introduction of new housing units on the Project Site which currently has no residential uses. This growth would contribute towards the attainment of City and regional goals and policies to encourage housing development in Los Angeles. The Los Angeles area is experiencing a severe market-rate and affordable housing shortage and the Mayor has called for 100,000 new housing units by 2021.[9] The Project would make progress towards the City's goal and would provide market-rate and affordable housing units to help ameliorate the housing shortage in the City (29 of the Project's residential units would be designated as affordable housing for Extremely Low Income households).

SCAG's RTP/SCS establishes general goals for land use planning and seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them."[10] According to SCAG, giving people more transportation choices and providing greater opportunities for biking and walking reduces the number of people who drive alone and encourages people to use alternative modes of travel.[11] The 2016 RTP/SCS seeks to implement "strategies focused on compact infill development, superior placemaking (the process of creating public spaces that are appealing), and expanded housing and transportation choices."[12]

In addition, the Project would not conflict with the applicable air quality plan Thus, construction and operation of the Project would have no significant impacts.

City's General Plan Air Quality Element

In addition to the Project's consistency with the 2016 AQMP, the Project would be consistent with the applicable policies of the City's General Plan Air Quality Element. The City of Los Angeles Air Quality Element of the General Plan includes Citywide policies regarding a range of

[9] City of Los Angeles, Mayor's Office, "Garcetti says housing shortage, minimum wage linked in Los Angeles," October 30, 2014. https://www.lamayor.org/garcetti-says-housing-shortage-minimum-wage-linked-los-angeles. Accessed September 2018.

[10] Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, (2016), page 16. Available at: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf. Accessed September 2018.

[11] Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, (2016), page 14.

[12] Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, (2016), page 14.

City resources and services, some of which are relevant to air quality. **Table 5-2**, *Comparison of the Project to Applicable Goals and Policies of the Air Quality Element of the City of Los Angeles General Plan*, evaluates the consistency of the Project with the applicable air quality goals, objectives, and policies in the Air Quality Element of the General Plan. As discussed below, the Project construction and operations would not conflict with or be inconsistent with applicable air quality policies of the General Plan.

TABLE 5-2
COMPARISON OF THE PROJECT TO APPLICABLE GOALS AND POLICIES OF THE AIR QUALITY ELEMENT OF THE CITY OF LOS ANGELES GENERAL PLAN

Recommendation	Analysis of Project Consistency
Air Quality Element	
Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.	**Consistent.** The Project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement "smart growth." The Project would provide residential uses and employment opportunities in close proximity to job centers in Los Angeles where people can live and work and have access to convenient modes of transportation that provides options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The Project would meet the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The Project would also reduce VMT as a result of its urban infill location, in a dense mixed-use area. The Project Site is less than 500 feet northwest from the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line. The Project Site is in close proximity to several bus lines including Metro Lines and the Wilshire Center/Koreatown DASH line. The Project would add new infill residential units, with convenient access to public transit, which would allow people to live near work and recreational amenities. As a result, the Project would provide people with convenient mobility options and a wide range of economic/employment opportunities.
Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan, increase traffic mobility, and sustain economic growth citywide.	**Consistent.** The Project's land use characteristics and PDFs would reduce emissions associated with energy and transportation. The Project would be consistent with the SCAG growth projections that are used in preparing the AQMP. The Project would occupy a location that is highly accessible by regional and local bus lines and Metro rail. As such, the Project would be supportive of the Transportation Control Measures in the AQMP related to reducing vehicle trips for employees, visitors and residents. The Project would provide infill residential uses, which would allow people to live near work and recreational amenities.
Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	**Consistent.** The Project would incorporate measures that would reduce particulate air pollutants from unpaved areas, parking lots, and construction sites. The Project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403. The Project would also comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks reducing exhaust DPM emissions. Project construction would comply with the applicable provisions of the CARB In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of DPM filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Project construction would also comply with the applicable provisions of the CARB Truck and Bus regulation to reduce particulate matter and nitrogen oxide emissions from existing diesel trucks.

Recommendation	Analysis of Project Consistency
Policy 1.3.1: Minimize particulate emissions from construction sites.	**Consistent.** The Project would incorporate measures that would reduce particulate air pollutants from construction activity as described above under Objective 1.3.
Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent.** The Project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403, which would minimize particulate emissions from unpaved roads and parking lots associated with construction-related vehicular traffic.
Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.	**Consistent.** The Project's land use characteristics would reduce trips and VMT due to its urban infill location in a dense mixed-use area that includes nearby housing, employment, commercial and service uses with nearby access to multiple nearby public transportation routes.
Objective 2.1: It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	**Consistent.** The Project is located within close proximity of existing public transportation, including existing regional and local Metro bus lines and Metro rail. The Project would locate infill residential, office, and restaurant land uses in an area with access to multiple other destinations, including job centers, and commercial uses. These features would reduce trips and encourage residents to utilize alternative modes of transportation.
Policy 2.1.1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The Project would be located within close proximity of multiple transportation routes, would provide access and pedestrian links to on-site uses from existing pedestrian pathways, and provide 158 bicycle parking spaces in accordance with LAMC requirements. These features would reduce work trips and encourage employees to utilize alternative modes of transportation including public transportation, walking, and bicycling.
Objective 2.2: It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.	**Consistent.** The Applicant would install pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs. In addition, the Project's location would encourage non-automotive transportation to and from the Project Site. The Project would be located within close proximity to existing public transportation and would provide on-site bicycle parking for building residents, employees, and visitors.
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.	**Consistent.** The Project's location would encourage non-automotive transportation to and from the Project Site. The Project would be located within close proximity of public transportation, including existing regional and local Metro bus lines and Metro rail. The Project would provide 158 bicycle parking spaces for residents, employees, and visitors.
Policy 2.2.2: Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent.** The Project would include bicycle parking in accordance with LAMC Section 12.21.A.16.
Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	**Consistent.** The Project's characteristics would reduce trips and VMT due to its infill location, ready access to public transportation, close proximity to multiple other destinations including job centers commercial uses, and services, and is pedestrian and bicycle-friendly.
Objective 4.1: It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.	**Consistent.** The Project analysis of potential air quality impacts relied upon the numeric indicators of significance adopted by the SCAQMD, which considers attainment of the ambient air quality standards. The Project also incorporates land use characteristics that would reduce air pollutant emissions. The Project operational impacts would be less than significant and would not cause or contribute to an exceedance of the ambient air quality standards.

Recommendation	Analysis of Project Consistency
Policy 4.1.2: Ensure that project level review and approval of land use development remain at the local level.	**Consistent.** The Project environmental review and approval would occur at the local level.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The Project would provide a new mixed-use development that would include residential, office and restaurant land uses in an infill location within close proximity to public transportation. The Project is located an urban area surrounded by commercial, residential, restaurant, office, and service uses.
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project is proposed on an infill location and would incorporate pedestrian pathways that would connect to the existing sidewalk network. The Applicant would include pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs. The Project would provide 158 bicycle parking spaces in compliance with LAMC requirements. The Project would improve pedestrian circulation and the pedestrian environment with the inclusion of a ground level restaurant and outdoor patio, ground level office uses, inclusion of a public plaza and open space, perimeter landscaping. Therefore, the Project would provide services for and would be compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.
Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The Project environmental review and potential approval include an analysis of air quality impacts.
Policy 4.2.5: Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent.** The Project is proposed on an infill site that would be located within a quarter-mile of existing public transportation, including existing regional and local Metro bus lines and Metro rail. The Project would provide 158 bicycle parking spaces in compliance with LAMC requirements.
Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures, including passive methods such as site orientation and tree planting.	**Consistent.** The Project would be designed and operated to meet the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The Project would incorporate sustainability measures and performance standards including implementing a construction waste management plan to divert all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Council File 09-3029. The Project would include a total of 64 new trees including three new street trees along West 6th Street and five new street trees along Shatto Place.
Objective 5.1: It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.	**Consistent.** As noted above, the Project would be designed and operated to meet the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code.
Policy 5.1.2: Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Consistent.** As noted above, the Project would be designed and operated to meet the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The Applicant proposes pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs.

Recommendation	Analysis of Project Consistency
Policy 5.1.4: Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Consistent.** The Project would implement a construction waste management plan to divert all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Council File 09-3029. Municipal solid waste would be collected by haulers that comply with City and State waste diversion (specifically Assembly Bill [AB] 1327) requirements, which may include mixed waste processing that yields diversion results comparable to source separation.
Objective 5.3: It is the objective of the City of Los Angeles to reduce the use of polluting fuels in stationary sources.	**Consistent.** As noted above, the Project would be designed and operated to meet the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code.
Policy 5.3.1: Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent.** As noted above, the Project would be designed and operated to meet the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The Applicant would include pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs.

SOURCE: ESA, 2018.

Conclusion:

The Project would not conflict with or obstruct the implementation of the air quality goals, objectives, and policies of the General Plan. Implementation of the Project would result in a less-than-significant impact. No mitigation measures would be required.

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

Less Than Significant Impact. A significant impact may occur if a project were to make a cumulatively considerable contribution of a federal or State criteria pollutant for which the Basin is currently in non-attainment. The Basin is currently in non-attainment for ozone (federal and State standards), respirable particulate matter (PM10) (State standards only) and fine particulate matter (PM2.5) (federal and state standards).

SCAQMD has not established quantitative thresholds for cumulatively considerable contributions to regional emissions for criteria pollutants. SCAQMD Air Quality Handbook advises that for both construction and operational activities, if a project exceeds the identified project-level significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. As discussed below, maximum daily net emissions of construction and operation-related pollutants would not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the Project would not result in an addition of criteria pollutants such that cumulative impacts would occur, in conjunction with related projects in the region.

In addition, as discussed under Issue c., below, construction of the Project is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD has established a localized impact threshold. Therefore, the emissions of non-attainment pollutants and precursors generated by the Project in excess of the SCAQMD project-level thresholds would be less than significant and would not result in a cumulatively considerable air quality impact.

In particular, State CEQA Guidelines sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

> *"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency."*

For purposes of the cumulative air quality analysis, with respect to State CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the applicable AQMP. As discussed previously under Issue a., the Project would not conflict with the AQMP and would not have a cumulatively considerable air quality impact.

The Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and Project occupancy (long-term). However, based on the following analysis, construction and operation of the Project would result in less-than-significant impacts relative to the maximum daily emissions as compared to the SCAQMD regional significance thresholds for construction and operational phases for criteria air pollutant emissions in which the region is non-attainment under the CAAQS or NAAQS (i.e., ozone precursors of volatile organic compounds [VOCs] and nitrogen oxides [NOx], PM10, and PM2.5). In addition, construction and operational emissions from the Project would not exceed the SCAQMD regional significance thresholds for attainment or maintenance criteria air pollutants (i.e., carbon monoxide [CO] and sulfur dioxide [SO_2]).

Criteria Pollutants

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the USEPA and are subject to emissions control requirements adopted by federal, state and local regulatory agencies. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria,

which have been adopted at levels considered safe to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. Exposure to these criteria air pollutants at levels above applicable standards can lead to health effects, as summarized below.

Ozone (O_3): Ozone is a secondary pollutant formed by the chemical reaction of VOCs and NO_X in the presence of sunlight under favorable meteorological conditions, such as high temperature and stagnation episodes. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. According to the USEPA, ozone can cause the muscles in the airways to constrict potentially leading to wheezing and shortness of breath.[13] Ozone can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases such as asthma, emphysema and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease.[14] Long-term exposure to ozone is linked to aggravation of asthma, and is likely to be one of many causes of asthma development and long-term exposures to higher concentrations of ozone may also be linked to permanent lung damage, such as abnormal lung development in children.[15] According to the CARB, inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms and exposure to ozone can reduce the volume of air that the lungs breathe in and cause shortness of breath.[16] The USEPA states that people most at risk from breathing air containing ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers.[17] Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure.[18] According to CARB, studies show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to ozone and other pollutants because they spend nearly twice as much time outdoors and engaged in vigorous activities compared to adults.[19] Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own symptoms and avoid harmful exposures.[20] Further research may be able to better distinguish between health effects in children and adults.[21]

[13] United States Environmental Protection Agency, Health Effects of Ozone Pollution, https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, last updated October 10, 2018. Accessed January 2019.

[14] United States Environmental Protection Agency, Health Effects of Ozone Pollution.

[15] United States Environmental Protection Agency, Health Effects of Ozone Pollution.

[16] California Air Resources Board, Ozone & Health, Health Effects of Ozone, https://ww2.arb.ca.gov/resources/ozone-and-health. Accessed January 2019.

[17] United States Environmental Protection Agency, Health Effects of Ozone Pollution.

[18] United States Environmental Protection Agency, Health Effects of Ozone Pollution.

[19] California Air Resources Board, Ozone & Health, Health Effects of Ozone.

[20] California Air Resources Board, Ozone & Health, Health Effects of Ozone.

[21] California Air Resources Board, Ozone & Health, Health Effects of Ozone.

Volatile Organic Compounds (VOCs): VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, they contribute with NO_X to form ozone, and are regulated to prevent the formation of ozone.[22] According to CARB, some VOCs are highly reactive and play a critical role in the formation of ozone, other VOCs have adverse health effects, and in some cases, VOCs can be both highly reactive and have adverse health effects.[23] VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings, etc.).[24]

Nitrogen Dioxide (NO_2) and Nitrogen Oxides: NO_X is a term that refers to a group of compounds containing nitrogen and oxygen. The primary compounds of air quality concern include nitrogen dioxide (NO_2) and nitric oxide (NO). Ambient air quality standards have been promulgated for NO_2, which is a reddish-brown, reactive gas.[25] The principal form of NO_X produced by combustion is NO, but NO reacts quickly in the atmosphere to form NO_2, creating the mixture of NO and NO_2 referred to as NO_X.[26] Major sources of NO_X include emissions from cars, trucks and buses, power plants, and off-road equipment.[27] The terms NO_X and NO_2 are sometimes used interchangeably. However, the term NO_X is typically used when discussing emissions, usually from combustion-related activities, and the term NO_2 is typically used when discussing ambient air quality standards. Where NO_X emissions are discussed in the context of the thresholds of significance or impact analyses, the discussions are based on the conservative assumption that all NO_X emissions would oxidize in the atmosphere to form NO_2. According to the USEPA, short-term exposures to NO_2 can potentially aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms while longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections.[28] According to CARB, controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics.[29] In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.[30] Infants and children are particularly at risk from exposure to NO_2 because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration while in adults, the greatest

22 United States Environmental Protection Agency, Technical Overview of Volatile Organic Compounds, https://www.epa.gov/indoor-air-quality-iaq/technical-overview-volatile-organic-compounds, last updated April 12, 2017. Accessed January 2019.

23 California Air Resources Board, Toxic Air Contaminants Monitoring, Volatile Organic Compounds, https://www.arb.ca.gov/aaqm/toxics.htm, last reviewed June 9, 2016. Accessed January 2018.

24 California Air Resources Board, Toxic Air Contaminants Monitoring, Volatile Organic Compounds.

25 California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health. Accessed January 2019.

26 California Air Resources Board, Nitrogen Dioxide & Health.

27 United States Environmental Protection Agency, Nitrogen Dioxide (NO_2) Pollution, https://www.epa.gov/no2-pollution/basic-information-about-no2, last updated September 8, 2016. Accessed January 2019.

28 United States Environmental Protection Agency, Nitrogen Dioxide (NO_2) Pollution.

29 California Air Resources Board, Nitrogen Dioxide & Health.

30 California Air Resources Board, Nitrogen Dioxide & Health.

risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease.[31] CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO_2 and there is only limited information for NO and NO_X, as well as large uncertainty in relating health effects to NO or NO_X exposure.[32]

Carbon Monoxide (CO): CO is primarily emitted from combustion processes and motor vehicles due to the incomplete combustion of fuel, such as natural gas, gasoline, or wood, with the majority of outdoor CO emissions from mobile sources.[33] According to the USEPA, breathing air with a high concentration of CO reduces the amount of oxygen that can be transported in the blood stream to critical organs like the heart and brain and at very high levels, which are possible indoors or in other enclosed environments, CO can cause dizziness, confusion, unconsciousness and death.[34] Very high levels of CO are not likely to occur outdoors; however, when CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease since these people already have a reduced ability for getting oxygenated blood to their hearts and are especially vulnerable to the effects of CO when exercising or under increased stress.[35] In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain also known as angina.[36] According to CARB, the most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain.[37] For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress; inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance.[38] Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO.[39]

Sulfur Dioxide (SO_2): According to the USEPA, the largest source of SO_2 emissions in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities while smaller sources of SO_2 emissions include industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content.[40] In 2006, California phased-in the ultra-low-sulfur diesel regulation limiting vehicle diesel fuel to a sulfur content not exceeding 15 parts per million, down from the previous requirement of 500 parts per million, substantially reducing

31 California Air Resources Board, Nitrogen Dioxide & Health.

32 California Air Resources Board, Nitrogen Dioxide & Health.

33 California Air Resources Board, Carbon Monoxide & Health, https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health. Accessed January 2019.

34 United States Environmental Protection Agency, Carbon Monoxide (CO) Pollution in Outdoor Air, https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution, last updated September 8, 2016. Accessed January 2019.

35 United States Environmental Protection Agency, Carbon Monoxide (CO) Pollution in Outdoor Air.

36 United States Environmental Protection Agency, Carbon Monoxide (CO) Pollution in Outdoor Air.

37 California Air Resources Board, Carbon Monoxide & Health.

38 California Air Resources Board, Carbon Monoxide & Health.

39 California Air Resources Board, Carbon Monoxide & Health.

40 United States Environmental Protection Agency, Sulfur Dioxide (SO_2) Pollution, https://www.epa.gov/so2-pollution/sulfur-dioxide-basics, last updated June 28, 2018. Accessed January 2019.

emissions of sulfur from diesel combustion.[41] According to the USEPA, short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult.[42] According to CARB, health effects at levels near the State one-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath and chest tightness, especially during exercise or physical activity and exposure at elevated levels of SO_2 (above 1 part per million (ppm)) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality.[43] Children, the elderly, and those with asthma, cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO_2.[44,45]

Particulate Matter (PM10 and PM2.5): Particulate matter air pollution is a mixture of solid particles and liquid droplets found in the air.[46] Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye while other particles are so small they can only be detected using an electron microscope.[47] Particles are defined by their diameter for air quality regulatory purposes: inhalable particles with diameters that are generally 10 micrometers and smaller (PM10); and fine inhalable particles with diameters that are generally 2.5 micrometers and smaller (PM2.5).[48] Thus, PM2.5 comprises a portion or a subset of PM10. Sources of PM10 emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands.[49] Sources of PM2.5 emissions include combustion of gasoline, oil, diesel fuel, or wood.[50] PM10 and PM2.5 may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO_2, NO_X, and certain organic compounds.[51] According to CARB, both PM10 and PM2.5 can be inhaled, with some depositing throughout the airways; PM10 is more likely to deposit on the surfaces of the larger airways of the upper region of the lung while PM2.5 is more likely to travel into and deposit on the surface of the deeper parts of the lung, which can induce tissue damage, and lung inflammation.[52] Short-term (up to 24 hours duration) exposure to PM10 has been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive

41 California Air Resources Board, Final Regulation Order, Amendments to the California Diesel Fuel Regulations, Amend Section 2281, Title 13, California Code of Regulations, https://www.arb.ca.gov/regact/ulsd2003/fro2.pdf, approved July 15, 2004. Accessed January 2019.

42 United States Environmental Protection Agency, Sulfur Dioxide (SO_2) Pollution.

43 California Air Resources Board, Sulfur Dioxide & Health, https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health. Accessed January 2019.

44 California Air Resources Board, Sulfur Dioxide & Health.

45 United States Environmental Protection Agency, Sulfur Dioxide (SO_2) Pollution.

46 United States Environmental Protection Agency, Particulate Matter (PM) Pollution, https://www.epa.gov/pm-pollution/particulate-matter-pm-basics, last updated November 14, 2018. Accessed January 2019.

47 United States Environmental Protection Agency, Particulate Matter (PM) Pollution.

48 United States Environmental Protection Agency, Particulate Matter (PM) Pollution.

49 California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, last reviewed August 10, 2017. Accessed January 2019.

50 California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

51 California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

52 California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

pulmonary disease, leading to hospitalization and emergency department visits.[53] The effects of long-term (months or years) exposure to PM10 are less clear, although studies suggest a link between long-term PM10 exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer.[54] Short-term exposure to PM2.5 has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days and long-term exposure to PM2.5 has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children.[55] According to CARB, populations most likely to experience adverse health effects with exposure to PM10 and PM2.5 include older adults with chronic heart or lung disease, children, and asthmatics and children and infants are more susceptible to harm from inhaling pollutants such as PM10 and PM2.5 compared to healthy adults because they inhale more air per pound of body weight than do adults, spend more time outdoors, and have developing immune systems.[56]

Lead (Pb): Major sources of lead emissions include ore and metals processing, piston-engine aircraft operating on leaded aviation fuel, waste incinerators, utilities, and lead-acid battery manufacturers.[57] In the past, leaded gasoline was a major source of lead emissions; however, the removal of lead from gasoline has resulted in a decrease of lead in the air by 98 percent between 1980 and 2014.[58] Lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system, and affects the oxygen carrying capacity of blood.[59] The lead effects most commonly encountered in current populations are neurological effects in children, such as behavioral problems and reduced intelligence, anemia, and liver or kidney damage.[60] Excessive lead exposure in adults can cause reproductive problems in men and women, high blood pressure, kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain.[61] Project construction and operation would not include sources of lead emissions and would not exceed the established thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial and residential land use projects such as the Project. As a result, lead emissions are not further evaluated.

Project Design Features (PDF)

The Project would implement the following PDF to minimize construction-related emissions:

53 California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

54 California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

55 California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

56 California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

57 United States Environmental Protection Agency, Lead Air Pollution, https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution, last updated November 29, 2017. Accessed January 2019.

58 United States Environmental Protection Agency, Lead Air Pollution.

59 United States Environmental Protection Agency, Lead Air Pollution.

60 California Air Resources Board, Lead & Health, https://ww2.arb.ca.gov/resources/lead-and-health. Accessed January 2019.

61 California Air Resources Board, Lead & Health.

PDF AIR-1: Construction equipment operating at the Project Site shall be subject to a number of requirements. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction measures would include, but are not limited to the following:

- Prior to the issuance of a grading or building permit for each phase, an inventory of off-road heavy-duty construction equipment for that phase of construction, equal to or greater than 50 horsepower that will be used an aggregate of 40 or more hours, shall be provided to the Department of Building and Safety and the Department of City Planning. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification or model year specification and California Air Resources Board or South Coast Air Quality Management District operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.
- Off-road diesel-powered equipment within the construction inventory shall meet the Tier 4 final off-road emissions standards within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board certified Level 3 Diesel Particulate Filter or equivalent;
- All cranes and welders shall be electric-powered;
- Forklifts shall be natural gas-powered;
- The Project shall utilize low-VOC coatings where commercially available during construction activities to avoid excessive VOC emissions; and
- Trucks and other vehicles in loading and unloading queues shall be parked with engines off to reduce vehicle emissions during construction activities.

Construction Impacts

The greatest potential for exposure to substantial pollutant concentrations and TAC emissions during construction would be diesel particulate matter emissions associated with heavy-development equipment operations and truck traffic during construction activities. In addition, fugitive dust emissions may result from other construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials may release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on the most recently adopted thresholds set forth in the SCAQMD's CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following threshold levels: (1) 75 pounds per day for VOCs, (2) 100 pounds per day for nitrogen oxides (NO_X), (3) 550 pounds per day for carbon monoxide (CO), (4) 150 pounds per day for

sulfur oxides (SO_X), (5) 150 pounds per day for respirable particulate matter (PM10), and (6) 55 pounds per day for fine particulate matter (PM2.5).[62]

The Project would involve demolition of some of the existing uses (i.e., surface parking lot and some of the existing school related buildings). The existing former church building currently on the Project Site would remain and be repurposed into a restaurant that would feature a new outdoor patio. The Project would include the construction of a new 31-story (plus a mechanical penthouse and appurtenant rooftop equipment) mixed-use building with 256 residential units and 2,507 sf of ground floor office uses. Construction activities would include demolition, excavation, grading, building construction, architectural coatings, paving, and renovation of the former building. Heavy-duty off-road equipment, such as excavators, loaders, cranes, and paving equipment would be used during construction. Approximately 4 haul truck trips would occur per day during demolition.[63] Site grading and excavation would result in approximately 56,000 cubic yards of soil export with approximately 64 haul trucks per day (which generates 32 incoming and 32 outgoing haul truck trips per day) during excavation.[64]

Construction is anticipated to begin in the second quarter of 2019. The expected duration of construction is approximately 26 months.[65] The Project is anticipated to be fully operational in 2021. Construction may commence at a later date or construction could occur over a longer period of time than that analyzed in this air quality impact analysis. If either or both of these occur, construction impacts would be less than those analyzed, because a more energy-efficient and cleaner burning construction equipment fleet mix would be expected in the future, pursuant to State regulations that require construction equipment fleet operators to phase-in less polluting heavy-duty equipment. Furthermore, construction impacts would be spread out for a longer period of time, which is likely to reduce peak daily emissions. As a result, should Project construction commence on a later date, or occur over a longer period of time than that analyzed in this air quality impact analysis, air quality impacts would be less than the impacts disclosed herein.

During construction, a variety of heavy-duty diesel powered equipment would be used on-site. Building construction and finishing activities would require equipment such as excavators, cranes, and air compressors. Construction-related emissions associated with construction equipment were calculated using the SCAQMD-recommended California Emissions Estimator Model (CalEEMod), which 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 greenhouse gas (GHG) emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been

62 South Coast Air Quality Management District, Air Quality Significance Thresholds, (March 2015), http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2. Accessed September 2018.

63 Demolition debris and required haul trucks estimated based on square feet of buildings to be removed and hardscape area. Renovation debris estimated based on square feet of building to be renovated, and divided by two for interior debris (exclude exterior wall debris).

64 Excavation amount provided by Brandow and Johnston, Structural and Civil Engineers.

65 Construction schedule based on assumptions in the California Emissions Estimator Model (CalEEMod) and supplemented with input from Brandow & Johnston Structural & Civil Engineers, and the Project Applicant.

provided by the various California air districts to account for local requirements and conditions. 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.[66]

Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest potential date) and applying the mobile source emissions factors. The emissions estimated from the CalEEMod (Version 2016.3.2) software is based on outputs from the CARB off-road equipment emissions (OFFROAD) and on-road vehicle emission factor (EMFAC) models, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles and equipment. The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. Model results are provided in Appendix B of this SCEA.

This emissions analysis for all construction activities includes compliance with mandatory SCAQMD Rule 403 measures regarding the control of fugitive dust and use of low VOC coatings consistent with AQMD Rule 1168. For modeling purposes within CalEEMod, compliance with Rule 403 is accounted for by incorporating watering three times daily, which the SCAQMD estimates a 61 percent control efficiency for fugitive dust PM10 and PM2.5 emissions. **Table 5-3**, *Maximum Net Regional Construction Emissions Without PDF AIR-1*, and **Table 5-4**, *Maximum Net Regional Construction Emissions With PDF AIR-1*, present the Project's net regional construction emissions with and without PDF AIR-1, along with the regional significance thresholds for each air pollutant.

As shown in Table 5-3 and Table 5-4, the Project's maximum net regional construction emissions would not exceed the thresholds for non-attainment pollutants of ozone precursors (i.e., VOC and NO_X), PM10, and PM2.5. In addition, construction emissions from the Project would not exceed the SCAQMD regional significance thresholds for attainment or maintenance criteria air pollutants (i.e., CO and SO_2).

Conclusion:

The Project's regional construction impacts would be less than significant, and mitigation measures are not required.

[66] See http://www.aqmd.gov/caleemod/. Accessed November 2018.

TABLE 5-3
MAXIMUM NET REGIONAL CONSTRUCTION EMISSIONS WITHOUT PDF AIR-1 (POUNDS PER DAY)

Source	VOC	NOx	CO	SO_2	PM10[a]	PM2.5[a]
Demolition – 2019	2	25	16	<1	2	1
Grading/Excavation – 2019	3	48	24	<1	5	3
Grading/Excavation – 2020	3	44	23	<1	25	8
Utilities/Trenching – 2020	1	13	10	<1	2	1
Foundations – 2020	3	34	25	<1	3	2
Building Construction – 2020	3	25	24	<1	3	2
Building Construction – 2021	3	24	23	<1	3	1
Renovation of Existing Use – 2021	1	15	12	<1	1	1
Architectural Coating/Finishing – 2021	12	10	6	<1	1	<1
Paving – 2021	1	7	8	<1	1	<1
Overlapping Phases						
2020						
Utilities/Trenching + Foundations	4	47	35	<1	5	2
2021						
Building Construction + Renovation of Existing Use	4	39	35	<1	5	2
Building Construction + Paving + Architectural Coating/Finishing + Renovation of Existing Use	16	48	40	<1	6	2
Building Construction + Renovation of Existing Use + Architectural Coatings + Paving	17	55	48	<1	6	3
Daily Maximum Emissions	**17**	**55**	**48**	**<1**	**25**	**8**
Existing Site Emissions						
Area (Consumer Products, Landscaping)	<1	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Motor Vehicles	1	4	12	<1	3	1
Existing Site Total	**1**	**4**	**12**	**<1**	**3**	**1**
Maximum Net Regional Emissions	**16**	**51**	**36**	**<1**	**22**	**7**
SCAQMD Regional Threshold	75	100	550	150	150	55
Over/Under	**(59)**	**(49)**	**(514)**	**(150)**	**(128)**	**(48)**
Exceeds Threshold?	No	No	No	No	No	No

NOTES:
Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2018.

TABLE 5-4
MAXIMUM NET REGIONAL CONSTRUCTION EMISSIONS WITH PDF AIR-1 (POUNDS PER DAY)

Source	VOC	NOx	CO	SO_2	PM10[a]	PM2.5[a]
Demolition – 2019	<1	3	16	<1	<1	<1
Grading/Excavation – 2019	1	23	27	<1	4	2
Grading/Excavation – 2020	1	21	27	<1	24	7
Utilities/Trenching – 2020	1	10	10	<1	1	<1
Foundations – 2020	1	16	32	<1	2	1
Building Construction – 2020	1	10	25	<1	3	1
Building Construction – 2021	1	9	25	<1	3	1
Renovation of Existing Use – 2021	1	11	21	<1	1	<1
Architectural Coating/Finishing – 2021	12	8	6	<1	1	<1
Paving – 2021	<1	1	9	<1	<1	<1
Overlapping Phases						
2020						
Utilities/Trenching + Foundations	2	26	42	<1	3	1
2021						
Building Construction + Renovation of Existing Use	2	20	45	<1	4	1
Building Construction + Paving + Architectural Coating/Finishing + Renovation of Existing Use	13	28	51	<1	4	1
Building Construction + Renovation of Existing Use + Architectural Coatings + Paving	14	29	60	<1	5	1
Daily Maximum Emissions	**14**	**29**	**60**	**<1**	**24**	**7**
Existing Site Emissions						
Area (Consumer Products, Landscaping)	<1	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Motor Vehicles	1	4	12	<1	3	1
Existing Site Total	**1**	**4**	**12**	**<1**	**3**	**1**
Maximum Net Regional Emissions	**13**	**25**	**48**	**<1**	**21**	**6**
SCAQMD Regional Threshold	75	100	550	150	150	55
Over/Under	**(62)**	**(75)**	**(502)**	**(150)**	**(129)**	**(49)**
Exceeds Threshold?	No	No	No	No	No	No

NOTES:
Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2018.

Operational Impacts

The SCAQMD has separate significance thresholds to evaluate a project's potential criteria air pollutant impacts associated with long-term project operations. Based on the most recently adopted thresholds set forth in the SCAQMD's CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to operational emissions if regional emissions from both direct and indirect sources would exceed any of the following threshold levels: (1) 55 pounds a day for VOCs, (2) 55 pounds per day for NO_X, (3) 550 pounds per day for CO, (4) 150 pounds per day for SO_X, (5) 150 pounds per day for PM10, and (6) 55 pounds per day PM2.5.[67]

The operation of the Project has the potential to generate net additional criteria pollutant emissions through the additional vehicle trips traveling to and from the Project Site it would generate over the existing condition. In addition, emissions would result from the energy demands of its on-site uses, including from natural gas combustion, and area sources such as landscaping equipment and the use of consumer products. The Project would also produce criteria pollutant emissions from its on-site diesel-fueled emergency generator.

Operational emissions of the Project were estimated using CalEEMod. The estimated emissions generated by the existing land uses on the Project Site (existing emissions) were subtracted from the estimated emissions generated by the land uses proposed by the Project (project emissions) to determine the Project's net emissions. Mobile source emissions were estimated based on the vehicle emission factors from EMFAC and the trip length values for the existing and Project land uses in CalEEMod, which are Basin-wide average trip distance values. The trip distances were applied to the maximum daily trip estimates, based on the trip generation rates for each land use provided by the Project Transportation Impact Analysis[68] to estimate the total VMT. The VMT estimates take into account trip and VMT reductions from Project land use characteristics, including, inter alia, internal capture from co-locating land uses on the Project Site, nearby transit options, and nearby off-site recreational, residential, commercial, restaurant, and office land uses.

With regard to area source emissions, the consumption of natural gas to provide heating and hot water generates emissions. Future fuel consumption rates were estimated based on specific square footage of the existing and Project land uses. The energy use from residential land uses was calculated within CalEEMod based on the California Energy Commission (CEC) Residential Appliance Saturation Survey (RASS), which incorporates correction factors to account for compliance with the 2016 Title 24 Building Standards Code. The energy use from commercial uses was calculated within CalEEMod based on the CEC California Commercial End Use Survey (CEUS) data set for nonresidential uses, which lists energy demand by building type.[69] Since the data from the CEUS is from 2002, the emissions modeling using the CalEEMod software

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67 South Coast Air Quality Management District, Air Quality Significance Thresholds, (March 2015), http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2. Accessed September 2018.

68 Gibson Transportation Consulting, Inc., Transportation Impact Study for the 550 S. Shatto Place Project, September 2018.

69 California Energy Commission, California Commercial End-Use Survey, http://capabilities.itron.com/CeusWeb/Chart.aspx. Accessed September 2018.

incorporates correction factors to account for compliance with the 2016 Title 24 Building Standards Code. The existing site uses were modeled using historical energy factors based on previous Title 24 standards.

Stationary source emissions were estimated separately outside of the CalEEMod software. The emergency generator, approximately rated at 1,200 kilowatts (1,609 horsepower) for the residential high rise building, would result in emissions associated with periodic maintenance and testing generator. Its emissions were calculated based on compliance with the mandated emission limits and operating hour constraints contained in SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines). As discussed previously, Rule 1470 applies to stationary compression ignition engines greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

Other area source emissions resulting from operation of the existing site uses and Project uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment criteria air pollutant emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)*.[70] The CalEEMod software estimates that landscaping equipment operates for 250 days per year in the Basin. Emissions of VOCs from the use of consumer products and architectural coatings were based on SCAQMD-specific emission factors for land uses in the Basin. The Project does not include any fireplaces or hearths within the residential units; therefore, the Project would not result in fireplace emissions.

Emissions calculations for the Project include credits or reductions for energy efficiency measures that are required by regulation, such as reductions in energy from the 2016 Title 24 standards and the California Green Building Standards (CALGreen) Code. The Project is also subject to the City's Green Building Code, which incorporates by reference the CALGreen Code, as well as additional City requirements. A summary of maximum daily regional emissions resulting from Project operation is presented in **Table 5-5**, *Maximum Net Regional Operational Emissions*, along with the SCAQMD's regional significance thresholds.

As shown in Table 5-5, the Project's maximum net regional operational emissions would not exceed the thresholds for non-attainment pollutants of ozone precursors (i.e., VOC and NO_X), PM10, and PM2.5. In addition, operational emissions from the Project would not exceed the SCAQMD regional significance thresholds for attainment or maintenance criteria air pollutants (i.e., CO and SO_2). Therefore, the Project would have a less-than-significant impact on air quality resulting from regional operational emissions, and no mitigation measures are necessary.

[70] California Air Resources Board, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, (6/13/2003), https://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_act.pdf. Accessed September 2018.

TABLE 5-5
MAXIMUM NET REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)

Operational Activity	VOC	NOx	CO	SOx	PM10	PM2.5
Project Emissions						
Area (Consumer Products, Landscaping, Natural Gas Fireplaces)	6	<1	21	<1	<1	<1
Energy (Natural Gas)	<1	1	1	<1	<1	<1
Motor Vehicles	2	11	26	<1	7	2
Stationary (Emergency Generator)[a]	1	24	14	<1	<1	<1
Project Total	**10**	**37**	**62**	**<1**	**7**	**2**
Existing Site Emissions						
Area (Consumer Products, Landscaping)	<1	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Motor Vehicles	1	4	12	<1	3	1
Existing Site Total	**1**	**4**	**12**	**<1**	**3**	**1**
Maximum Net Regional Emissions	**8**	**33**	**50**	**<1**	**5**	**1**
SCAQMD Threshold	55	55	550	150	150	55
Over/(Under)	**(47)**	**(22)**	**(500)**	**(150)**	**(145)**	**(54)**
Exceeds Threshold?	No	No	No	No	No	No

NOTES:
Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.

[a] Emergency generator emissions are based on regulatory compliance with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) and maintenance or testing for 2 hours in a single day.

SOURCE: ESA, 2018.

Quantitative Analysis Connecting the Project's Less Than Significant Air Pollutant Emissions and Human Health is Not Feasible

With respect to health impacts from the Project's criteria pollutant emissions, it is not scientifically feasible to provide a reliable quantitative analysis directly correlating a Project's regional pollutant emissions and human health. It is important to understand how criteria pollutants are formed and dispersed when discussing criteria pollutants effects on human health. As an example, ground level ozone formation occurs through a complex photo-chemical reaction between VOC and NO_X in the atmosphere with the presence of sunlight. The health consequences associated with ozone formation are typically considered on a basin-wide or regional basis instead of a localized basis. Because of the complexity of ozone formation and the non-linear relationship of ozone concentration with its precursor gases, and given the state of environmental science modeling in use at this time, it is infeasible to convert specific project emissions levels of VOC or NO_X emitted in a particular area to a particular concentration of ozone in that area. Meteorology, the presence of sunlight, seasonal impacts, and other complex photochemical factors all combine to determine the ultimate concentration and location of ozone. Furthermore, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify ozone-related health impacts caused by VOC or NO_X

emissions from an individual project.[71,72] Thus, it is infeasible to determine whether, or the extent to which, a single project's precursor (i.e., VOC and NO_X) emissions would potentially result in the formation of secondary ground-level ozone and the geographic and temporal distribution of such secondary formed emissions. Furthermore, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify ozone-related health impacts caused by VOC or NO_X emissions from local level (project level). As shown above, the Project's criteria pollutant emissions would be well below the significance thresholds; therefore, measurable health impacts from the Project's construction and operational emissions would not be expected to occur and health impacts would be less than significant.

Conclusion:

The Project's regional operational impacts would be less than significant, and mitigation measures are not required.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook,[73] a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities, (2) rehabilitation centers, (3) convalescent centers, (4) retirement homes, (5) residences, (6) schools, (7) parks and playgrounds, (8) childcare centers, and (9) athletic fields.

Air quality sensitive receptors located in close proximity to the Project Site include the following land uses:

- **North** – Land uses north of the Project Site consists of commercial uses, which are not air quality-sensitive uses, and air quality sensitive multifamily residential uses located within 170 to 900 feet of the northern boundary of the Project Site.
- **East** – Land uses immediately east of the Project Site consist of air quality sensitive multifamily residential uses, located within 10 feet of the eastern boundary of the Project Site.

[71] San Joaquin Valley Air Pollution Control District (SJVAPCD), 2014. Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party in Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno.

[72] South Coast Air Quality Management District (SCAQMD), 2014. Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno.

[73] South Coast Air Quality Management District, CEQA Air Quality Handbook, (1993), http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed October 2018.

- **South** – Land uses south of the Project Site consist of commercial uses, which are not air quality-sensitive uses, and the air quality sensitive Young Oak Kim Academy (school use) located 130 feet southwest of the southern boundary of the Project site.
- **West** – Land uses west of the Project Site include commercial buildings, an adult school (Nobel School of Business), and parking lots, none of which is an air quality-sensitive use. As stated above, this land use category does not meet the criteria of the land use categories that contain sensitive receptors.

Localized Construction Impacts

The localized air quality analysis was conducted using the methodology described in the SCAQMD *Localized Significance Threshold Methodology* (June 2003, revised July 2008).[74] The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized construction and operational emissions thresholds for the Project. The closest existing sensitive receptors to the Project Site are the multifamily residential uses immediately to the east of the Project Site and the Young Oak Kim Academy southwest of the Project Site. Therefore, the thresholds used for the LST analysis were based on the approximately 1.2-acre Project Site in the Central Los Angeles Source-Receptor Area with sensitive receptors located adjacent to the Project Site (i.e., 25 meters).

The localized effects from the on-site portion of the Project's daily emissions were evaluated at the sensitive receptor locations that would be potentially impacted by the Project according to the SCAQMD's localized daily significance threshold (LST) methodology. Daily localized emissions caused by the Project were compared to the LSTs in the SCAQMD's look-up tables to determine whether the emissions would cause violations of ambient air quality standards. The Project will incorporate PDF AIR-1 into the Project, which includes specific baseline development features that will be implemented by the Project Applicant and agreed to by the City. A discussion of the Project's localized construction emissions without implementation of PDF AIR-1 is included for informational purposes to disclose the emissions levels without the incorporation of these development features. **Table 5-6**, *Maximum Localized Construction Emissions Without PDF AIR-1*, and **Table 5-7**, *Maximum Localized Construction Emissions With PDF AIR-1*, present the project's localized construction emissions with and without PDF AIR-1, along with the localized significance thresholds for each air pollutant.

As shown in Table 5-6 and Table 5-7, the Project's maximum localized construction emissions would not exceed the thresholds for NO_X, CO, PM10, or PM2.5. Therefore, the Project's localized construction impacts would be less than significant, and mitigation measures are not required.

[74] South Coast Air Quality Management District, Localized Significance Thresholds, (2003, revised 2008), http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed October 2016.

TABLE 5-6
MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS WITHOUT PDF AIR-1 (POUNDS PER DAY)

Source	NOx	CO	PM10[a]	PM2.5[a]
Demolition – 2019	23	15	1	1
Grading/Excavation – 2019	28	19	4	3
Grading/Excavation – 2020	26	19	4	3
Utilities/Trenching – 2020	4	4	<1	<1
Foundations – 2020	22	19	1	1
Building Construction – 2020	17	15	1	1
Building Construction – 2021	16	14	1	1
Renovation of Existing Use – 2021	7	8	<1	<1
Architectural Coating/Finishing – 2021	2	2	<1	<1
Paving – 2021	7	8	<1	<1
Overlapping Phases				
2020				
Utilities/Trenching +Foundations	26	23	2	2
2021				
Building Construction + Renovation of Existing Use	22	22	1	1
Building Construction + Paving + Architectural Coating/Finishing + Renovation of Existing Use	24	25	1	1
Building Construction + Renovation of Existing Use + Architectural Coatings + Paving	31	33	2	2
Daily Maximum Emissions	**31**	**33**	**3.8**	**2.6**
SCAQMD Localized Significance Threshold[b]	74	680	5	3
Over/Under	**(43)**	**(647)**	**(1.2)**	**(0.4)**
Exceeds Threshold?	No	No	No	No

NOTES:
Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
[b] Localized thresholds based on a 1-acre site with a receptor distance of 25 meters in SRA #1: Central Los Angeles.

SOURCE: ESA, 2018.

TABLE 5-7
MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS WITH PDF AIR-1 (POUNDS PER DAY)

Source	NOx	CO	PM10[a]	PM2.5[a]
Demolition – 2019	1	15	<1	<1
Grading/Excavation – 2019	3	23	2	1
Grading/Excavation – 2020	3	23	2	1
Utilities/Trenching – 2020	2	4	<1	<1
Foundations – 2020	3	26	<1	<1
Building Construction – 2020	1	16	<1	<1
Building Construction – 2021	1	16	<1	<1
Renovation of Existing Use – 2021	2	17	<1	<1
Architectural Coating/Finishing – 2021	<1	2	<1	<1
Paving – 2021	1	9	<1	<1
Overlapping Phases				
2020				
Utilities/Trenching +Foundations	5	30	<1	<1
2021				
Building Construction + Renovation of Existing Use	4	33	<1	<1
Building Construction + Paving + Architectural Coating/Finishing + Renovation of Existing Use	4	35	<1	<1
Building Construction + Renovation of Existing Use + Architectural Coatings + Paving	5	44	<1	<1
Daily Maximum Emissions	**5**	**44**	**2.4**	**1.4**
SCAQMD Localized Significance Threshold[b]	74	680	5	3
Over/Under	**(69)**	**(636)**	**(3)**	**(2)**
Exceeds Threshold?	No	No	No	No

NOTES:
Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
[b] Localized thresholds based on a 1-acre site with a receptor distance of 25 meters in SRA #1: Central Los Angeles.

SOURCE: ESA, 2018

Localized Operational Impacts

The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized operational emissions thresholds for the Project. With regard to on-site sources of emissions, the Project would generate emissions resulting from sources such as natural combustion (on-site natural gas consumption for cooking and heating, such as natural gas combustion in commercial boilers and water heaters), landscaping equipment, and a diesel-fueled emergency generator. A summary of maximum daily localized operational emissions resulting from Project operations is presented in **Table 5-8**, *Maximum Localized Operational Emissions*, along with the localized significance thresholds.

TABLE 5-8
MAXIMUM LOCALIZED OPERATIONAL EMISSIONS (POUNDS PER DAY)

Operational Activity	NOx	CO	PM10	PM2.5
Project Emissions				
Area (Consumer Products, Landscaping, Natural Gas Fireplaces)	<1	21	<1	<1
Energy (Natural Gas)	1	1	<1	<1
Stationary (Emergency Generator)[a]	24	14	<1	<1
Project Total	**26**	**36**	**<1**	**<1**
Maximum Net Regional Emissions	**26**	**36**	**<1**	**<1**
SCAQMD Localized Significance Threshold[b]	74	680	2	1
Over/(Under)	**(48)**	**(644)**	**(2)**	**(1)**
Exceeds Threshold?	No	No	No	No

NOTES:
Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.

[a] Emergency generator emissions are based on regulatory compliance with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) and maintenance or testing for 2 hours in a single day.

[b] Localized thresholds based on a 1-acre site with a receptor distance of 25 meters in SRA #1: Central Los Angeles.

SOURCE: ESA, 2018.

As shown in Table 5-8, the Project's maximum localized emissions would remain below SCAQMD LST thresholds and localized operational impacts would be less than significant and no mitigation measures are required.

Carbon Monoxide Hotspots

According to the SCAQMD, high levels of CO are associated with traffic congestion and with idling or slow-moving vehicles.[75] Localized areas where ambient concentrations exceed State and/or federal standards are termed "CO hotspots."[76]

The SCAQMD recommends that a hotspot evaluation of potential localized CO impacts be conducted when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of D or worse. Based on the traffic impact analysis prepared for the Project (summarized in Item 5.17, *Transportation*, and attached as Appendix J to this SCEA), several intersections would be expected to operate at LOS D or worse during a.m. and p.m. peak hours with Project traffic.

For the purposes of providing a conservative, worst-case impact analysis, CO concentrations are typically analyzed for sensitive receptors located in proximity to congested intersections, because if impacts are less than significant in proximity to the congested intersections, impacts will also be less than significant at more distant sensitive receptor locations.

[75] South Coast Air Quality Management District, CEQA Air Quality Handbook, page 5-1, (1993).

[76] South Coast Air Quality Management District, CEQA Air Quality Handbook, page 5-1, (1993).

By way of background, carbon monoxide levels decreased dramatically in the Basin with the introduction of the automobile catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Basin in recent years, and the Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is not expected that CO levels at Project-impacted intersections would rise to such a degree as to cause an exceedance of these standards.

The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing impacted Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs. As discussed below, this comparison provides evidence supporting the conclusion that the Project would not cause or contribute to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four most congested intersections in the Basin. These included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.[77] This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.5 ppm (8-hour average) at Wilshire Boulevard and Veteran Avenue.[78] Existing maximum background concentrations for this Wilshire Boulevard and Veteran Avenues intersection are 2.2 ppm (1-hour average) and 1.1 ppm (8-hour average).[79] When added to the existing background CO concentrations, the screening values would be 6.8 ppm (1-hour average) and 4.6 ppm (8-hour average).

In comparison, based on the Transportation Study prepared for the Project, of the studied intersections that are predicted to operate at a Level of Service ("LOS") of D, E, or F under future year 2021 plus Project conditions, average daily traffic volumes would result in fewer than 100,000 vehicles per day.[80] Therefore, CO concentrations are expected to be less than the CO concentrations measured as part of the SCAQMD's 2003 AQMP CO attainment demonstration and would not exceed SCAQMD significance thresholds. This comparison provides evidence that the Project

[77] South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf?sfvrsn=2. Accessed November 2018.

[78] The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

[79] Background concentrations are provided from SCAQMD's Northwest Coastal Los Angeles County air monitoring areas. Data is from 2016, the most recent data available from SCAQMD.

[80] Table 10, Future with Project Conditions (2021), Gibson Transportation Consulting, Inc., Transportation Impact Study for the 550 S. Shatto Place Project, (2018) found in Appendix J.

would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the Project would result in less-than-significant impacts with respect to CO hotspots.

The proposed parking structure would be built in accordance with applicable LAMC requirements, and as such, would be required to provide adequate ventilation, such as mechanical air circulation and/or openings in the walls to allow for air circulation, and dispersion of potential emissions to acceptable ambient concentrations so as not pose any public health hazards. Therefore, the parking structure would result in less-than-significant impacts with respect to CO hotspots and no mitigation measures are required.

Toxic Air Contaminants

Construction of the Project would result in sensitive receptor exposure to temporary TAC emissions associated with DPM emissions from heavy construction equipment. As stated above, the nearest sensitive receptors are located directly to the east and southwest of the Project Site.

As discussed above under Item 5.3.a, *Air Quality*, the Project would not conflict with applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the renovation and construction activities. Emissions from construction equipment associated with the Project are expected to result in less than significant health risk impacts.

As the Project consists of residential, office, and restaurant uses, the Project would not include sources of substantive TAC emissions identified by the SCAQMD or CARB siting recommendations.[81] Thus, a qualitative approach to evaluating the Project's operational TAC impacts is appropriate. During long-term operations, the Project's uses would emit minimal amounts of TACs as part of periodic maintenance operations, cleaning, painting, etc., and from periodic visits from delivery trucks and service vehicles. However, these emissions are expected to be occasional and result in minimal exposure to off-site sensitive receptors. The emergency generator would operate a maximum of 50 hours per year for maintenance and testing activities, and be subject to the controls contained in SCAQMD's Rule 1470. The Project's restaurant operations would be subject to SCAQMD Rule 1138-Control of Emissions from Restaurant Operations. The Project would comply with this rule by installing a control device, such as a catalytic oxidizer, on all char broilers in order to reduce PM and VOC emissions. Thus, operation of the Project would result in less than significant health risk impacts.

[81] CARB, Air Quality and Land Use Handbook: A Community Health Perspective, p.1, April 2005. http://www.aqmd.gov/docs/default-source/ceqa/handbook/carb-handbook.pdf. Accessed November 2018.

Conclusion:

The Project's construction and operational impacts would be less than significant, and mitigation measures are not required.

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

Less Than Significant Impact. As stated above, the closest existing sensitive receptors to the Project are the multifamily residential uses to the immediate east of the Project Site, as well the Young Oak Kim Academy southwest of the Project Site.

Other Emissions

As discussed above in Issue b., the Project's maximum net regional construction and operational emissions would not exceed the regional thresholds for non-attainment pollutants of ozone precursors (i.e., VOC and NO_X), PM10, and PM2.5 or for attainment or maintenance criteria air pollutants (i.e., CO and SO_2). As discussed above in Issue c., the Project's maximum localized construction and operational emissions would not exceed the localized thresholds for NO_X, CO, PM10, and PM2.5. Therefore, the Project's construction and operational emissions impacts would be less than significant, and mitigation measures are not required.

Odors

Potential activities that may emit odors during construction activities include equipment exhaust, paving and painting activities. Such odors are localized, generally to the immediate area surrounding a construction site and transitory in nature. In addition, odors associated with construction activities are not those typically associated with odor complaints. As discussed previously, SCAQMD Rule 1113 will limit the amount of VOCs in architectural coatings and solvents. In addition, the Project will comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD Rules, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people. Therefore, impacts related to construction odors would be less than significant.

The Project's proposed uses are not expected to generate nuisance odors at nearby sensitive receptors during operation. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[82] The Project would not involve elements related to these types of uses. Restaurant uses could generate odors from cooking operations; however, the use of standard range hoods and proper cleaning of cooking equipment and housekeeping practices would prevent adverse odors. If charbroiling were to occur in the restaurant uses, emissions control requirements consistent

[82] South Coast Air Quality Management District, CEQA Air Quality Handbook, (1993), p.5-11 http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed October 2018.

with SCAQMD Rule 1138 would minimize the potential for odorous emissions (as well as TAC emissions).

Additionally, the existing Project Site is located adjacent to existing restaurant uses located to the west and east. As such, the Project would not introduce land uses associated with odorous emissions that are not already characteristic of similar uses within the vicinity. Barbeque grills that may be located within the proposed residential common areas would not be expected to generate objectionable odors affecting a substantial number of people because the quantity of meat would be orders of magnitude lower than at restaurants that can go through hundreds of pounds of meat per day, seven days per week.[83] While there is a potential for odors to occur, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance) and Rule 1138, and SCAQMD Best Available Control Technology Guidelines would limit potential operational odor impacts to less than significant.

Conclusion:

The Project's other emissions such as those leading to odors would be less than significant, and mitigation measures are not required.

Cumulative Impacts

The City has identified a number of related projects located in the Project Site area that have not yet been built or that are currently under construction. Since both the timing and the sequencing of the construction of the related projects are unknown, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. For this reason, the SCAQMD's recommended methodology for assessing a project's cumulative impacts differs from the cumulative impacts methodology employed elsewhere in this SCEA MND. The SCAQMD recommends using two different methodologies: (1) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality;[84] or (2) that a project's consistency with the current AQMP be used to determine its potential cumulative impacts.

SCAQMD Cumulative Impact Methodology

The SCAQMD CEQA Air Quality Handbook states that the "Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects."[85] The SCAQMD CEQA Air Quality Handbook also states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air

[83] South Coast Air Quality Management District, Proposed Amended Rule 1138 – Control of Emissions from Restaurant Operations, 2009. Available at http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1138/par1138pdsr.pdf?sfvrsn=2. Accessed September 2018.

[84] South Coast Air Quality Management District, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, Appendix D, 1993, page D-3, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4. Accessed May 2018.

[85] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, p. iii.

pollution thresholds established by the District."[86] The SCAQMD has also provided guidance on an acceptable approach to addressing the cumulative impacts issue for air quality as discussed below:[87]

> *"As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

The City relies on thresholds established by the SCAQMD (refer to State CEQA Guidelines Section 15064.7) to assess the Project's cumulative impacts. While it may be possible to add emissions from the list of related projects and the Project, it would not provide meaningful data for evaluating cumulative impacts under CEQA because neither the City nor the SCAQMD have established numerical thresholds applicable to the summation of multiple project emissions for comparison purposes. Additionally, regional emissions from a project have the potential to affect the Air Basin as a whole, and, unlike other environmental issues areas, such as aesthetics or noise, it is not possible to establish a geographical radius from a specific project site where potential cumulative impacts from regional emissions would be limited. Meteorological factors, such as wind, can disperse pollutants, often times tens of miles downwind from a project site. Therefore, consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the Project to results in cumulative impacts from regional emissions is assessed based on the SCAQMD thresholds.

Consistency with Air Quality Management Plan

Additionally, the SCAQMD recommends assessing a project's cumulative impacts based on whether the project is consistent with the current AQMP. State CEQA Guidelines Section 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

> *"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency."*

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86 South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, p. 6-1.

87 South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D. Available at: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4. Accessed November 2018.

For purposes of the cumulative air quality analysis with respect to State CEQA Guidelines Section 15064(h)(3), the Project's cumulative air quality impacts are determined not to be significant based on its consistency with the SCAQMD's adopted 2016 AQMP, as discussed above.

As discussed above, the Project construction would incorporate emission reduction strategies, as applicable, consistent with the 2016 AQMP. Construction of the Project would comply with SCAQMD Rule 403 requirements and the ATCM to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time. In addition, the Project would require construction contractor(s) to comply with required and applicable BACT and the In-Use Off-Road Diesel Vehicle Regulation. As discussed above, during its construction phase, the Project would ensure compliance with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, SCAQMD's Rule 403 and Rule 1113, fleet rules to reduce on-road truck emissions (i.e., 13 CCR, Section 2025, CARB Truck and Bus regulation). Project's short-term and temporary construction jobs would be within the growth projections contained in the 2016 RTP/SCS upon which the 2016 AQMP was based. As such, Project construction would be consistent with the 2016 AQMP, and impacts with respect to AQMP consistency would be less than significant.

The Project's location, design, and proposed land uses would also be consistent with the 2016 AQMP. The 2016 AQMP includes transportation control strategies intended to reduce regional mobile source emissions that the Project would promote.[88] The Project would be developed at an urban, infill site in close proximity to existing residential uses, businesses, services, and numerous public transportation options. Specifically, the Project Site is less than 500 feet from the Wilshire/Vermont Metro Rail Station which serves the Metro Purple Line and the Metro Red Line. The Project Site is also in close proximity to several bus lines including Metro Lines 18, 51, 52, 201, 204, and 351 and the Wilshire Center/Koreatown DASH line. The new residential population would have access to the restaurant and office development onsite as well as commercial, restaurant, and other services within walking distance. The Project's proximity to public transit would allow the Project's projected growth to be accommodated by existing transportation resources and decreases the time and cost of traveling as well as vehicular demand and associated pollutants. As is also discussed below, the Project's increase in population, housing, and employment would also be consistent with the 2016 RTP/SCS growth projections (refer to Item 5.14, *Population and Housing*), upon which the 2016 AQMP is based. Moreover, as discussed above, the Project's growth would occur on a site well-served by public transportation and in proximity to existing employment and commercial areas, which would minimize potential growth in transportation-related emissions. As such, as the Project would be consistent with and would not conflict with or obstruct implementation of the 2016 AQMP. Therefore, the Project's cumulative impacts with respect to AQMP consistency would be less than significant and would not be cumulatively considerable.

[88] Through capital improvement programs, local governments can fund infrastructure that contributes to improved air quality by requiring such improvements as bus turnouts as appropriate, installation of energy-efficient streetlights, and synchronization of traffic signals.

Project-Specific Impacts

As displayed in Tables 5-3 through 5-8, regional emissions calculated for Project construction and operations would be less than the applicable SCAQMD daily significance thresholds, which are designed to assist the region in attaining the applicable State and national ambient air quality standards. These standards apply to both primary (criteria and precursor) and secondary pollutants (ozone). Although the Project Site is located in a region that is in non-attainment for ozone, PM10, and PM2.5, the emissions associated with the Project would not be cumulatively considerable as the emissions would fall below SCAQMD daily significance thresholds. In addition, the Project would not conflict with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants.

Localized emissions from construction and operations would be below the applicable localized numeric indicators and, therefore, cumulative impacts related to localized emissions would be less than significant.

As discussed above, the Project would result in less-than-significant impacts for TAC emissions and other emissions (such as odors). Project compliance with applicable SCAQMD rules and AQMP control measures, as discussed below, would ensure Project construction and operations would minimize exposure to TACs. As a result, cumulative impacts would be less than significant and would not be cumulatively considerable.

Conclusion:

The Project's construction and operational cumulative impacts would be less than significant and would not be cumulatively considerable, and mitigation measures are not required.

5.4 Biological Resources

The following discussion regarding Biological Resources is based, in part, on the technical report prepared for the Project, entitled *City of Los Angeles Tree Report, 550 Shatto Place*, prepared by Carlberg Associates, dated May 14, 2018, and contained in Appendix C.

Would the project:

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

Less Than Significant with Mitigation Incorporated. The Project Site is located in a highly urbanized area and is currently developed with school-related buildings and a surface parking lot. Therefore, the only biological resources permanently located on the Project Site are trees, shrubs and other plants. As stated in the technical report entitled *City of Los Angeles Tree Report, 550 Shatto Place*, prepared by Carlberg Associates, dated May 14, 2018 (contained in Appendix C), there are no protected trees within the Project Site. Trees that are designated as "protected trees," as defined by LAMC Section 17.02, include the following trees that have a diameter at breast

height (dbh): oak trees (*Quercus* spp.), southern California black walnuts (*Juglans californica*), western sycamores (*Platanus racemosa*), and California bay laurels (*Umbellularia californica*).

There are 12 trees on the Project Site and eight City trees within the Project's right-of-way (five along Shatto Place and three along 6th Street). These trees include:

- **Shatto Place Frontage:** Along the Project's right-of-way, there are five City of Los Angeles street trees: queen palms (*Syagrus romanzoffiana*). Within the Project Site boundaries, there are four tipu trees (*Tipuana tipu*) that front the surface parking lot that are non-protected. Also along Shatto Place, are two Hollywood junipers (*Juniperus chinensis 'Torulosa'*) and one lemon-scented gum (*Corymbia citriodora*).
- **6th Street Frontage:** Along the Project's right-of-way, there are three City of Los Angeles street trees: queen palms (*Syagrus romanzoffiana*). Within the Project Site boundaries there is one Hollywood juniper (*Juniperus chinensis 'Torulosa'*) that fronts the former church building.
- **Project Site Interior:** Within the surface parking lot near the classroom buildings, are four trees: a crape myrtle (*Lagerstroemia indica*); a fern pine (*Afrocarpus falcatus*); an umbrella tree (*Schefflera actinophylla*); and a Hong Kong orchid.

The Project would remove the 12 existing trees on the Project Site. The three street trees along West 6th Street would remain in place, while four street trees along Shatto Place would be removed and one would remain. The Project would provide 64 trees in total, including three new street trees along West 6th Street and five new street trees along Shatto Place, for a net increase of 44 trees.

As discussed above, most of the Project site is developed with urban uses and does not contain or provide habitat that supports candidate, sensitive or special status species However, the loss of trees may result in potential impacts that may be significant related to species identified as a candidate, sensitive, or special status species unless mitigation is incorporated. As such, MM BIO-1 and MM BIO-2 are included. MM BIO-1 requires that prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. MM BIO-2 requires that the removal or planting of a tree in the public right-of-way requires the prior approval of the Board of Public Works and all trees in the public right-of-way shall be provided at a 2 to 1 ratio.

Mitigation Measures

MM BIO-1: Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.

MM BIO-2: Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at 213-847-3077. All trees in the public right-of-way shall be provided at a 2 to 1 ratio per the standards of the Urban Forestry Division, Bureau of Street Services, Department of Public Works.

Conclusion:

Based on the impact analysis, and compliance with mitigation measures MM BIO-1 and MM BIO-2, any impact would be reduced to less than significant.

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

No Impact. The Project Site is located in an urbanized area of the City. The Project Site is developed with school-related buildings and a surface parking lot and does not contain riparian habitat or sensitive natural community. The Project Site is not located within or adjacent to a significant ecological area (SEA).[89]

Conclusion:

As the Project is located in an urbanized area and development of the Project would not result in any adverse effect on riparian habitat or other sensitive natural community. No impact would occur and no mitigation measures are required.

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

No Impact. The Project Site is located in an urbanized area of the City. The Project Site is developed and the pervious areas are landscaped with non-native species and do not contain Federally protected wetlands.

Conclusion:

As the Project would not impact Federally protected wetlands, no impacts would occur. No mitigation measures are required.

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

Less Than Significant with Mitigation Incorporated. The Project Site is currently developed and located in a highly urbanized area in the City of Los Angeles. No wildlife corridors or native wildlife nursery sites are present on the Project Site or in the surrounding area. Further, due to the urbanized nature of the Project Site area, the potential for native resident or migratory wildlife species movement through the Site is negligible.

Nonetheless, the Project Site does include ornamental trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under

[89] City of Los Angeles General Plan Conservation Element, Exhibit B2, SEAs and other Resources, March 2001. http://planning.lacity.org/cwd/gnlpln/consvelt.pdf. Accessed September 2018.

the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). California Fish and Wildlife Code Sections 3503, 3503.5, and 3513 prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. However, while the Project would remove 12 trees on the Project Site and four street trees along Shatto Place, the effects of this removal would be temporary, as the Project would provide 64 trees on the Project Site, resulting in a net increase of 44 trees, such that the Project would provide greater habitat area for birds.

Nevertheless, the Project would include MM BIO-3 that would protect nesting native bird species, by avoiding nesting bird season and if that is not possible, would require the Applicant to retain a qualified biologist to prepare a nesting bird survey if any construction activities occur in the nesting season (February 15 to August 31st. If any nests are identified, an appropriate buffer as determined by the biological monitor, shall be delineated, flagged, and avoided to the extent feasible until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

Mitigation Measure

MM BIO-3:

The Project will result in the removal of vegetation and disturbances to the ground and therefore may result in take of nesting native bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

- Proposed Project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).
- If Project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
    a) Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
    b) If a protected native bird is found, the Applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.

c) Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

d) The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

Conclusion:

Compliance with federal and state regulations related to the protection of migratory fish and wildlife species, and implementation of MM BIO-3, would reduce impacts to less than significant.

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

Less Than Significant Impact With Mitigation. There are no native tree species within the Project Site that would be subject to the protection of Ordinance No. 177404 of the LAMC (Section 1, Subdivision 12, of Subsection A of Section 12.21, as amended). However, there are 16 existing non-native, non-protected trees that would be removed as part of the Project. The Project would remove 12 non-native, non-protected existing trees on the Project Site. The three street trees along West 6th Street would remain in place, while four street trees along Shatto Place would be removed and one street tree would remain. The Project would provide 64 trees in total, including three new street trees along West 6th Street and five new street trees along Shatto Place, for a net increase of 44 trees.

For trees removed from the Project Site, the Project Applicant would be required to comply with MM BIO-1 and MM BIO-2. MM BIO-1 would require that prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. MM BIO-2 would require that prior to the removal or planting of any street tree or street in the public right-of-way would require approval and replacement of trees per the requirements of the Board of Public Works.

Conclusion:

Compliance with the implementation of MM BIO-1 and MM BIO-2 and applicable City requirements would ensure that impacts related to local policies and ordinances protecting biological resources would be reduced to less than significant.

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

No Impact. The Project Site is located in an urbanized area of the City. The Project Site is not located within a Significant Ecological Area (SEA).[90] Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place that includes the Project Site.[91,92,93] Therefore, implementation of the Project would not conflict with a habitat conservation plan and no mitigation measures are necessary.

Cumulative Impacts: Biological Resources

Similar to the Project, the majority of the related projects occurring in the Project Site area would occur on previously disturbed, urbanized land. As discussed above, the Project Site does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and therefore could not contribute to a cumulative effect in these regards. The Project would fully comply with City ordinances and MM-BIO-1 and MM BIO-2 pertaining to tree removal. Further, any potentially significant impacts to nesting birds would be reduced to a less-than-significant level with implementation of the identified mitigation measure MM BIO-3. Related projects would also be required to comply with the City's tree requirements and to adhere to the MBTA and Fish and Wildlife code provisions; therefore, cumulative impacts to nesting birds would be less than significant.

Conclusion:

Compliance with applicable regulatory requirements and plans, and implementation of MM BIO-1, MM BIO-2, and MM BIO-3 would ensure that cumulative impacts to biological resources would be less than significant.

5.5 Cultural Resources

The following discussion regarding Cultural Resources is based, in part, on the technical report prepared for the Project, entitled *Historical Resources Assessment Report (HRA) for 550 S. Shatto Place*, prepared by Historic Resources Group prepared in April 2019 and contained in Appendix D and the *Archaeological Resources Assessment Report* prepared by ESA in September 2018.

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90 Los Angeles County Significant Ecological Areas and Coastal Resource Areas Policy Map, http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf, Accessed January 2017.

91 California Regional Conservation Plan, August 2015, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, Accessed September 2018.

92 Habitat Conservation Plans – Region 8, http://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP,Accessed September 2018.

93 Habitat Conservation Plan Documents, https://www.fws.gov/carlsbad/hcps/HCP_Docs.html, Accessed September 2018.

Would the project:

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

Less Than Significant with Mitigation Incorporated. Existing uses at the Project Site include a former church building constructed in 1936 for the First English Evangelical Lutheran Church; two school buildings constructed in 1953 and 1964; and restroom and storage facilities constructed in 2004. The Project would demolish the two school buildings, restroom and storage facilities and would rehabilitate the former church building for new use as restaurant space.

As discussed in the *HRA for 550 S. Shatto Place* prepared for the Project, the 1936 former church building on the Project Site was identified by SurveyLA, the citywide historic resources survey overseen by the City of Los Angeles' Office of Historic Resources, as appearing to be eligible through survey evaluation for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a local Historic-Cultural Monument. It was documented under the context "Architecture and Engineering, 1850–1980," and the theme "Mediterranean and Indigenous Revival Architecture, 1887–1952" as an excellent example of Spanish Colonial Revival institutional architecture. Therefore, the church building is treated as a historical resource as defined by CEQA. Two Mid-century Modern buildings (constructed in 1953 and 1964) on the Project Site were not identified as significant by SurveyLA.

The *HRA for 550 S. Shatto Place* evaluates the two Mid-century buildings for potential historical significance, based on an observation of existing conditions on the Project Site, primary and secondary source research related to the history of the property, review of the relevant historic contexts, and an analysis under the eligibility criteria and integrity thresholds for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument. A site visit was conducted on December 13, 2017. The *HRA for 550 S. Shatto Place* confirms the SurveyLA finding that the two post-World War II buildings on the Project Site are not significant. Therefore, they are not considered historical resources for purposes of CEQA.

There are two potential historical resources immediately adjacent to the Project Site, one is located at 3109 West 6th Street, the second at 523 South Westmoreland Avenue. Both buildings were identified as a potential historical resource by SurveyLA during the survey of the Wilshire Community Plan Area.

3109 West 6th Street is located immediately adjacent to the Project Site to the east. It is a two-story mixed-use building, designed in the Mediterranean Revival style and constructed in 1924.

The San Mar Manor apartments, at 523 South Westmoreland Avenue, is located immediately adjacent to the Project Site to the east. It is a four-story multifamily residential building, designed in the Tudor Revival style and constructed in 1925.

A substantial adverse change in the significance of a historical resource is considered a potentially significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that

the significance of an historical resource would be materially impaired. Direct impacts are those that cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historic property such that the significance of a historical resource would be materially impaired.

Direct Impacts

Potential Impacts from Demolition

While the Project would demolish the two classroom buildings, constructed in 1953 and 1964, as discussed in the *HRA for 550 S. Shatto Place*, neither of these buildings was identified by SurveyLA as historically significant and neither is eligible for listing in the National Register, the California Register, or as a City of Los Angeles Historic-Cultural Monument. The buildings are typical, undistinguished examples of institutional architecture of the period; they do not embody the distinctive characteristics of Mid-century Modern design; and they do not possess high artistic value. The buildings reflect trends in school design from the period, but do not represent an important association with postwar institutional development. Therefore, these structures on the Project Site do not qualify as historical resources under CEQA. Therefore, the Project's associated demolition of these structures would have no direct impact to historical resources on the Project Site.

Potential Impacts from New Construction

The Project would construct a new 31-story, mixed-use high-rise tower adjacent to the former church building on the Project Site. The proposed new construction is not considered an "addition" to the former church building because it is conceived and designed as a building separate and distinct from the church building; it would be structurally independent, and it would read as a separate building when encountered from the public right-of-way. After implementation of the Project, the shape and form of the adjacent former church building would remain intact and its architectural features would remain viewable and understandable from the exterior.

As discussed in the *HRA for 550 S. Shatto Place*, the former church building does not derive historical significance from association with any persons or events. The only aspect of the former church building's integrity that is potentially affected by the Project is its setting. The Project would occupy the northern portion of the property on which the former church building is located and would construct a 31-story high-rise tower, more than fifteen times as tall as the two-story former church building. The immediate environs of the former church building would be considerably altered on its north side, thus altering the property's integrity of setting.

However, the former church building was identified in SurveyLA as significant for its Spanish Colonial Revival architecture, which is expressed primarily on the west and south façades, facing Shatto Place and 6th Street respectively. The Project would have no impact on these façades, and the former church building's Spanish Colonial Revival architecture would remain unaltered.

As such, the Project would not materially impair the former building such that it can no longer convey any potential historic significance. After construction of the Project, the former church building's Spanish Colonial Revival architecture would remain intact, and the building would remain eligible for historic designation as identified in SurveyLA. The Project would excavate for

a four-level subterranean parking structure adjacent to the former church building. As discussed in Section 5.13, Noise, the implementation of Mitigation Measures MM NOISE-5, MM NOISE-6, and MM NOISE-7 the potential for impacts during construction on historical resources is reduced to less than significant.

Potential Impacts from Alteration

The Project would rehabilitate the former church building for new use as restaurant space. The rehabilitation would include the addition of an elevator and small lobby on the north façade, to provide access to the second floor; the addition of new entrance/egress doors on the north façade; the addition of wide bi-folding glass doors between the buttresses on the south façade, to open the former sanctuary to the arcade and new dining patio; replacement of the existing paneled wood doors at the main entrance with new glass doors (the original doors will be stored on site); replacement of the existing stained glass with new stained glass in a new pattern, within the existing window sash; the addition of two new windows at the second story on the south façade; the addition of two new windows and a storefront opening on the east façade; the replacement of two pairs of wood doors on the east façade with glass doors; the addition of two skylights on the east side of the roof; and the addition of two skylights on the north side of the roof. The Project would also add a gateway at the southeast corner of the former church building, along 6th Street. The gateway would be constructed of metal and glass and would include a stained-glass screen that wraps the southeast corner of the former church building at the second story.

The elevator and lobby addition is located near the rear of a secondary façade, and thus will be minimally visible from the public right-of-way. It would be proportionally small in size, in comparison to the church building; it will be lower in height than the roof ridge of the former sanctuary; and it will be minimalist in design. The added doors on the north façade, and the added skylights on the north side of the roof, are on a secondary façade that would not be highly visible from the public right-of-way. The doors would be minimalist in design and would be aligned with the existing clerestory windows above and would retain the high wall-to-opening ratio of the church's original design.

The added bi-fold doors on the south façade would maintain the rhythm of the sanctuary's bays between the existing buttresses, although they would pierce a formerly blank wall. The doors would be largely concealed from view of the public right-of-way by the existing arcade that runs along the sanctuary's south façade, so the overall appearance of the church building would remain intact. The existing paneled wood entrance doors would be replaced but will be stored on-site for future re-use; the new glass doors would be minimalist in design to differentiate them from the original building. Similarly, the existing steel sash windows would be retained; the existing stained glass will be removed and stored on site. New stained glass would be installed, in a contemporary but compatible design that is better-suited to the building's new use. The existence and condition of the rose window and tympanum would be verified during construction; if they are extant and intact, they would be retained.

The added windows on the south and east façades of the two-story portion of the building would maintain the pattern of the original openings, but would be differentiated by their simple single-light design. Those on the east façade, together with the added skylights and replaced doors,

would be located on the back of the building and would be minimally visible, if at all, from the public-right-of way.

The proposed glass-and-metal gateway at the southeast corner of the former church building would be located on secondary façades and would not alter the primary façade of the building. The gateway will be additive in nature and reversible and would not alter any existing features of the former church building. It would be minimalist in design so as to be both differentiated from, and subordinate to, the former church building.

The proposed alterations would thus minimally alter the appearance of the former church building as viewed from the public right-of-way. The building's Spanish Colonial Revival architecture would remain intact, and it would retain integrity of location, design, materials, workmanship and feeling.

Indirect Impacts to Historic Resources

3109 West 6th Street

The Project would occupy a portion of a parcel which is immediately adjacent to 3109 W. 6th Street. The Project would demolish the two classroom buildings constructed in 1953 and 1964 and construct a high-rise tower of approximately 31 stories, adding considerable height to the immediate surroundings of the two-story commercial and residential building. The immediate environs of 3109 West 6th Street would be considerably altered on its western boundary, altering the property's integrity of setting.

However, 3109 West 6th Street is significant for its historic character as a commercial building constructed along a former streetcar line, which is expressed on the south (primary) façades, facing West 6th Street. The Project would have no impact on this façade or the building's orientation toward the street. The west and north façades, would face the proposed new construction, are unornamented and historically intended to be adjacent to another building or to function as a utilitarian, rear façade. The building's setting at its westward boundary is therefore not critical to understanding the property's history and significance.

Therefore, while the Project would alter the setting of 3109 West 6th Street, it would not materially impair the building such that it can no longer convey its historic significance. After completion of the Project, 3109 West 6th Street's historic orientation toward West 6th Street and its location along a former streetcar line would remain intact, and the property would remain eligible for historic designation as identified in SurveyLA.

523 South Westmoreland Avenue

The Project construct a new high-rise tower adding considerable height to the immediate surroundings of the four-story apartment building. The immediate environs of 523 South Westmoreland Avenue would be considerably altered on its western boundary.

However, 523 South Westmoreland Avenue is significant for its historic character as a brick apartment house. The building's design features are expressed primarily on its east (primary) façade, facing South Westmoreland Avenue. The Project would have no impact on this façade or

the building's historic character as a brick apartment building. The west façade, which would face the Project's new tower, is unornamented and historically intended to function as a utilitarian, rear façade. The building's setting is therefore not critical to understanding the property's history and significance.

While the Project would alter the setting of 523 South Westmoreland Avenue, it would not materially impair the building such that it can no longer convey its historic significance. After construction of the Project, the apartment building's historic character as a brick apartment house will remain intact, and the property would remain eligible for historic designation as identified by SurveyLA.

Conclusion:

Based on the impact analysis and compliance with the implementation of Mitigation Measures MM NOISE-5, MM NOISE-6, and MM NOISE-7, any potential impacts to historical resources during construction would be reduced to less than significant.

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

Less Than Significant with Mitigation Incorporated. A records search for the Project was conducted on April 17, 2018, at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. The records search included a review of all recorded archaeological resources and previous studies within and within a 1-mile radius of the Project Site. The records search results indicate that 89 cultural resources studies have been conducted within a 1-mile radius of the Project Site. Of the 89 previous studies, none overlaps with the Project Site and no archaeological resources have been previously documented within the Project Site. The records search results indicate that one historic-period archaeological resource (P-19-003301) has been previously recorded within a 1-mile radius of and within close proximity to the Project Site.

Resource P-19-003301 is located approximately 110 feet southwest of the Project Site and is comprised of a refuse deposit (one amber glass bottle, one amber bottle base, a green glass shard, and building materials, such as tile, fire brick, and cement) discovered during construction monitoring for the Los Angeles Metro Red Line Project, Segments 2 and 3. Information indicates that grading activity destroyed a portion of resource P-19-003301, as well as some artifacts found within it.

An archaeological resources survey of the Project Site was conducted on May 8, 2018, as summarized in the Historic Resources Assessment. The survey was aimed at identifying surface evidence of archaeological resources within the Project Site. The survey did not yield the identification of any archaeological resources or other indicators of cultural resources.

Known Resources

No known archaeological resources were identified within the Project Site as a result of this assessment. However, one historic-period archaeological resource (P-19-003301), consisting of a refuse deposit, has been recorded approximately 110 feet southwest of the Project Site, but this

resource would not be impacted by the Project. Therefore, the Project would not impact any known archaeological resources.

Unknown Resources

A geoarchaeological review conducted for the Project indicates that the Project Site has a low sensitivity for encountering prehistoric archaeological resources since there is a lack of deposits dating to the latest Pleistocene (the last part of the Late Pleistocene, not the entirety of the Pleistocene period) and Holocene, the period for which there is widely accepted evidence for human inhabitance of Southern California. Nevertheless, the Project Site contains approximately 5 feet of fill placed in the historic period, which is considered sensitive for historic-period archaeological resources.

Historic-period archaeological resources, should they exist within the Project Site, could be related to the previous land uses (associated with historic residences). Therefore, it is possible that foundations of structures, building materials, and trash scatters could be found. These trash scatters could yield domestic refuse (such as serving ware, cook ware, and discarded food remains); and personal items (including items such as buttons; medicine, perfume, liquor, and household bottles; and toys). Since Project-related excavation is expected to extend to 60 feet below the existing surface, it could encounter historic-period archaeological resources within the upper 5 feet. If Project construction encountered subsurface historic-period archaeological resources that qualify as historical or unique archaeological resources in a manner that would damage or destroy such resources, the Project could result in a potentially significant impact to archaeological resources.

As described in Table 3-3, the Project has substantially incorporated Mitigation Measure MM-CULT-2(b). In addition, the Project includes the following Project-specific mitigation measures:

Mitigation Measures

MM CULT-1: Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction activities on the Project Site such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The activities to be monitored shall also include off-site improvements in the vicinity of the Project Site that involve ground disturbance, such as utility, sidewalk, or road improvements which would encounter soils that could potentially contain archaeological resources down to a depth of 5-feet. The monitor shall have the authority to direct the pace of construction equipment in areas of higher sensitivity. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the qualified Archaeologist, will focus on how to identify archaeological resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event.

MM CULT-2: In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 25-foot buffer shall be established by the qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the qualified Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a "historical resource" pursuant to State CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to PRC Section 21083.2(g), the qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. If any prehistoric archaeological sites are encountered within the project area, consultation with interested Native American parties will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment under CEQA. If in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified Archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.

MM CULT-3: Prior to the release of the grading bond, the qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Project Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the development and required mitigation measures.

Conclusion:

Based on the impact analysis and compliance with the implementation of MM CULT-1 through MM CULT-3, any potentially significant impacts to archaeological resources would be reduced to less than significant.

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

Less Than Significant. The Project Site is developed with school-related buildings and a surface parking lot. Although the Project Site has been subject to grading and development in the past, the Project would require excavations at a depth of approximately 60 feet below ground surface.

As a result, construction may disturb human remains, including those interred outside of dedicated cemeteries. Such an event is a potentially significant impact under CEQA.

On April 20, 2018, the Applicant team contacted the California Native American Heritage Commission (NAHC) to request a search of the Sacred Lands File (SLF). The NAHC responded to the request in a letter dated April 23, 2018, which stated that the SLF search yielded negative results indicating no known resources at the Project Site. However, the letter also stated that "the absence of specific site information … does not indicate the absence of Native American cultural resources" within a Project Site. As described below in Section 5.18, no substantial evidence of any possible human remains was provided to the City during AB 52 tribal consultation.

Archival research did not reveal any evidence that human remains could be found at the Project Site or in the area adjacent to the Project Site. Even so, construction of the Project could potentially disturb previously unknown human remains. California PRC Section 5097.98, as amended by Assembly Bill 2641, protects cultural resources and provides procedures in the event human remains of Native American origin are discovered during Project implementation and land owners are required to address the Project's potential impacts to human remains. PRC Section 5097.98 requires notification of the County Coroner in the event of the unanticipated discovery of human remains and a prescribes protocol for their disposition in accordance with applicable regulations, notification of the NAHC and subsequent tribal coordination if remains are determined to be of Native American descent.

Conclusion:

Compliance with regulatory requirements would ensure that impacts to human remains would be less than significant. No mitigation measures are required.

Cumulative Impacts: Cultural Resources

Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis.

Cumulative impacts would occur if the Project and related projects were to have combined significant adverse effects on historical resources of the same type in the immediate vicinity, or if they were to contribute to changes within a historic district; however, there are no historical resources on the Project Site. Of the 118 related projects and one related infrastructure project, none is located within the immediate vicinity of the Project and all are isolated by intervening development and located in a number of locations of varying character and context. As discussed above, the Project would not result in direct or indirect impacts to historical resources, and, as such, the Project's effects would not be cumulatively considerable, and cumulative impacts would be less than significant.

Many of the related projects would require excavation that could potentially expose or damage potential archaeological resources or disturb human remains. However, the related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of

respective sites, mitigation measures and compliance with regulatory measures for the protection of human remains, would be identified for those related projects that have the potential to cause significant impacts to undiscovered archaeological resources or to disturb human remains.

Conclusion:

Compliance with MM CULT-1 through MM CULT-3 and regulatory compliance measures, any potentially significant impacts to archaeological resources, paleontological resources and human remains would be reduced to a level that would not be cumulatively considerable.

5.6 Energy

Would the project:

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

Less Than Significant Impact. As demonstrated in the analysis of the eight criteria discussed below, the Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with future projections of electricity and natural gas supplies for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operations. During operations, the Project would comply with and exceed the minimum requirements of the existing energy efficiency requirements such as the 2016 Title 24 standards and CALGreen Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards.

The following analysis considers the topics identified above under both Appendices G and F of the State CEQA Guidelines to determine whether this significance threshold would be exceeded.

- ***The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.***

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction and operations). For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping and architectural coatings, which are included as part of Project operations.

Construction

During Project construction, energy would be consumed in the form of electricity associated with electric-powered cranes and welders, the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the construction of new mixed-use high-rise building and renovation of the former church for restaurant uses, typically do not involve the consumption of natural gas. However, with incorporation of PDF AIR-1, the project would use natural gas-powered forklifts to offset diesel emissions and fuel consumption. Project construction would consume transportation energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

As shown in **Table 5-9**, *Summary of Energy Use During Project Construction*, a total of up to approximately 347,224 kWh of electricity with implementation of PDF AIR-1, up to approximately 452,747 cubic feet (cf) of natural gas with implementation of PDF AIR-1, approximately 65,412 gallons of gasoline, and approximately 146,376 gallons of diesel with implementation of PDF AIR-1 (approximately 174,566 gallons of diesel without implementation of PDF AIR-1) is estimated to be consumed during Project construction. Project construction is expected to be completed by 2021. For informational purposes on diesel fuel savings from incorporation of PDF AIR-1, Table 5-9 provides a range of values for electricity, natural gas, and diesel fuel consumption during construction. PDF AIR-1 would increase electricity and natural gas use during construction to power cranes, welders, and forklifts, but would decrease diesel fuel consumption and associated emissions. References to energy consumption in the text of this section assume incorporation of PDF AIR-1 (see Item 5.3, *Air Quality*, for detailed description of PDF AIR-1).

TABLE 5-9
SUMMARY OF ENERGY USE DURING PROJECT CONSTRUCTION

Energy Type	Total Quantity[a]	Annual Average Quantity During Construction[a]
Electricity		
Existing Site	N/A	103,303 kWh
Project Construction:		
Water Consumption	22,761 kWh	10,505 kWh
Electrically powered Construction Equipment[b]	0 to 324,463 kWh	0 to 149,752 kWh
Lighting, Electronic Equipment, Other[c]	N/A	N/A
Total Net Electricity	**N/A**	**-92,798 to 56,954 kWh**
Natural Gas		
Existing Site	N/A	142,813 cf
Project Construction:		
Forklifts[b]	0 to 452,747 cf	0 to 208,960 cf
Total Net Natural Gas	**N/A**	**-142,813 to 66,147 cf**
Gasoline		
Existing Site	N/A	57,318 gallons
Project Construction:		
On-Road Construction Equipment	65,412 gallons	30,190 gallons
Off-Road Construction Equipment	0 gallons	0 gallons
Total Net Gasoline	**N/A**	**-27,128 gallons**
Diesel		
Existing Site	N/A	5,626 gallons
Project Construction:		
On-Road Construction Equipment	81,795 gallons	37,751 gallons
Off-Road Construction Equipment	64,581 to 92,771 gallons	29,807 to 42,009 gallons
Total Net Diesel	**N/A**	**61,932 to 74,134 gallons**

NOTES:
Detailed calculations are provided in Appendix M of this SCEA. Based on Project Construction Schedule
kWh = kilowatt-hours; N/A = not applicable

[a] Totals may not add up due to rounding of decimals.

[b] Range of energy use calculated based on scenarios with and without PDF AIR-1. With PDF AIR-1 incorporated, cranes and welders would be electric-powered and forklifts would be natural gas-powered. Electricity and natural gas use would increase during construction and diesel fuel use would decrease.

[c] Electricity usage associated with this line item would be very limited and small in scale.

SOURCE: ESA, 2018.

Electricity

Electricity demand from the existing on-site uses would cease during Project construction since the existing classroom facilities would be removed and operation of the school facilities within the existing church building would be curtailed for renovation. During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities

necessitating electrical power. With implementation of PDF AIR-1, electricity would be used for cranes and welders. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. This would be consistent with suggested measures in the CEQA Thresholds Guide to use electricity from power poles rather than temporary gasoline or diesel-powered generators.

As shown in Table 5-9, with implementation of PDF AIR-1, an annual average of approximately 160,257 kWh of electricity is anticipated to be consumed during Project construction, or a net annual average of 56,954 kWh after subtracting the electricity demand from the existing setting that would no longer occur. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

The estimated annual average construction electricity usage would be within the supply and infrastructure service capabilities of LADWP, as the construction demand would represent approximately 2.0 percent of the estimated net annual operational electricity demand for the Project, which, as shown below, would be within the supply and infrastructure service capabilities of LADWP.[94,95]

Natural Gas

Construction activities, including the construction of new buildings and facilities, would consume natural gas to power forklifts. As discussed above, the incorporation of PDF AIR-1 offsets diesel fuel use by replacing diesel-powered forklifts with cleaner burning natural gas. As shown in Table 5-9, with implementation of PDF AIR-1, an annual average of approximately 208,960 cf of natural gas is anticipated to be consumed during Project construction, or a net annual average of 66,147 cf after subtracting the natural gas demand from the existing setting that would no longer occur.

The estimated annual average construction natural gas usage would be within the supply and infrastructure service capabilities of SoCalGas, as the construction demand would represent approximately 1.3 percent of the estimated net annual operational natural gas demand for the Project, which, as shown below, would be within the supply and infrastructure service capabilities of SoCalGas.[96]

[94] The percentage is derived by taking the annual average amount of electricity usage during the Project construction (56,954 kWh) and dividing that number by the annual amount of net electricity usage during Project operation (2,779,381 kWh) to arrive at 0.37 percent.

[95] Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, Appendix A, 2016. Available at: https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB562207&RevisionSelectionMethod=LatestReleased. Accessed November 2018.

[96] The percentage is derived by taking the annual average amount of electricity usage during the Project construction period (10,307 kWh) and dividing that number by the annual amount of net electricity usage during Project operation (2,779,381 kWh) to arrive at 0.37 percent.

Transportation Energy

The petroleum-based fuel summary provided in Table 5-9 for the existing setting transportation energy demand represents the amount of transportation energy estimated to be used under existing conditions at the Project Site based on VMT outputs from CalEEMod and vehicle emission factors derived from EMFAC2014.[97] The petroleum-based fuel use summary provided in Table 5-9 for Project construction represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in Appendix M of this SCEA. Project construction would last for up to approximately 26 months; therefore, the net annual average gasoline consumption would be reduced by approximately 27,128 net gallons and diesel consumption would increase by approximately 61,932 net gallons of diesel fuel per year of construction with implementation of PDF AIR-1.

For comparison purposes, the net annual average gasoline and diesel fuel usage during Project construction would not contribute to on-road gasoline-related energy consumption in Los Angeles County and would be approximately 0.01 percent of the 2016 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix M, of this SCEA. As discussed above in Item 5.19, *Utilities and Service Systems*, solid waste reduction programs help to reduce the number of trips to haul solid waste, as well as reducing energy used to process solid waste. The City has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). In compliance with these plans and polices, the Project would implement waste reduction measures, which include reducing construction-related solid waste generation through the recycling of construction and demolition debris and using recycled building materials for new construction.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, appliances, and an emergency generator. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in **Table 5-10**, *Summary of Annual Net New Energy Use During Project Operation*, the Project's net new energy demand would be approximately 2,779,3814 kWh of electricity per year, 5,052,197 cf of natural gas per year, 79,020 gallons of gasoline per year, and 12,811 gallons of diesel fuel per year.

[97] See Appendix M for detailed calculations.

TABLE 5-10
SUMMARY OF ANNUAL NET NEW ENERGY USE DURING PROJECT OPERATION

Energy Type	Annual Quantity
Electricity	
Existing Site	103,303 kWh
Proposed Project:	
Resident High Rise Building/Office Uses/Restaurant//Water/EV Charging/Other	2,882,684 kWh
Total Net Electricity	**2,779,381 kWh**
Natural Gas	
Existing Site	142,813 cf
Proposed Project:	
Resident High Rise Building/Office Uses/Restaurant//Water/EV Charging/Other	5,195,010 cf
Total Net Natural Gas	**5,052,197 cf**
Transportation	
Existing Site:	
Gasoline	57,318 gallons
Diesel	5,626 gallons
Proposed Project:	
Gasoline	136,338 gallons
Diesel	18,438 gallons
Total Net Transportation – Gasoline	**79,020 gallons**
Total Net Transportation – Diesel	**12,811 gallons**

NOTES:
Detailed calculations are provided in Appendix Mof this SCEA.
Project electricity and natural gas estimates assume compliance with applicable 2016 Title 24 and CALGreen requirements.
kWh = kilowatt-hours; cf = cubic feet

SOURCE: ESA, 2018.

Electricity

As shown in Table 5-10, with compliance with 2016 Title 24 standards and applicable 2016 CALGreen requirements, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 2,779,381 kWh per year. Pursuant to CALGreen and PDF GHG-1, the Project would also utilize low-flow kitchen and bathroom faucets, showerheads and toilets; landscaping that would consist of native and drought-tolerant plants, and include energy efficient appliances. The Project would also include building features such as installation of energy-efficient lighting, heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants. In addition, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020 and 60 percent by 2030, in accordance with SB 100 (adopted in September 2018). The current sources procured by LADWP include wind, solar, and geothermal sources, which sources accounted for 29 percent of LADWP's

overall energy mix in 2016, the most recent year for which data are available.[98] This mix represents the available off-site renewable sources of energy that would meet the Project's energy demand.

Based on LADWP's 2016 Power Integrated Resource Plan, LADWP forecasts that its total energy sales in the 2021–2022 fiscal year (the Project's buildout year) will be 26,835 GWh of electricity.[99,100] LADWP's 2016 Power Integrated Resource Plan sets forth a number of recommendations designed to meet the utility's key objectives. One of LADWP's key recommendations and strategies is to provide sufficient generation and requires LADWP to "procure sufficient generation and energy storage to meet long-term capacity requirements."[101] Therefore, the 2021 projected sales would be drawn from the readily available and sufficient energy supplies procured by LADWP, including short-term procurements as needed to meet peak demands.[102] As such, the Project-related net increase in annual electricity consumption of 2,779,381 kWh per year would represent approximately 0.01 percent of LADWP's projected sales in 2021. In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

Natural Gas

As provided in Table 5-10, with compliance with 2016 Title 24 standards and applicable 2016 CALGreen requirements, buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 5,052,197 cf per year. As discussed above, the Project would comply with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and CALGreen). Consistent with regulatory requirements and PDF GHG-1, the Project would also include building features that comply with and exceed CALGreen such as, installation of energy-efficient lighting; installation of energy efficient appliances, installation of insulation in sidewalls and roofs; sealant of potential sources of air leakage to reduce infiltration and exfiltration; and use of heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants.

As stated above, the Project's estimated net increase in demand for natural gas is 5,052,197 cf per year, or approximately 13,842 cf per day. Based on their 2018 California Gas Report, the California Energy and Electric Utilities estimate natural gas capacity within SoCalGas' planning area will be approximately 3,775 million cf per day in 2021 (the Project's buildout year).[103] The Project would account for approximately 0.0004 percent of the 2021 forecasted capacity in SoCalGas' planning area.

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98 California Energy Commission, Utility Annual Power Content Labels for 2016, Los Angeles Department of Water and Power.

99 LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

100 Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, Appendix A, 2016.

101 Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, p. 193. Available at: https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB562207&RevisionSelectionMethod=LatestReleased. Accessed November 2018.

102 Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, p. 193.

103 California Gas and Electric Utilities, *2018 California Gas Report*, 2018, p. 102. Available at: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf. Accessed November 2018.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The Project Site would be developed with a mixed-use high rise building that includes office and residential uses. The Project would also include the reuse of the church building, which would be converted into 12,800 sf of restaurant uses. The Project is located to nearby office uses, services and commercial uses including grocery stores, restaurants, and retail land uses. A majority of the Project's vehicle fleet would consist of light-duty automobiles and light-duty trucks, which are subject to fuel efficiency standards. The Project Site is located approximately 500 feet northwest from the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line, and in proximity to Metro Lines 18, 51, 52, 201, 204, and 351 and the Wilshire Center/Koreatown DASH line. The Project Site's location near multiple public transportation lines would allow Project residents, visitors, and employees to replace single-occupancy vehicle travel with convenient and high-quality public transportation reducing overall transportation fuel demand. The Applicant would include pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs. Annual trips for the Project were estimated using trip rates provided in the Transportation Study (Appendix J).[104]

At buildout, the Project would consume a net increase of 79,020 gallons of gasoline and 12,811 gallons of diesel per year, or a total of 91,831 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.0022 percent of the 2016 annual on-road gasoline- and 0.0022 percent of the 2016 annual on-road diesel-related energy consumption in Los Angeles County.[105] Detailed calculations are shown in in Appendix M of this SCEA.

- ***The effects of the Project on local and regional energy supplies and on requirements for additional capacity.***

Construction

As discussed above, electricity would be intermittently consumed for conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. As discussed above, the Project's estimated net annual average construction electricity usage represents approximately 2.0 percent of the estimated net annual operational demand which, as discussed below, would be within the supply and

[104] Gibson Transportation Consulting, Inc., *Transportation Impact Study for the 550 S. Shatto Place Project*, September 2018.

[105] California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2016, http://www.energy.ca.gov/almanac/transportation_data/gasoline/2016_A15_Results.xlsx. Accessed September 2018. Diesel is adjusted to account for retail (52%) and non-retail (48%) diesel sales.

infrastructure service capabilities of LADWP.[106] As discussed above, since construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas, the Project construction would create no demand for natural gas, and natural gas would not be supplied to support Project construction activities; thus, Project construction would result in a net decrease when compared to the existing setting. As discussed above, transportation fuel usage during Project construction activities would not contribute to gasoline usage and would be 0.01 percent of the diesel usage within Los Angeles County, respectively. As energy consumption during Project construction activities would be relatively low, the Project would not adversely affect regional energy supplies in the years during the construction period. Construction transportation energy would be provided by existing retail service stations and from existing mobile fuel services that are typically needed to deliver fuel to a construction site to refuel the off-road construction equipment at the Project Site and no new facilities would be expected to be required.

Operation

As discussed above, LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.[107] Based on LADWP's 2016 Power Integrated Resource Plan, LADWP forecasts that its total energy sales in the 2021–2022 fiscal year (the Project's buildout year) will be 26,835 GWh of electricity.[108] Based on LADWP's projected sales for the 2021–2022 fiscal year , it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's net increase in annual electricity consumption of 2,779,381 kWh per year, which would represent approximately 0.01 percent of LADWP's projected 2021–2022 fiscal year sales.

As stated above, the Project's estimated net increase in demand for natural gas would be 5,052,197 cf per year, or approximately 13,842 cf per day. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimate natural gas capacity within SoCalGas' planning area will be approximately 3,775 million cf per day in 2021 (the Project's buildout year).[109] The Project's net natural gas demand would represent approximately 0.0004 percent of the 2021 forecasted consumption in SoCalGas' planning area. Therefore, since SoCalGas' projected total capacity would be enough to meet anticipated demand and the project would represent a relatively insubstantial percentage of the capacity, the Project would not require SoCalGas to increase its capacity to the service area.

At buildout, the Project would consume a net increase of 79,020 gallons of gasoline and 12,811 gallons of diesel per year, or a total of 91,831 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.0022 percent of the 2016 annual on-road gasoline- and 0.0022 percent of the

[106] The percentage is derived by taking the net annual amount of electricity usage during construction (56,954 kWh) with implementation of PDF AIR-1 and dividing that number by the total amount of net electricity usage during operation (2,779,381) to arrive at 2.0 percent.

[107] Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, p. 68.

[108] Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, Appendix A, p. A-6.

[109] California Gas and Electric Utilities, *2018 California Gas Report*, 2018, p. 102.

2016 annual on-road diesel-related energy consumption in Los Angeles County.[110] Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption, including the Project's foreseeable transportation energy demand.[111] Detailed calculations are shown in in Appendix M of this SCEA.

In sum, energy consumption during Project operations would be relatively insubstantial and energy requirements are within LADWP's and SoCalGas' service provision and planning efforts. Operational transportation energy would be provided by existing retail service stations and no new retail service stations would be expected to be required.

- ***The effects of the Project on peak and base period demands for electricity and other forms of energy.***

As discussed above, electricity demand during construction and operation of the Project would have a relatively insubstantial effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, the LADWP power system experienced an all-time high peak of 6,432 MW on August 31, 2017.[112] The LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2021–2022, the base case peak demand for the power grid is 5,889 MW.[113] Under peak conditions, the Project would consume a net increase of 2,779,381 kWh on an annual basis, which would be equivalent to 317 to 635 kW (assuming 8,760 hours or 4,380 hours per year of active electricity demand). In comparison to the LADWP power grid base peak load of 5,889 MW for 2021–2022, the Project would represent approximately 0.005 to 0.01 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand on the electrical power grid of 0.5 percent in fiscal year 2021–2022 would be sufficient to account for future electrical demand by the Project.[114] Therefore, Project electricity consumption during operational activities would have a relatively insubstantial effect on peak load conditions of the power grid.

- ***Effects of the Project on Energy Resources***

One of the objectives of SB 350 is to increase procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. In September 2018, SB 100 was adopted, which updated the requirement to 60 percent by 2030. Accordingly, LADWP is required to procure at least 60 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal

[110] California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2016, http://www.energy.ca.gov/almanac/transportation_data/gasoline/2016_A15_Results.xlsx. Accessed September 2018. Diesel is adjusted to account for retail (52%) and non-retail (48%) diesel sales.

[111] BP Global, Oil reserves, 2018, http://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html. Accessed June 2018.

[112] Los Angeles Department of Water and Power, *2017 Retail Electric Sales and Demand Forecast*, 2017, p. 6. Available at: http://ezweb.ladwp.com/Admin/Uploads/Load%20Forecast/2017/10/2017%20Retails%20Sales%20Forecast_Final.pdf.

[113] Los Angeles Department of Water and Power, *2017 Retail Electric Sales and Demand Forecast*, 2017, p. 6.

[114] Los Angeles Department of Water and Power, *2017 Retail Electric Sales and Demand Forecast*, 2017, p. 6.

sources. These sources accounted for 29 percent of LADWP's overall energy mix in 2016, the most recent year for which data are available. This represents the available off-site renewable sources of energy that would meet the Project's energy demand. Prior to the adoption of SB 100, LADWP committed to providing an increasing percentage from renewable sources that exceed the Renewables Portfolio Standard requirements by providing 50 percent by 2025 (5 years before the SB 350 year 2030 requirement), 55 percent by 2030, and 65 percent by 2036 (LADWP is required to update plans to comply with the recently adopted SB 100 requirements). As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP 2016 Power Integrated Resource Plan identifies adequate resources (natural gas, coal) to support future generation capacity.[115]

Natural gas supplied to the Southern California is mainly sourced from out-of-state sources, with a small portion originating in California. Natural gas for the Southern California region is sourced from locations throughout the western United States as well as Canada.[116] According to the U.S. Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2015 consumption.[117] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a relatively insubstantial effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil which is either domestically sourced or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[118] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions, but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operation activities would have a relatively insubstantial effect on the transportation fuel supply.

With regard to on-site renewable energy sources, the Project would also meet the applicable requirements of the Los Angeles Green Building Code and the CALGreen Code, including provisions for building rooftops to be solar-ready that would allow for the future installation of on-site solar photovoltaic or solar water heating systems. However, due to the Project Site's location, it would not be feasible to install other renewable energy sources on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean

[115] Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, p. ES-25. "… the 2016 IRP outlines an aggressive strategy for LADWP accomplish its goals, comply with regulatory mandates, and provide sufficient resources over the next 20 years given the information presently available …"

[116] California Gas and Electric Utilities, *2018 California Gas Report*, 201,8 p. 12.

[117] U.S. Energy Information Administration, How much natural gas does the United States have, and how long will it last? https://www.eia.gov/tools/faqs/faq.php?id=58&t=8. Accessed September 2018.

[118] BP Global, Oil reserves, 2018, http://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html. Accessed September 2018.

wave, and tidal current technologies, or multifuel facilities using renewable fuels. Furthermore, while methane is a renewable derived biogas and was found beneath the Project Site, it is not available on the Project Site in commercially viable quantities or form, and its extraction and treatment for energy purposes would result in secondary impacts. Additionally, wind-powered energy is not a viable energy source on the Project Site due to the lack of sufficient reliable wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[119]

- ***The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.***

SCAG's 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. The Project would be generally consistent with the general land use designation, density, and building intensity outlined in the SCAG 2016 RTP/SCS. Using data collected from local jurisdictions, including General Plans, SCAG categorized existing land uses into "land use types" and then classified sub-regions into one of three land use development categories: urban, compact, or standard. SCAG used each of these three categories to describe the conditions that exist and/or are likely to exist within each specific area of the region.[120] As shown in Exhibit 13 of the SCAG 2016 RTP/SCS, SCAG categorized the area surrounding the Project Site as an urban area generally defined as an area that is directly adjacent to moderate and high density urban centers. The majority of housing units are multifamily and attached single family homes (townhomes) and are supported by high levels of regional transit and local transit, as well as a well-connected street network that results in a highly walkable environment.[121] As discussed in greater detail in Item 5.8, *Greenhouse Gas Emissions*, the Project would incorporate land use characteristics that would minimize Project-related VMT.

As a result, operation of the Project would provide residents, employees, and visitors with alternative transportation options. The Project would also include construction Project Design Features to improve traffic flow and potentially reduce idling times and construction transportation fuel use.

Conclusion:

Based on the above impact analysis, Project related impacts that would result in the wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant. No mitigation measures would be required.

[119] California Energy Commission, Wind Projects and Wind Resource Areas, 2018. Available at: http://www.energy.ca.gov/maps/renewable/wind.html. Accessed September 2018.

[120] Southern California Association of Governments, *2016 RTP/SCS*, April 2016, pp. 20–21. Available at: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx. Accessed September 2018.

[121] Southern California Association of Governments, *2016–2040 RTP/SCS Background Documentation*, April 2016, Exhibit 13, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf. Accessed September 2018.

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

Less Than Significant Impact. As demonstrated in the analysis below, construction and operation of the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The Project would not result in an increase in demand for electricity, natural gas, or transportation energy that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

- ***The degree to which the Project complies with existing energy standards.***

The Project would comply with all applicable federal, State, and local energy standards. Construction equipment would comply with federal and State requirements where applicable. The USEPA and NHSTA have adopted fuel efficiency standards for medium- and heavy-duty trucks. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[122] The USEPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[123] Construction equipment would also comply with CARB regulations limiting heavy-duty truck idling to five consecutive minutes at one location, and the phase-in of off-road emission standards that results in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines.

Electricity and natural gas usage during Project operations presented in Table 5-10 would comply with the applicable 2016 Title 24 standards, applicable 2016 CALGreen requirements, and the Los Angeles Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project Site are assumed to comply with CAFE fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions but would also result in fuel

[122] United States Environmental Protection Agency, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, August 2011, https://nepis.epa.gov/Exe/ZyPDF.cgi/P100BOT1.PDF?Dockey=P100BOT1.PDF. Accessed September 2018.

[123] United States Environmental Protection Agency, *Federal Register* Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, October 25, 2016, https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf. Accessed September 2018.

savings in addition to CAFE standards. Therefore, Project construction and operational activities would comply with existing energy standards with regards to transportation fuel consumption.

- ***The degree to which the Project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.***

The current City of LA Green Building Code requires compliance with the 2016 Title 24 standards and the CALGreen Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code). In compliance with the City's Green Building Code, the Project would incorporate energy efficient appliances, water conservation features such as low flow water fixtures, and water-efficient landscaping techniques by planting native and drought-tolerant plant species.

As discussed above, the City has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Integrated Resources Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986).[124],[125],[126] These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

With implementation of these features along with complying with State and local energy efficiency standards, the Project would meet and/or exceed applicable energy conservation policies and regulations.

- ***Whether the Project conflicts with adopted energy conservation plans.***

The Project would comply with applicable State and local energy conservation plans and policies. As discussed above in Item 5.8, *Greenhouse Gas Emissions*, the Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2016 Title 24 standards and CALGreen Code, which have been incorporated into the City of Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code).

As discussed above in Item 5.8, *Greenhouse Gas Emissions*, the Project would be consistent with regional planning strategies that address energy conservation. SCAG's 2016 RTP/SCS focuses on

[124] City of Los Angeles, *Solid Waste Integrated Resources Plan*, 2014. Available at: https://www.lacitysan.org/san/sandocview?docname=cnt012520. Accessed November 2018.

[125] City of Los Angeles, *RENEW LA Plan*, 2006. Available at: http://clkrep.lacity.org/onlinedocs/2016/16-1235-s1_ORD_184665_12-14-16.pdf. Accessed November 2018.

[126] City of Los Angeles, Exclusive Franchise System Ordinance, 2014. Available at: https://cityclerk.lacity.org/councilagenda/AttachmentViewer.ashx?AttachmentID=38690&ItemID=40266. Accessed November 2018.

creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2016 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, encouraging the reduction of building energy use, and increasing use of renewable sources. As discussed above, the Project's features would serve to reduce the consumption of electricity, natural gas, and transportation fuels. As such, the Project would be substantially consistent with adopted energy conservation plans.

- ***Result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?***

Construction

Electricity

As discussed above, construction activities at the Project Site would require limited and minor quantities of electricity for watering, lighting, power tools and other support equipment. Heavy construction equipment would be powered with diesel fuel.

During Project construction activities, the Project's net annual average electricity usage represents 2.0 percent of the estimated net annual Project operational demand; as described above, LADWP's existing electrical infrastructure currently has sufficient capacity to serve the Project's net operational demand. As compared to the existing setting's electricity demand, the Project's net annual average construction electricity usage would represent approximately 10 percent of the estimated existing operational electricity demand.

With regard to existing electrical distribution lines, the Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements would be minimized. Project contractors would be required to notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. As such, construction of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Existing off-site infrastructure would not have to be expanded and new infrastructure would not be required to provide electrical service to the Project during construction or demolition (see Section 5.19, *Utilities and Service Systems*). Therefore, Project construction would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Natural Gas

As discussed above, construction activities, including the construction of new buildings and hardscape, typically do not involve the consumption of natural gas. Accordingly, natural gas

would not be needed to support Project construction activities, and no natural gas demand would be generated by Project construction. However, Project construction would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that extensive off-site infrastructure improvements would be needed to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to grading/trenching activities in order to place the lines below surface. In addition, prior to ground disturbance, Project contractors would be required to notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and any new service connects required by the Project are not an expansion of existing facilities. As such, construction of the Project is not anticipated to adversely affect the natural gas infrastructure serving the surrounding uses or utility system capacity.

Transportation Energy

As discussed above, construction-related transportation energy, which includes the consumption of gasoline and diesel fuel for off-road equipment, on-road trucks, and worker vehicles, would be provided by existing transportation fuel providers. Transportation fuel during construction would be provided by existing retail service stations and from existing mobile fuel services that are typically needed to deliver fuel to a construction site to refuel the off-road construction equipment at the Project Site. Construction of the Project would not require new or expanded transportation energy infrastructure the construction of which could cause significant environmental effects.

Operations

Electricity

As shown in Table 5-10, the Project's net increase in operational electricity usage would be 2,779,381 kWh per year, which is approximately 0.01 percent of LADWP's projected sales in fiscal year 2021–2022.[127] In addition, during peak conditions, the Project would represent approximately 0.005 to 0.01 percent of the LADWP estimated peak load. The LADWP 2016 Power Integrated Resource Plan identifies adequate resources (natural gas, coal) to support future generation capacity.[128] LADWP's 2016 Power Integrated Resource Plan sets forth a number of recommendations designed to meet the utility's key objectives. One of LADWP's key recommendations and strategies is to provide sufficient generation and requires LADWP to "procure sufficient generation and energy storage to meet long-term capacity requirements."[129] Therefore, the 2021 projected sales would be drawn from the readily available and sufficient energy supplies procured by LADWP, including short-term procurements as needed to meet peak demands.[130] The Project would not create the need for additional off-site infrastructure (i.e.,

[127] Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, Appendix A, Table A-1.

[128] Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, p. ES-25. "… the 2016 IRP outlines an aggressive strategy for LADWP accomplish its goals, comply with regulatory mandates, and provide sufficient resources over the next 20 years given the information presently available …"

[129] Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, p. 193.

[130] Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, p. 193.

substation) (see Section 5.19, *Utilities and Service Systems*). Therefore, during Project operations, it is expected that LADWP's existing infrastructure, planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Natural Gas

As shown in Table 5-10, the Project's operations would consume a net increase of 5,052,197 cf of natural gas per year, which represents approximately 0.0004 percent of the 2021 forecasted capacity in the SoCalGas planning area. SoCalGas expects overall natural gas demand to decline through 2035 accounting for population and economic growth as well as efficiency improvements and the State's transition away from fossil fuel-generated electricity to increased renewable energy. The 2016 California Gas Report states, "SoCalGas projects total gas demand to decline at an annual rate of 0.5 percent per year from 2018 to 2035. The decline in throughput demand is due to modest growth in the natural gas vehicle market and across-the board declines in other market segments."[131] Based on the Project's small fraction of total natural gas capacity for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, it is expected that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's demand for natural gas.

Transportation Energy

The Project's operational demand on transportation fuel supplies would be minimized by future improvements to vehicle fuel economy pursuant to federal and State regulations. By 2025, vehicles are required to achieve 54.5 mpg (based on USEPA measurements), which is a 54 percent increase from the 35.5 mpg standard in the 2012–2016 standards. As discussed previously, the Project would support statewide and local efforts to reduce trips and improve transportation energy efficiency by locating at in infill location in an identified HQTA and TPA that is close to shopping centers and other destinations. The Project would also encourage the use of non-fossil fuel transportation by including pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs. The Project would also install 141 long-term and 17 short-term bicycle parking spaces. Siting land use development projects at infill sites is consistent with the State's overall goals to reduce VMT as outlined in the 2016 RTP/SCS for the region, which seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them."[132]

Conclusion:

As demonstrated in the analysis above, construction and operation of the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant.

[131] California Gas and Electric Utilities, 2018 California Gas Report, p. 4.

[132] Southern California Association of Governments, *2016 RTP/SCS*, April 2016, p. 16.

Cumulative Impacts

Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. There are 116 related projects located within the vicinity of the Project Site. The geographic context for the cumulative impacts analysis regarding electricity is LADWP's service area and the geographic context for the cumulative impacts analysis regarding natural gas is SoCalGas' service area. While the geographic context for transportation-related energy use is more difficult to define, the City has determined to assess the Project's potential cumulative impacts in the context of County-wide consumption. Growth within these geographic areas is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

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

Electricity

Buildout of the Project, related projects, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. As discussed above, LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.[133] LADWP forecasts that its total energy sales in the 2021–2022 fiscal year (the Project buildout year) will be 26,835 GWh of electricity.[134] Based on the Project's estimated net new electrical consumption of 2,779,381 kWh/year, the Project would account for approximately 0.01 percent of LADWP's total projected sales, and thus its supplies, in the Project's buildout year. Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability from non-renewable electricity resources, the use of such resources would be on a relatively small scale, would be reduced by measures making the Project more energy-efficient and by measures requiring LADWP to obtain more of its supplies from renewable resources, and would therefore be included in and consistent with growth expectations for LADWP's service area. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.

Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. As discussed above, based on the 2018 California Gas Report, the CEC estimates natural gas capacity within SoCalGas' planning area will be approximately 3,775 million cf per day in 2021 (the Project's buildout year).[135] The Project would account for approximately 0.0004 percent of

[133] California Gas and Electric Utilities, *2018 California Gas Report*, 2018, p. 102.

[134] Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, Appendix A, Table A-1.

[135] California Gas and Electric Utilities, *2018 California Gas Report*, 2018, p. 102.

the 2021 forecasted consumption in SoCalGas' planning area. SoCalGas forecasts take into account projected population growth and development based on local and regional plans. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be included in and consistent with regional and local growth expectations for SoCalGas' service area. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable, and thus would be less than significant.

Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, at buildout, the Project would consume a total net increase of 79,020 gallons of gasoline and 12,811 gallons of diesel per year, or a total of 91,831 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.0022 percent of the 2016 annual on-road gasoline- and 0.0022 percent of the annual on-road diesel-related energy consumption in Los Angeles County, as shown in Appendix M, of this SCEA.

Additionally, as described above, petroleum currently accounts for 90 percent of California's transportation energy sources; however, over the last decade the State has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and support land use decisions that support the use of transit and other non-vehicular modes of transportation that reduce VMT, all of which would reduce reliance on petroleum fuels.

As discussed previously, the Project Site is located in an identified HQTA and a TPA in an urban area that is supported by regional and local transit services that would encourage alternative modes of transportation and a reduction in overall VMT. The Project Site would be located approximately 500 feet from the Wilshire/Vermont Metro Rail Station, as well as multiple bus routes. The Project's design would also encourage the use of non-fossil fuel transportation by including pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs. The Project would also install 141 long-term and 17 short-term bicycle parking spaces. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions consistent with applicable provisions of the SCAG 2016 RTP/SCS for the land use type.

Conclusion:

Based on the analysis provided above, the Project's contribution to cumulative impacts related to energy consumption (i.e., electricity, natural gas, and transportation energy) would not result in a cumulatively considerable effect related to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation.

As such, the Project's impacts would not be cumulatively considerable; therefore, cumulative energy impacts are concluded to be less than significant.

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

Less Than Significant Impact. Based on the analysis provided below, the Project's contribution to cumulative impacts related to energy consumption (i.e., electricity, natural gas, transportation energy) would not result in a cumulatively considerable effect related to available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Electricity

As with the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including anti-idling construction vehicle regulations, the 2016 Title 24 standards and CALGreen code, the City of Los Angeles Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code), and incorporate mitigation measures, as necessary. In addition, electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As stated in LADWP's 2016 Power Integrated Resource Plan, LADWP will continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The Power Integrated Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements.[136] Like the Project, development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet their respective needs. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. As such, the Project's contribution to cumulative impacts with respect to electricity plans as well as infrastructure would not be cumulatively considerable and, thus, would result in a less-than-significant cumulative impact.

Natural Gas

As with the Project, future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including the 2016 Title 24 standards and CALGreen code, the City of Los Angeles Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code), and incorporate mitigation measures, as necessary. In addition, natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements

[136] Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, 2016, Appendix A, p. ES-2.

by SoCalGas occur as needed.[137] It is expected that SoCalGas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area, including the Project and related projects also served by the existing SoCalGas infrastructure, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. As such, the Project's contribution to cumulative impacts with respect to natural gas plans as well as infrastructure would not be cumulatively considerable and, thus, would result in a less-than-significant cumulative impact.

Transportation Energy

Like the Project, construction of development projects in Los Angeles County would also generate short-term and temporary demands for construction-related transportation energy, including demands for gasoline and diesel fuel for off-road equipment, on-road trucks, and worker vehicles. Construction transportation energy demands would cease at the completion of construction.

As discussed previously, the Project Site is located in an identified HQTA and a TPA in an urban area that is supported by regional and local transit services that would encourage alternative modes of transportation and a reduction in overall VMT. The Project Site would be located approximately 500 feet from the Wilshire/Vermont Metro Rail Station, as well as multiple bus routes. The Project would support statewide efforts to improve transportation energy efficiency by locating at in infill location close to shopping centers and other destinations. Siting land use development projects at infill sites is consistent with the State's overall goals to reduce VMT as outline in the 2016 RTP/SCS for the region, which seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them."[138] As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions consistent with applicable provisions of the SCAG 2016 RTP/SCS for the land use type. In addition, like the Project, operations of developments projects in Los Angeles County would generate varying numbers of trips to and from the developments based on the size, land use type, and location of the developments. The Project's and future projects' effect on transportation energy demand would be minimized by future improvements to vehicle fuel economy pursuant to federal and State regulations. By 2025, vehicles are required to achieve 54.5 mpg (based on USEPA measurements), which is a 54 percent increase from the 35.5 mpg standard in the 2012–2016 standards.[139]

The related projects would also need to demonstrate consistency with these goals and incorporate project design features or mitigation measures as required under CEQA, which would also ensure that the related projects would not conflict with applicable transportation energy efficiency plans. Therefore, as the Project and the related projects would incorporate land use characteristics consistent with State and regional goals for reducing VMT, or implement mitigation measures

[137] Southern California Gas Company, History of SoCalGas, 2018, Available at: https://www.socalgas.com/company-history. Accessed November 2018.

[138] Southern California Association of Governments, *2016 RTP/SCS*, April 2016, p. 16.

[139] USEPA, Corporate Average Fuel Economy (CAFE) Standards, 2012. Available at: https://www.gpo.gov/fdsys/pkg/FR-2012-10-15/pdf/2012-21972.pdf. Accessed November 2018.

under CEQA to achieve the same results, the Project and related projects would not have a cumulatively considerable impact related to transportation energy plans as well as the consumption of fuel or an increase in demand resulting in a need for new infrastructure, and would not result in a cumulatively considerable contribution to a significant impact on energy.

Conclusion:

The Project and related projects would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant. No mitigation measures are required.

5.7 Geology and Soils

The following discussion of Geology and Soils is based, in part, on the technical report for the Project, entitled the Environmental Impact Report, Soils and Geology Issues, Proposed Mixed Use Development, 3119 West 6th Street, Los Angeles, California prepared by Geotechnologies Incorporated, updated August 3, 2018. The Geotechnical Report was based on a preliminary geotechnical investigation conducted at the Project Site in 2018, which was used to determine the nature, distribution, and engineering properties of the earth materials underlying the Project Site and evaluate those properties with respect to the design and construction of the Project. The Geotechnical Report is attached hereto as Appendix E. The following discussion of paleontological resources is based on the Paleontological Resources Assessment Report prepared by ESA in December 2018.

Would the project:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:

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

Less Than Significant Impact. Fault rupture refers to the ground displacement along the surface trace of a fault that occurs during an earthquake.[140] The California Geological Survey (CGS) has established earthquake fault zones, known as Alquist-Priolo Earthquake Fault Zones, around the surface traces of active faults to assist cities and counties in their planning, zoning, and building regulation functions.[141,142] These zones identify areas where there is a potential for surface fault rupture to occur along an active fault that could prove hazardous to habitable structures. In addition, the City of Los Angeles General Plan Safety Element has designated fault rupture study

[140] Geotechnical Reports prepared by Geotechnologies Incorporated, dated and July 20, 2018.

[141] https://www.conservation.ca.gov/cgs/alquist-priolo. Accessed November 25, 2018.

[142] https://www.conservation.ca.gov/cgs/earthquake-data. Accessed November 25, 2018.

areas extending along each side of active and potentially active faults to establish areas of hazard potential due to fault rupture.[143]

The Geotechnical Report notes that no currently known active or potentially active surface faults traverse the Project Site and that the Project Site is not located within a currently designated Alquist-Priolo Earthquake Fault Zone. The nearest active fault to the site is the Hollywood fault located approximately 3.1 miles to the north.[144] As a result, there are no active or potentially active faults close enough to the Project Site to produce fault rupture or surface displacement at the Project Site. The Project would not contain uses or activities that would exacerbate the activity of a known earthquake fault.[145]

Conclusion:

The Project would not directly or indirectly cause potential substantial impacts from fault rupture that could potentially cause direct or indirect adverse effects. Impact are less than significant and no mitigation measures are required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. A significant impact would occur if the Project would exacerbate the risk of personal injury or death or property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Seismic activities have been associated with a number of nearby faults (e.g., Hollywood, Raymond, Verdugo, Newport-Inglewood, Santa Monica, Malibu Coast, and Palos Verdes Hills Faults). Although the Project Site is located within the seismically active Southern California region, it is not exposed to a seismic risk greater than other properties in the City. The level of ground shaking that would be experienced at the Project Site from active or potentially active faults, or blind thrust faults, in the region would be a function of several factors, including earthquake magnitude, type of faulting, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology.

While it is likely that future earthquakes produced in Southern California would shake the Project Site, modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels and other forms of building reinforcement. As with any new project development in the State of California, building design and construction are required to conform to the current seismic design provisions of the City's Building Code,[146] which incorporates relevant provisions of the 2016 California Building Code (CBC).

The 2016 edition of the CBC is based on the 2015 International Building Code (IBC) published by the International Code Council, which replaced the Uniform Building Code. The 2016 CBC contains California amendments based on the American Society of Civil Engineers (ASCE)

[143] https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf.Accessed November 21, 2018.

[144] Geotechnologies, Incorporated, *Environmental Impact Report, Soils and Geology Issues, Proposed Mixed Use Development, 3119 West 6th Street, Los Angeles, California*, August 3, 2018.

[146] LADBS https://www.ladbs.org/forms-publications/2017-code-documents.

Minimum Design Standard ASCE/SEI 7-16, Minimum Design Loads for Buildings and Other Structures, provides requirements for general structural design and includes means for determining earthquake loads as well as other loads (such as wind loads) for inclusion into building codes. Seismic design provisions of the building code generally prescribe minimum lateral forces applied statically to the structure, combined with the gravity forces of the dead and live loads of the structure, which the structure then must be designed to withstand. The prescribed lateral forces are generally smaller than the actual peak forces that would be associated with a major earthquake. Consequently, structures should be able to: (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural damage but with some nonstructural damage, and (3) resist major earthquakes without collapse, but with some structural as well as nonstructural damage.[147]

The 2016 CBC, as amended by the City's Building Code, incorporates the latest seismic design standards for structural loads and materials to provide for the latest in earthquake safety. Compliance with requirements would reduce seismic ground shaking impacts to the maximum extent practicable under current engineering practices. The Project would not contain uses or activities that would exacerbate the risks from existing environmental conditions.

Conclusion:

The Project would not directly or indirectly cause potential substantial impacts related to strong seismic ground shaking. Impacts would be less than significant, and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. This fluid-like state can result in horizontal and vertical movements of soils and building foundations from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction occurs when three general conditions exist: (1) shallow groundwater; (2) low density non-cohesive (granular) soils; and (3) high-intensity ground motion.[148]

The State of California has prepared Seismic Hazard Zone Reports to regionally map areas where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacement. The maps may not identify all areas that have potential for liquefaction, strong ground shaking, and other earthquake and geologic hazards. The Seismic Hazards Map of the State of California (CDMG 1999) does not classify the Project Site as part of the potentially "Liquefiable" area. This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial

[147] 2016 California Building Code, Part 2, Volume 2, Section 1613, https://codes.iccsafe.org/content/chapter/1832/?site_type=public. Accessed November 20, 2018.

[148] Recommended Criteria for Delineating Seismic Hazard Zones in California. https://www.conservation.ca.gov/cgs/Documents/Publications/SP_118.pdf Accessed November 20, 2018.

earthquake.[149] The Project Site is not in a liquefaction area as identified in the City of Los Angeles General Plan Safety Element.[150]

As concluded in the Geotechnical Report prepared for the Project, based upon the proposed depth of the excavation to approximately 60 feet, the potential for liquefaction at the Project Site is considered low. The Project would not contain uses or activities that would exacerbate existing environmental conditions.

Conclusion:

The Project would not directly or indirectly cause potential substantial impacts related to ground failure or liquification. Impacts would be less than significant, and no mitigation measures are required.

iv. Landslides?

No Impact. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The Project Site is relatively flat with little topography that could create the likelihood of landslides or earthquake-induced landslides. As shown in the State's Landslide Inventory, shown in the Seismic Hazard Zone Report for the Hollywood Quadrangle, the Project Site is not located within a landslide inventory area.[151] Further, the Project Site is not located within an area of historically earthquake-induced landslides identified on the Earthquake-Induced Landslides Zones map prepared City of Los Angeles.[152] The Project would not contain uses or activities that would exacerbate existing environmental conditions.

Conclusion:

The Project would not directly or indirectly cause potential substantial impacts related to landslides. No impact would occur and no mitigation is required.

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

Less Than Significant Impact. The Project Site is currently developed with school-related classroom and storage buildings, and a paved surface parking lot. There are limited areas of landscaping within the Project Site. Project construction would involve ground-disturbing activities (e.g., excavation, grading, and foundation construction) that would expose soils for a limited time, and allow for possible erosion.

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149 Geotechnologies, Incorporated, *Environmental Impact Report, Soils and Geology Issues, Proposed Mixed Use Development, 3119 West 6th Street, Los Angeles, California*, August 3, 2018.

150 City of Los Angeles Safety Element/ https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf. Accessed November 20, 2018

151 California Department of Conservation, Division of Mines and Geology, Seismic Hazard Zone Map for the Hollywood Quadrangle, Los Angeles County, California March 25, 1999.

152 City of Los Angeles, Bureau of Engineering, Department of Public Works, Navigate LA website: http://navigatela.lacity.org/common/mapgallery/pdf/geotechnical/landslide.pdf Earthquake-Induced Landslides Zones Map. September 2006, Accessed August 2018.

However, the potential for erosion would be reduced by implementation of required regulatory erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion. In addition, on-site grading and site preparation would be required to comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which address grading, excavations, and fills. This LAMC section requires that all grading activities occur in accordance with grading permits issued by LADBS. The permits typically require that excavation and grading activities be scheduled during dry weather periods. Should grading activities occur during the rainy season (October 1st to April 14th), a Wet Weather Erosion Control Plan (WWECP) must be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works.[153] The WWECP would include measures such as diversion dikes to channel runoff around the Project Site. Division 70 of the LAMC also requires that stockpiles, excavated, and exposed soil be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. A deputy grading inspector is required to be on-site during grading operations to ensure adhered to applicable regulations. Lastly, as Project construction would require greater than 1 acre of ground-disturbing activities, the Applicant would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) permit.[154] The SWPPP incorporates best-management practices (BMPs) in accordance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities, to control erosion and to protect the quality of surface water runoff during the Project's construction period.[155]

Following the completion of construction, the potential for erosion would be relatively low due to the fact that the Project Site would be largely impervious and include drainage control features. The use of hardscape and landscape plantings would act as an effective barrier to soil erosion by impeding direct contact between precipitation/irrigation and on-site soils.

With conformance with applicable regulations, including implementation of an erosion control plan as part of a SWPPP, and required drainage control features, impacts regarding wind or waterborne erosion during construction and operation of the Project would be less than significant.

Conclusion:

The Project would not directly or indirectly cause potential substantial impacts related to soil erosion or the loss of topsoil. Impacts would be less than significant and no mitigation is required.

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153 https://bca.lacity.org/uploads/safety/WWEC%20Manual%20for%20website%202009.pdf. Accessed November 25, 2018.

154 United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Permits. https://www.epa.gov/npdes/npdes-permit-basics. Accessed November 21, 2018

155 City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities. http://www.lastormwater.org/wp-content/files_mf/parta.pdf Accessed November 19, 2018.

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. Impacts related to liquefaction and landslides are addressed above under Items 5.7.a.iii and 5.7.a.iv, respectively. As indicated above, the Project Site is not located within a liquefaction hazards zone on the State of California Hazard Zone Map of the Hollywood Quadrangle.[156] Lateral spreading results from earthquake-induced liquefaction, causing landslides associated with gentle slopes that flow laterally, like water.[157] Therefore, considering the relatively flat topography and low potential for liquefaction at the Project Site, the potential for lateral spreading at the Project Site would also be low. Land subsidence occurs when large amounts of groundwater have been withdrawn from certain types of sediments, causing the land to subside. When the water is withdrawn the sediments collapse in on themselves.[158] Based upon the criteria set forth by the City's *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury.[159] For the purpose of this specific issue, a significant impact may occur if the Project were to be built in an unstable area without proper Site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property.

Since the Project Site is not located in a liquefaction zone and does not contain drainage channels or streams, and since the Project would be founded on underlying bedrock material, the risk that development of the Project would cause or accelerate lateral spreading, landslides, subsidence, liquefaction, or collapse is low.[160] Furthermore, all unconsolidated fill materials currently at the Project Site would be removed or compacted, as required by the City of Los Angeles Uniform Building Code standards. The Project would not contain uses or activities that would exacerbate existing environmental conditions.

Conclusion: The Project would not directly or indirectly cause potential substantial impacts related to lateral spreading, landslides, subsidence, liquefaction, or collapse. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying.

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156 Geotechnologies, Incorporated, *Environmental Impact Report, Soils and Geology Issues, Proposed Mixed Use Development, 3119 West 6th Street, Los Angeles, California*, August 3, 2018.

157 U.S. Geological Survey (USGS). About Liquefaction. https://geomaps.wr.usgs.gov/sfgeo/liquefaction/aboutliq.html.

158 U.S. Geological Survey (USGS) Land Subsidence. https://water.usgs.gov/edu/earthgwlandsubside.html.

159 *L*.A. CEQA Thresholds Guide, Chapter E.1, page E.1-4, 2006.

160 Geotechnologies, Incorporated, *Environmental Impact Report, Soils and Geology Issues, Proposed Mixed Use Development, 3119 West 6th Street, Los Angeles, California*, August 3, 2018.

Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or concrete slabs to support on grade. As stated in the Geotechnical Report, the onsite subsurface materials are generally granular and expected to have a low to moderate potential for expansion. Regardless, the Project would be required to adhere to applicable provisions of the City's Building Code, which would address any potential for expansion. The Project would not contain uses or activities that would exacerbate existing environmental conditions.

Conclusion:

Impacts related to substantial risk to life or property that could potential cause direct or indirect adverse effects as a result of expansive soils would be less than significant and no mitigation is required.

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

No Impact. The Project Site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The Project would connect to existing sewer lines that serve the Project Site and would not use septic tanks or alternative waste disposal systems.

Conclusion:

No impact that could potentially cause direct or indirect adverse effects would occur and no mitigation is required.

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

Less Than Significant with Mitigation Incorporated. The analysis of paleontological resources is based on a review of the geotechnical report and a paleontological records search that was commissioned through the Natural History Museum of Los Angeles County (NHMLAC) on April 20, 2018.

The database search results indicated that no known resources exist within the Project Site; however, a number of vertebrate fossils from Older Quaternary Alluvium and the Modelo/Puente Formation deposits have been discovered in Los Angeles in sedimentary deposits similar to those present at the Project Site. Three resources (LACM 3250, 6024, and 5845) from the Older Quaternary Alluvium deposits have been found approximately 1 to 1.3 miles away from the Project Site that have yielded specimens of mammoth (Mammuthus) and mastodon (Mammutidae) between 5 feet to 65 feet below ground surface (bgs). Two other localities (LACM 6202 and 6203) from the Modelo/Puente Formation were found approximately 0.15 miles southwest of the Project Site that have yielded dozens of marine fossils between 60 and 80 feet bgs.

The geologic units within the Project Site were assigned paleontological sensitivity rankings based on the Society for Vertebrate Paleontology guidelines. The fill present within the Project Site has no paleontological sensitivity. Both the Older Quaternary Alluvium and Modelo/Puente Formation present within the Project Site have high paleontological sensitivity.

While no paleontological resources were identified within the Project Site based on the paleontological records search the local findings discussed above indicate that Project-related excavation below 5 feet bgs has the potential to encounter geologic units with high paleontological sensitivity (Pleistocene-age Older Quaternary alluvium and late Miocene-age Modelo/Puente Formation). Older Quaternary alluvium is known to be present within the Project Site at depths of approximately 5 to 30 feet bgs. The Modelo/Puente Formation is known to be present within the Project Site at depths of approximately 30 to 67 feet bgs. Since Project-related excavation is expected to extend to approximately 60 feet below existing surface, it could encounter paleontological resources below 5 feet and result in a potentially significant impact to paleontological resources.

Pursuant to CEQA and specifically SCAG MM-CUL-1(b), which applies to paleontological resources and requires that the projects potential for excavation in parent material (geological formations) with a moderate to high potential for unique paleontological resources be studied. If the project is in an area of high potential for paleontological resources, then retention of a paleontologist for monitoring during subsurface operations is required along with other specifications for protection and recovery of those paleontological resources. The paleontological study completed for this project, and described above, satisfies these requirements and provides Project specific mitigation as a result of the sensitivity analysis. SCAG 2016-2040 RTP/SCS Mitigation Measure MM-CUL-2(b), and mitigation measure MM GEO-1 would ensure that potentially significant impacts to paleontological resources are reduced to a less than significant level.

As a result, Mitigation Measure GEO-1 is identified to ensure that potentially significant impacts that could potentially cause direct or indirect adverse effects to previously unknown paleontological resources that are unexpectedly discovered during Project construction are reduced to a less than significant level.

Mitigation Measures

MM GEO-1:

Retention of a Qualified Paleontologist. A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of excavation and grading during construction, recovery of fossil materials, and reporting as related to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the site in the event potential paleontological resources are encountered.

Construction Worker Paleontological Resources Sensitivity Training. The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources likely to be encountered within the Project Site and the procedures to be followed if they are found.

Paleontological Resources Monitoring and Plan. Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use the qualified paleontologist to oversee the implementation of the PRMP. Full-time paleontological resources monitoring shall be conducted for all ground-disturbing activities that exceed 5 feet in depth. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP) under the direction of the Qualified Paleontologist. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified Paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort

If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 25-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be salvaged following the standards of the SVP (SVP, 2010) and curated with a certified repository.

Conclusion:

Impacts would be reduced to less than significant with incorporation of MM GEO-1.

Cumulative Impacts: Geology and Soils

Impacts associated with geologic and soil issues are typically confined to individual project sites or within a very localized area because of site-specific conditions. Related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to seismic hazards. The Los Angeles Building Code would require consideration of seismic design for all related projects. Related projects would be required to implement LAMC regulations for grading and excavations during construction, including SWPPP and LID requirements. In addition, the related project sites are located in a highly urbanized area and would connect to existing wastewater infrastructure. Thus, the related projects would not need to use septic tanks or alternative waste disposal systems.

The Project Site is not located within a State-designated hazard zone for earthquake induced liquefaction or landslides. The Project and related projects would be required to comply with guidelines and building code regulations pertaining to seismic hazards and with approved geotechnical recommendations, risks associated with seismic rupture, lateral spreading, subsidence, liquefaction, or collapse would also be less than significant. The Project and related projects would comply with LAMC Regulations related to excavation and grading and would not require the need for septic tanks or alternative waste disposal systems.

Many of the related projects would require excavation that could potentially expose or damage potential paleontological resources. However, the related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures would be identified for those related projects that have the potential to cause significant impacts to undiscovered paleontological resources. Implementation of such mitigation measures for the related projects would avoid significant impacts paleontological resources and human remains.

As discussed previously, the identified mitigation measure MM GEO-1, would ensure the Project would not cause a significant impact on a unique paleontological resource. Thus, the Project's contribution to cumulative impacts would not be cumulatively considerable.

Conclusion:

The Project's contribution to cumulative geology and soils impacts would be less than significant and would not be cumulatively considerable. No mitigation is required.

5.8 Greenhouse Gas Emissions

Details of the GHG analysis are provided in the Greenhouse Gas Greenhouse Emission Worksheets which is attached as Appendix F.

Would the project:

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

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

Less Than Significant Impact. State CEQA Guidelines Section 15064.4 was adopted as part of the amendments to the State CEQA Guidelines that are intended to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with developing practice, this section of the State CEQA Guidelines urges lead agencies to quantify the GHG emissions of projects where possible. In addition to quantification, this section also recommends considering qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; 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). Neither CEQA nor the State CEQA Guidelines establishes a threshold of significance; rather, State CEQA Guidelines Section 15064.4 confirms that lead agencies have the discretion to determine the significance of GHG emissions. Such discretion extends to establishing significance thresholds for their respective jurisdictions, including looking 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 State CEQA Guidelines Section 15064.7(c)).

When the amendments to the State CEQA Guidelines relating to assessing the significance of GHG emissions were adopted, the California Natural Resources Agency clarified that the State CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see State CEQA Guidelines Section 15064(h)(3)).[161]

Although a project's GHG emissions can be quantified, neither CARB, nor the SCAQMD, nor the City has adopted quantitative project-level significance thresholds for GHG emissions that would apply to the Project. In 2008, the Governor's Office of Planning and Research (OPR) released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, which states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."[162] Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less-than-significant level as a means to avoid or substantially reduce the cumulative impact of a project."[163]

Per State CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not to be cumulatively considerable if the project would 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.[164] 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.[165] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan,

[161] See generally California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action*, December 2009, pages 11-13, 14, 16; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009, https://www.opr.ca.gov/docs/Transmittal_Letter.pdf. Accessed September 2018.

[162] Governor's Office of Planning and Research, *Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, 2008.

[163] Governor's Office of Planning and Research, *Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, 2008.

[164] California Code of Regulations (CCR), Title 14, Section 15064(h)(3).

[165] California Code of Regulations (CCR), Title 14, Section 15064(h)(3).

integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."[166]

Thus, State CEQA Guidelines Section 15064(h)(3) allows a lead agency to reach a less-than-significant conclusion for GHG emissions if the project complies with a program and/or other regulatory scheme to reduce GHG emissions.

In the absence of any adopted, quantitative threshold, the City of Los Angeles, the lead agency, has determined that the Project's net GHG emissions would not have a significant effect on the environment if the Project would not conflict with the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures contained within CARB's Climate Change Scoping Plan, SCAG's 2016 RTP/SCS, and the City's LA Green Plan, Sustainable City pLAn, and Green Building Code.

Greenhouse Gases

State-regulated greenhouse gases (GHGs) include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). CO_2 is the most abundant GHG in the atmosphere. Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified in their equivalent mass of CO_2, denoted as CO_2e. These GHG emissions are calculated by converting the pollutant-specific emissions to CO_2e emissions by applying the proper global warming potential (GWP) value. These GWP values are available from the United Nations Intergovernmental Panel on Climate Change (IPCC) and are published in the *Fourth Assessment Report* (AR4).[167] By applying the GWP values, project related CO_2e emissions can be tabulated in metric tons (MT) per year.

CEQA Streamlining and Net Project GHG Emissions

Section 21159.28 was one of the sections that SB 375, enacted in 2008, added to the PRC. Section 21159.28 provides that residential and mixed-use projects that meet certain criteria are eligible for CEQA streamlining, provided that CARB has accepted the Metropolitan Planning Organization's determination that the project area's SCS achieves the GHG emission reduction targets established by CARB for the region. PRC Section 21159.28 establishes the following eligibility criteria for CEQA streamlining:

- The project must be either a residential or mixed-use residential project where at least 75 percent of the total building square footage of the project consists of residential use, or a project that is a Transit Priority Project (TPP) as defined in Section 21155.
- The project must be consistent with the use designation, density, building intensity, and applicable policies specified for the project area in a CARB-accepted SCS.

[166] California Code of Regulations (CCR), Title 14, Section 15064(h)(3).

[167] Intergovernmental Panel on Climate Change Fourth Assessment Report: The Physical Science Basis, Summary for Policy Makers, (2007), Available at: https://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4_wg1_full_report.pdf. Accessed September 2018.

- The project must incorporate the mitigation measures required by an applicable prior environmental document.

In cases where all of the criteria are met, PRC Section 21159.28 provides that no environmental analysis is required of: (1) project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network or (2) growth-inducing impacts. As discussed in Section 3, *SCEA Criteria and Transit Priority Project Consistency Analysis*, since the Project meets the Section 21159.28 criteria for CEQA Streamlining benefits, no analysis of GHG emission impacts resulting from passenger cars and light-duty trucks are not required (see Section 3, *SCEA Criteria and Transit Priority Project Consistency Analysis*, of this SCEA for the detailed analysis demonstrating that the Project meets the requirements of SB 375).

For the purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions, occurring both on- and off- the Project Site, resulting from Project-related incremental (net) increase in the use of on-road mobile vehicles (excluding passenger cars and light-duty trucks), electricity, natural gas, stationary sources, wastewater and solid waste generation compared to existing conditions. CEQA Guidelines Section 15126.2 requires a lead agency to assess the impact of a proposed project by evaluating "changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced." Consistent with CEQA Guidelines Section 15126.2, the Project's GHG emissions are assessed by considering the changes to the existing setting as of the time the environmental analysis commenced. The SCAQMD's *Draft Guidance Document* uses the term "incremental" throughout, which has the same meaning as a Project's "net" change in GHG emissions.[168] Therefore, it is clear that the analysis of the Project's net GHG emissions is an appropriate comparison metric, supported by substantial evidence, and consistent with CEQA Guidelines Section 15126.2.

This analysis includes Project construction activities such as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, solid waste handling, and an emergency generator. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis. In order to report total GHG emissions using the CO_2e metric, the GWP ratios corresponding to the global warming potential of CO_2 over a 100-year period is used in this analysis.

Project Design Features

The following GHG-reducing Project Design Feature (PDF) would be incorporated into the Project. As described in Section 3, SCEA Criteria and Transit Priority Project Consistency Analysis, Table 3-3, *Project Consistency with the SCAG 2016-2040 RTP/SCS Mitigation Measures*, the Project PDF includes applicable and relevant GHG mitigation measures contained

[168] South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, Appendix E, p. 2-6, (2008). Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2. Accessed September 2018.

in the 2016 RTP/SCS PEIR (such as SCAG 2016-2040 RTP/SCS Mitigation Measure MM-GHG-3(b)), to minimize potential impacts from GHG emissions. The PDF listed below is incorporated into the Project's design itself and includes a list of specific baseline development features that will be implemented by the Project Applicant and agreed to by the City. The Project Applicant is committed to implementation of the PDF within the Project's design and the City will take appropriate steps to enforce and verify compliance with the commitments.

PDF GHG-1:

- The Project shall use energy efficient appliances;
- The Project shall use low-flow plumbing fixtures;
- The Project shall install 141 long-term and 17 short term bicycle parking spaces;
- The Project shall utilize drought-tolerant plants in its landscaping;
- The Project shall install pre-wiring for EV charging spaces for 20 percent of its parking capacity for future use and;
- Of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity will include installed chargers for immediate use by electric vehicles (EV).

Construction Emissions

Construction of the project would generate 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. Construction emissions are estimated based on conservative assumptions regarding construction activities (e.g., assuming all construction occurs at the earliest feasible date, and that all construction equipment required for a particular construction phase is operating concurrently) and applying the mobile source emissions factors. The emissions estimated from the CalEEMod (Version 2016.3.2) software are based on outputs from the OFFROAD and EMFAC models, which are emissions estimation models developed by the CARB used to calculate emissions from construction activities, including on- and off-road vehicles and equipment. The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions as were used in the criteria pollutant analysis (see Item 5.3, *Air Quality*) to generate GHG emissions values for each construction year where CalEEMod outputs construction-related GHG emissions of CO_2, CH_4, N_2O, and CO_2e. These values are reported in units of metric tons for consistency with general State, federal, and global GHG emission inventories. The CO_2e emissions are calculated for the construction period and future Project build-out conditions in order to estimate the net change in GHG emissions from Project construction and operation as compared to the existing setting. Emissions of GHGs from construction activities occur over a relatively short-term period of time and contribute a relatively small portion of the overall lifetime project GHG emissions. Therefore, SCAQMD staff recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational

GHG reduction strategies.[169] In order to consider Project construction GHG emission in the larger operational context, GHG emissions from construction have been amortized over a 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions) consistent with SCAQMD recommendations.

Operational Emissions

Using CalEEMod, the operational emissions of the existing site uses and of the Project's uses were estimated in order to determine the net incremental change in GHG emissions attributable to the Project. The existing site uses were modeled using historical energy factors based on previous Title 24 standards.[170] The existing project site does not include any fireplaces or hearths; therefore, the existing project site would not result in fireplace emissions. In addition, emissions calculations for the existing site did not include credits or reductions for GHG-reducing measures that are required by regulation, such as reductions in energy and water demand from the 2016 Title 24 standards and the California Green Building Standards (CALGreen) Code, as GHG emissions related to existing site operations were calculated based on complying with the minimum performance level required under previous Title 24 standards. Mobile source emissions (excluding passenger cars and light-duty trucks) are based on the medium-duty and heavy-duty vehicle emission factors from EMFAC, which accounts for Air Basin-specific vehicle fleet characteristics such as the range of vehicle model years and vehicle fuels, and the trip length values for the existing and Project land uses in CalEEMod, which are South Coast Air Basin-wide average trip distance values. To estimate the total VMT generated by existing site and Project trips, trip generation rates provided in the Project's transportation study were used.[171] The trips take into account trip reductions from internal capture from co-locating different land uses on the Project Site and from nearby access to public transportation. The Project Site is located in close proximity to the Wilshire/Vermont Metro Rail Station and Metro bus routes.

With regard to energy usage, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Future fuel consumption rates were estimated based on the specific square footages of the existing land uses and of the Project's land uses (refer to Section 2, *Project Description*, Table 1, *Project Summary*), and based on their respective estimated water supply needs taking into account their respective Title 24 Building Standards Code. Energy usage (off-site electricity generation and on-site natural gas consumption) for the Project was calculated within CalEEMod using the California Energy Commission (CEC) California Commercial End Use Survey (CEUS) data set for nonresidential uses, which lists energy demand by building type.[172] Since the data from the CEUS is from 2002, the emissions modeling using the CalEEMod software incorporates correction factors to account for compliance with the 2016 Title 24 Building Standards Code. This assessment also includes electricity-related

[169] South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, p. 3-8, (2008).

[170] Historical energy factors are based on the 2005 Title 24 standards which were in effect when CARB developed its Scoping Plan 2020 No Action Taken predictions. California Air Pollution Control Officers Association, CalEEMod™ version 2016.3.2 User's Guide, October 2017.

[171] Gibson Transportation Consulting, Inc., Transportation Impact Study for the 550 S. Shatto Place Project (2018).

[172] California Energy Commission, California Commercial End-Use Survey, http://capabilities.itron.com/CeusWeb/Chart.aspx. Accessed September 2018.

GHG emissions from the Project's proposed parking structure, which includes elevators, lighting, and a ventilation system. The parking structure was modeled as fully enclosed. The energy use from residential land uses was calculated based on the CEC Residential Appliance Saturation Survey (RASS) from 2009, which also incorporates correction factors to account for compliance with the 2016 Title 24 Building Standards Code.[173] The existing site uses were modeled using historical energy factors based on previous Title 24 standards.

Energy is required to supply, distribute and treat water needed for and wastewater generated from the existing site and the Project. The CalEEMod software uses the electrical intensity factors from the 2006 CEC report *Refining Estimates of Water-Related Energy Use in California*.[174] The emissions of GHGs associated with the wastewater treatment process emissions were also calculated using the CalEEMod software as described in the *California Emissions Estimator Model User's Guide, Appendix A*.[175]

Emissions from solid waste handling related to the existing site and the Project were also accounted for in the GHG emissions inventory. The GHG emission factors, particularly for CH_4, are based on the default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery).

Stationary source GHG emissions were estimated for the new emergency generator expected in the residential high-rise building, rated at approximately 1,200 kilowatts (1,609 horsepower) based on preliminary engineering assumptions. The emergency generator would result in emissions during maintenance and testing operations. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. The emergency generator's GHG emissions were calculated based on compliance with the mandated emission limits and operating hour constraints of SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines). Pursuant to Rule 1470, maintenance and testing would not occur daily, but rather periodically, up to 50 hours per year.

Other sources of GHG emissions from operation of the existing site uses and the Project's uses include GHG emissions from the equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment GHG emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)*.[176] The CalEEMod software conservatively estimates that landscaping equipment would operate for 250 days per year in the South Coast Air Basin; this assumption was used for both the existing site uses and the Project.

[173] California Energy Commission, Residential Appliance Saturation Study (2009), https://www.energy.ca.gov/appliances/rass/.

[174] California Energy Commission, Refining Estimates of Water-Related Energy Use in California, PIER Final Project Report, CEC-500-2006-118, (2006).

[175] California Air Pollution Control Officers Association, CalEEMod™ version 2016.3.2 User's Guide, October 2017, http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4.

[176] California Air Pollution Control Officers Association, CalEEMod™ version 2016.3.2 Appendix A, Calculation Details for CalEEMod, October 2017, California Air Pollution Control Officers Association, CalEEMod™ version 2016.3.2 User's Guide, October 2017.

The Project does not include fireplaces in any residential units; therefore, the Project would not result in fireplace emissions.

Emissions calculations for the Project include credits or reductions for GHG-reducing measures that are required by regulation, such as reductions in energy and water demand from the 2016 Title 24 standards and the California Green Building Standards (CALGreen) Code. The Project is also subject to the City's Green Building Code, which incorporates by reference the CALGreen Code, as well as additional City requirements.

Estimates of Project Emissions

Estimates of the GHG emissions attributable to the existing site, to Project construction and annual Project operation are presented below.

The existing site's estimated annual operational GHG emissions are shown in **Table 5-11**, *Estimated Existing Site Annual Operational Greenhouse Gas Emissions*.

TABLE 5-11
ESTIMATED EXISTING SITE ANNUAL OPERATIONAL GREENHOUSE GAS EMISSIONS (BUILDOUT YEAR 2021)

Emissions Source	Existing Site CO_2e (metric tons)[a]
On-Road Mobile[b]	121
Area	<1
Electricity	47
Natural Gas	8
Water and Wastewater	10
Solid Waste	16
Stationary	—
Total	**202**

[a] Totals may not add up exactly due to rounding in the modeling calculations.
[b] GHG emissions associated with light-duty automobiles and light-duty trucks are not included for the Existing Site pursuant to SB 375 CEQA Streamlining.

SOURCE: ESA 2018

The GHG emissions associated with construction of the Project were calculated for each year of construction activity. The results of these calculations are presented in **Table 5-12**, *Estimated Construction Greenhouse Gas Emissions*. As shown, Project construction would result in a net total GHG emissions of 2,296 CO_2e, or an average of 767 CO_2e each year of the three-year construction period, or 77 CO_2e per year amortized over 30 years.

TABLE 5-12
ESTIMATED CONSTRUCTION GREENHOUSE GAS EMISSIONS

Construction Year	CO_2e (Metric Tons)[a,b]
Year 1	591
Year 2	890
Year 3	1,017
Total (over 26 months)	**2,498**
Existing Site (over 26 months)[c]	438
Net Total	**2,060**
Amortized Emissions (30-years)	**69**

[a] Totals may not add up exactly due to rounding in the modeling calculations.
[b] CO_2e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change *Fourth Assessment Report: 25 for CH_4 and 298 for N_2O* (Intergovernmental Panel on Climate Change, *Fourth Assessment Report: The Physical Science Basis, Summary for Policy Makers*, 2007).
[c] Apportioned to 26 months as follows: 202 $MTCO_2e$ * 26 months / 12 months = 438 $MTCO_2e$.

SOURCE: ESA 2018

The Project's estimated annual net operational GHG emissions and the Project's total net GHG emissions (including the Project's construction GHG emissions amortized over 30 years) are shown in **Table 5-13**, *Estimated Project Annual Operational Greenhouse Gas Emissions*.

TABLE 5-13
ESTIMATED ANNUAL OPERATIONAL GREENHOUSE GAS EMISSIONS (BUILDOUT YEAR 2021)

Emissions Source	Project CO_2e (metric tons)[a]
Construction (Amortized)	69
On-Road Mobile[b]	299
Area	4
Electricity	1,328
Natural Gas	289
Water and Wastewater	219
Solid Waste	32
Stationary	32
Total	**2,272**
Existing	202
Project Net Total	**2,070**

[a] Totals may not add up exactly due to rounding in the modeling calculations.
[b] GHG emissions associated with light-duty automobiles and light-duty trucks are not included for the Existing Site or Project pursuant to SB 375 CEQA Streamlining.

SOURCE: ESA, 2018.

The Project's Consistency with Applicable Regulatory Plans and Policies to Reduce GHG Emissions

CARB's Climate Change Scoping Plan

In support of HSC Division 25.5, the State has promulgated specific laws aimed at GHG reductions applicable to the Project. The primary focus of many of the statewide and regional mandates, plans, policies and regulations is to address worldwide climate change. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. The GHG emissions of the Project alone would not likely cause a direct physical change in the environment. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[177] It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone.

Table 5-14, *Consistency with Applicable Greenhouse Gas Reduction Strategies*, contains a list of GHG-reducing strategies as they relate to the Project. The analysis describes the consistency of the Project with these strategies that support the State's strategies in the Climate Change Scoping Plan to reduce GHG emissions. The Climate Change Scoping Plan relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program. As shown below, the Project would implement PDFs and incorporate characteristics to reduce energy, conserve water, reduce waste generation, and reduce vehicle travel consistent with statewide strategies and regulations. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

TABLE 5-14
CONSISTENCY WITH APPLICABLE GREENHOUSE GAS REDUCTION STRATEGIES

Sector/Source	Category/Description	Consistency Analysis
Energy		
California Renewables Portfolio Standard	Increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020. SB 350 requires 50 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. In September 2018, SB 100 updated the requirement to 60 percent by 2030.	**Consistent.** The Project would use electricity provided by LADWP, which is required to meet the 2020 and 2030 performance standards. The Project would use electricity provided by LADWP, which is committed to achieving 50 percent renewables by 2025 and will be required pursuant to the recently adopted SB 100 to update plans to comply with 60 percent by 2030. The Project would also meet or exceed the applicable requirements of the CALGreen Code. The Project would use energy efficient appliances in the residential building.

[177] California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhous Gas Emissions from Projects Subject to the California Environmental Quality Act*, 2008.

Sector/Source	Category/Description	Consistency Analysis
CCR, Title 24	Energy Efficiency Standards for Residential and Nonresidential Buildings	**Consistent.** The Project would meet or exceed the applicable requirements of the CALGreen Code. The Project would also incorporate energy efficiency measures as outlined in PDF GHG-1.
AB 1109	The Lighting Efficiency and Toxics Reduction Act (AB1109) prohibits manufacturing specified general purpose lights that contain levels of hazardous substances prohibited by the European Union. AB 1109 also requires a reduction in average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018	**Consistent.** As discussed above, the Project would meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code and would also incorporate energy efficiency measures as outlined in PDF GHG-1.
California Title 24 Building Standards Code and Green Building Standards Code Requirements	All bathroom exhaust fans shall be ENERGY STAR compliant.	**Consistent.** The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2010, Appendix G and the Title 24 Building Energy Efficiency Standards.
	HVAC Systems will be designed to meet ASHRAE standards.	**Consistent. T**he Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2010, Appendix G and the Title 24 Building Energy Efficiency Standards.
	Energy commissioning shall be performed for buildings larger than 10,000 sf.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements for performing energy commissioning prior to occupancy.
	Air filtration systems are required to meet a minimum of MERV 6 or higher.	**Consistent.** The Project would be required to install air filtration systems that meet a minimum rating of MERV 6 per State requirements and/or MERV 8 as part of its compliance with the City's requirements (LAMC Section 99.05.504.5.3).
	Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles.	**Consistent.** The Project would encourage the use of alternative modes of transportation by including pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs. equipment installation.
	Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips.	**Consistent.** The Project would meet this requirement by providing 158 bicycle parking spaces, including 141 long-term and 17 short-term spaces in compliance with the City's requirements.
	Stormwater Pollution Prevention Plan (SWPPP) required.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. Refer to Item 5.10, *Hydrology and Water Quality*, for a discussion of compliance with applicable SWPPP requirements.

Sector/Source	Category/Description	Consistency Analysis
	Indoor water usage must be reduced by installing toilets and urinals that meet specified flush volumes and showerheads and faucets that meet specified gallons per minute water rates.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. The Project's design would utilize low-flow water fixtures that as a minimum comply with the flush volumes and gallons per minute water rates in the CALGreen Code and City requirements.
	Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	**Consistent.** The Project would meet or exceed this requirement as part of its compliance with the City's requirements and the CALGreen Code. The City approves waste haulers that provide waste collection services in the City. The City has also approved Ordinance No. 181519 (LAMC Sections 66.32-66.32.5), which requires the diversion of mixed construction and demolition debris to City certified construction and demolition waste processors. The Project would be consistent with the City and State waste requirements by utilizing waste collection services that are approved by the City and that meet the applicable requirements for waste documentation, diversion, and recycling mandates.
	Requires documentation of types of waste recycled, diverted or reused.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. The City approves waste haulers that provide waste collection services in the City. The Project would be consistent with the City and State waste requirements by utilizing waste collection services that are approved by the City and that meet the applicable requirements for waste documentation, diversion, and recycling mandates.
	Requires use of low VOC coatings consistent with AQMD Rule 1168.	**Consistent.** The Project would be consistent with this regulation and would meet or exceed the low VOC coating requirements as contractors would be regulatorily required to use SCAQMD Rule 1168-compliant coatings.
	100 percent of vegetation, rocks, soils from land clearing shall be recycled or stockpiled on-site.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
Mobile Sources		
AB 1493 (Pavley Regulations)	Reduces GHG emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model years 2017–2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions standards as Project residents, workers, and visitors would drive vehicles that comply with California vehicle emissions standards.
Low Carbon Fuel Standard (Executive Order S-01-07)	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards as Project residents, workers, and visitors would drive vehicles that utilize commercially sold transportation fuels (e.g., gasoline fuel sold at retail service stations) that comply with California's Low Carbon Fuel Standard.

Sector/Source	Category/Description	Consistency Analysis
Advanced Clean Cars Program	In 2012, CARB adopted the Advanced Clean Cars (ACC) program to reduce criteria pollutants and GHG emissions for model year vehicles 2015 through 2025. ACC includes the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.	**Consistent.** The standards would apply to all vehicles used by employees, apartment residents, and restaurant customers associated with the Project. The Project would install pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs.
SB 375	SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.	**Consistent.** The Project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement "smart growth." The Project would provide employment opportunities in close proximity to off-site residential and other job centers in Los Angeles where people can live and work and have access to convenient modes of transportation that provides options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The Project would incorporate PDFs that would meet the applicable requirements of CALGreen and the City of Los Angeles Green Building Code. The Project would also reduce VMT, as a result of its urban infill location, with nearby access to public transportation within a quarter-mile of the Project Site, and its proximity to other destinations including off-site residential, commercial, and services.
Water		
CCR, Title 24	Title 24 includes water efficiency requirements for new residential and non-residential uses.	**Consistent.** See discussion under California Green Building Standards Code Requirements above.
Senate Bill X7-7	The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal.	**Consistent.** See discussion under California Green Building Standards Code Requirements above.
Solid Waste		
California Integrated Waste Management Act (IWMA) of 1989 and AB 341	The IWMA mandated that state agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50 percent of their solid waste from disposal facilities. AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a statewide goal for 75 percent disposal reduction by the year 2020.	**Consistent.** The Project would be served by a solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with Citywide recycling targets. According to the City of Los Angeles Zero Waste Progress Report (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012.[178]

[178] City of Los Angeles, Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013, https://bioenergyproducers.files.wordpress.com/2016/11/la-zero-waste-report.pdf . Accessed September 2018.

Sector/Source	Category/Description	Consistency Analysis
Other Sources		
Climate Action Team	Reduce diesel-fueled commercial motor vehicle idling.	**Consistent.** The Project would be consistent with the CARB Air Toxics Control Measure to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time.
	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's waste diversion requirements and the CALGreen Code. The Project would be served by a City-approved solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with Citywide recycling targets.
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	**Consistent.** The Project would provide appropriate landscaping on the Project Site including vegetation and approximately 64 trees.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. The Project's design would utilize low-flow water fixtures that as a minimum comply with the flush volumes and gallons per minute water rates in the CALGreen Code and City requirements.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	**Consistent.** The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2010 Appendix G, the Title 24 Building Energy Efficiency Standards, and the CALGreen Code.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors, and implementing intelligent transportation systems.	**Consistent.** The Project would incorporate physical and operational Project characteristics that would reduce vehicle trips and VMT and encourage alternative modes of transportation for guests and employees. The Project would reduce VMT as a result of its urban infill location, with nearby access to public transportation within a quarter-mile of the Project Site, and its proximity to other destinations including off-site residential, commercial, and services.
	Reduce energy use in private buildings.	**Consistent.** The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2010 Appendix G, the Title 24 Building Energy Efficiency Standards, and the CALGreen Code. Renovated buildings would also utilize energy efficient appliances and equipment consistent with Title 24 standards and comply with CALGreen Code.

SOURCE: ESA, 2018.

Furthermore, in addition to the Project's consistency with applicable GHG reduction strategies, the Project would not conflict with the future anticipated statewide GHG reductions goals. CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels. These potential strategies include renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high speed rail and other alternative transportation options, and use of high efficiency appliances, water heaters, and HVAC systems. The Project would benefit from statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. The Project would also benefit from statewide efforts towards increasing the fuel economy standards of vehicles. The Project would support alternative transportation and reducing VMT growth given its location at an infill site close to existing and future transit (Purple Line Extension). The Project would use energy-efficient appliances and equipment. While CARB is in the process of developing a framework for the 2030 reduction target in the Scoping Plan, the Project would support or not impede implementation of these potential reduction strategies to be identified by CARB. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

SCAG's 2016 RTP/SCS

Transportation-related GHG emissions are the largest sector of emissions from the Project. This finding is consistent with the findings in many regional plans, such as the SCAG RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. The purpose of the SCAG RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2016 RTP/SCS, released in December 2015, states that "[e]ach [Metropolitan Planning Organization] is required to prepare an SCS in conjunction to [sic] with the RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375."[179] SCAG's 2016 RTP/SCS plans for regional population growth using smart land use strategies. As part of the 2016 SCS/RTP, "transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand."[180] Moreover, the 2016 RTP/SCS states that while "[p]opulation and job growth would induce land use change (development projects) and increase VMT, and would result in direct and indirect GHG emissions," the 2016 RTP/SCS "supports sustainable growth through a more compact, infill, and walkable development pattern."[181]

Consistent with 2016 SCAG's RTP/SCS alignment of transportation, land use, and housing strategies, the Project would accommodate increases in population, households, employment, and

[179] Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2015, page 3.8-37.

[180] Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2015, page 3.8-35.

[181] Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2015, page 3.8-36.

travel demand by implementing smart land use strategies. As discussed previously, the Project Site is an infill location close to jobs, off-site housing, and services and in close proximity to existing and future public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops.

Table 5-15, *Consistency with Applicable 2016 SCAG RTP/SCS Actions and Strategies*, contains a list of GHG-reducing actions and strategies from the 2016 SCAG RTP/SCS that are potentially applicable to the Project. The analysis describes the consistency of the Project with these strategies. As shown below, the Project would implement PDFs and incorporate characteristics to reduce vehicle travel consistent with the 2016 SCAG RTP/SCS. The Project also would be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS. (Additional consistency discussion is included in the SCEA's consistency analysis of Section 3, SCEA Criteria and Transit Priority Project Consistency Analysis. Therefore, the Project would be consistent with the GHG emissions reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

TABLE 5-15
CONSISTENCY WITH APPLICABLE 2016 SCAG RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Actions and Strategies		
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 alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would not impact the City's or SCAG's ability to encourage the use of alternative-fueled vehicles through various policies and programs. Specifically, the Project would support a land use pattern that provides increased opportunity of use of alternative transportation modes. The Project would encourage the use of alternative modes of transportation by installing 158 bicycle parking spaces. Additionally, the Project would encourage the use of electric vehicles by installing pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs.
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 facilitate pedestrian and bicycle movements including new street front landscaping to provide and inviting pedestrian environment. The Project would result in a substantial increase in landscaped open space compare to existing conditions. The Project would provide short-term and long term bicycle parking spaces. It would also connect to the surrounding commercial and recreational areas. The Project would locate residential, office, and restaurant uses within an area that has public transit, and employment opportunities, restaurants and services all within walking distance.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
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. The Project would also incorporate measures to reduce air pollutant emissions, minimize hazards, and ensure water quality. As an example, the Project would comply with fugitive dust control measures included in SCAQMD Rule 403. The Project would also implement PDF AIR-1 requiring the use of construction equipment that meet the most stringent Tier 4 emissions standards. As a result, the Project would have less-than-significant localized air quality and health impacts.
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 supports the development of complete communities by co-locating complementary restaurant, office, and residential land uses in in an urban environment near mixed-use development that includes nearby office, residential, service, and commercial uses. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.
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 is located less than 500 feet northwest from the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line. The Metro Purple Line route provides a connection between Mid-Wilshire/Koreatown and Downtown Los Angeles. The Purple Line Extension is under development that would ultimately extend westward for approximately 9 miles, providing additional stations at the Miracle Mile area, the City of Beverly Hills, Century City, and Westwood. Other transportation amenities around the Project Site include multiple bus and shuttle lines; the regional freeway system; bicycle lanes; and an established pedestrian grid. Together, they would maximize mobility and the accessibility to the Project Site.
Consider developing healthy community or active design guidelines that promote physical activity and improved health.	Local Jurisdictions	**Consistent.** The Project would facilitate pedestrian and bicycle movements through and around the Project Site. It would also connect to the surrounding commercial and recreational areas. The Project would locate residential, office, and restaurant uses within an area that has public transit, and employment opportunities, restaurants and services within walking distance. The Project would provide 158 bicycle parking spaces. Therefore, the Project would promote physical activity and improved health such as walking and biking.
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State, SCAG	**Consistent.** The Project would be consistent with the goals of SB 375, including the goal to reduce VMT and the corresponding emission of GHGs. The Project has many Transit Oriented Development (TOD) features, as it is a mixed-use development that includes office, residential, and restaurant uses within close proximity to public transit. The Project is in an urban infill location surrounded by a diverse mixture of land uses including residential, office, commercial development and services. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Transportation Network Actions and Strategies		
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 would facilitate pedestrian and bicycle movements through and around the Project Site. It would also connect to the surrounding commercial and recreational areas. The Project would locate residential, office, and restaurant uses within an area that has public transit, and employment opportunities, commercial development, and services within walking distance. Further, the Project would encourage the use of alternative modes of transportation. The Applicant would install pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs.
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 is located less than 500 feet northwest from the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line. The Metro Purple Line route provides a connection between Mid-Wilshire/Koreatown and Downtown Los Angeles. The Purple Line Extension is under development that would ultimately extend westward for approximately 9 miles, providing additional stations at the Miracle Mile area, the City of Beverly Hills, Century City, and Westwood. Furthermore, the Project would provide a new mixed-use development that would include office, restaurant, and residential uses in an area with pedestrian access to a diverse mixture of land uses.
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 is located less than 500 feet northwest from the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line. The Metro Purple Line route provides a connection between Mid-Wilshire/Koreatown and Downtown Los Angeles. The Project would be a new mixed-use development that includes office, residential, and restaurant uses within close proximity to public transit. The Project is in an urban infill location surrounded by a diverse mixture of land uses including residential, office, commercial development and services. The Applicant would include pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs.
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 impede the City's ability to encourage transit fare and other discounts.
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	**Consistent.** The Project would encourage visitors and residents to minimize vehicle trips. The Project location at an infill site in close proximity to transit would encourage pedestrian activity. The Project would provide 141 long-term bicycle parking spaces and 17 short-term bicycle parking spaces. The Project is located less than 500 feet northwest from the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line. The Project is also within close proximity of numerous bus routes. Therefore, the Project would implement strategies would help to minimize congestion and be compatible with pedestrians, bicycles, transit, and optimize the productivity and overall performance of the transportation system.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	**Consistent.** The Project would encourage active transportation by providing 141 long-term bicycle parking spaces and 17 short-term bicycle parking spaces. The Project is also served by many bus and rail routes in close proximity to the Project.
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	
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.** The Project would neither benefit nor adversely impact the City's development of telecommunicating programs that would reduce congestion and transportation GHG emissions.
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	**Consistent.** The proximity of the Project to alternative transit modes, including regional rail and bus lines, would support the region's transportation investment and the sustainability of the regional transportation system.
Clean Vehicle Technology Actions and Strategies		
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 (Western Riverside COG and South Bay Cities COG) are put forward as best practices that others can adopt in the future. (See Appendix: Vehicle Technology, for more information.)	SCAG, Local Jurisdictions	**Consistent.** As discussed above, while the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would not impact the City's or SCAG's ability to encourage the use of alternative-fueled vehicles through various policies and programs. Specifically, the Project would support a land use pattern that provides increased opportunity of use of alternative transportation modes by providing 141 long-term bicycle parking spaces and 17 short-term bicycle parking spaces. The Project would include pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EVs.

SOURCE: ESA, 2018.

City of Los Angeles LA Green Plan and Sustainable City pLAn

The Project would comply with applicable City strategies to reduce GHG emissions by implementing energy efficient building designs, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. These measures are consistent with the City's GHG reduction, sustainability, and smart-growth goals of improving energy and water efficiency in buildings, decreasing per-capita water use, using energy efficient appliances and equipment, and creating a more livable city.

When implemented, the following planned City actions, as presented in the LA Green Plan, may further decrease emissions of GHGs from the Project. These actions are not under the control of the Project; however, they would nonetheless further reduce Project-related GHG emissions:

- Decreasing emissions from LADWP electrical generation and import activities.
- Promoting walking and biking to work, within neighborhoods, and to large events and venues.
- Expanding the regional rail network to reduce VMT.

Table 5-16, *Consistency with City of Los Angeles LA Green Plan*, and **Table 5-17**, *Consistency with City of Los Angeles Sustainable City pLAn*, contains a list of GHG-reducing strategies applicable to the Project. The Project-level analysis describes the consistency of the Project with these GHG emissions reduction goals and actions. As discussed in below, the Project is consistent with the applicable goals and actions. In addition, as discussed, the Project would also result in GHG reductions beyond those specified by the City and would minimize the GHG emissions relative to the existing Project Site conditions by incorporating energy efficient design features and VMT reduction characteristics.

TABLE 5-16
CONSISTENCY WITH CITY OF LOS ANGELES LA GREEN PLAN

Action		Description	Consistency Analysis
Focus Area: Energy			
E6	Present a comprehensive set of green building policies to guide and support private sector development.	The City embarked on an effort to establish green building requirements, paired with incentives, for medium- to large-private projects. Buildings account for a majority of electricity use. Each building site is a microcosm of the environmental issues faced by the City, so addressing each site in a comprehensive manner will provide a variety of environmental benefits.	**Consistent.** The Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The Project would incorporate energy efficiency measures as outlined in PDF GHG-1. As a result, the Project would be consistent with City's green building policies.
Focus Area: Water			
W1	Meet all additional demand for water resulting from growth through water conservation and recycling.	The Mayor's Office and LADWP developed the *Securing LA's Water Future* plan, which is an aggressive, multifaceted approach to developing a locally sustainable water supply. The plan includes a set of key short-term and long-term strategies to secure our water future, such as: Short-Term Conservation Strategies: • Enforcing prohibited uses of water (levying fines and sanctions against water abusers and increase water conservation awareness); • Expanding the list of prohibited uses of water (possible further restrictions on watering landscape and washing/rinsing vehicles without a self-closing nozzle);	**Consistent.** While this action primarily applies to the City and LADWP, the Project would comply with the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code and incorporate water efficiency measures defined in the PDFs. The reductions would be achieved through the installation of water efficient fixtures that exceed applicable standards and drought-tolerant/California native plant species selection. The Project's design would utilize low-flow water fixtures that as a minimum comply with the flush volumes and gallons per minute water rates in the CALGreen Code and City requirements. As a result, the Project

Action		Description	Consistency Analysis
		• Extending outreach efforts, water conservation incentives, and rebates; and • Encouraging regional conservation measures (encourage all water agencies in the region to adopt water conservation ordinances which include prohibited uses and enforcement). Long-Term Conservation Strategies: • Increasing water conservation through reduction of outdoor water use and new technology; • Maximizing water recycling; • Enhancing stormwater capture; • Accelerating clean-up of the groundwater basin; and • Expanding groundwater storage.	would be consistent with the applicable short- and long-term water conservation strategies.
W2	Reduce per capita water consumption by 20 percent.	See W1, above.	See W1, above.
W3	Implement the City's innovative water and wastewater integrated resources plan that will increase conservation, and maximize use of recycled water, including capture and reuse of stormwater.	See W1, above.	See W1, above.
Focus Area: Transportation			
T4	Complete the Automated Traffic Surveillance and Control System (ATSAC).	This action reduces vehicle emissions that result from idling at intersections. By reducing vehicle stops, delays and travel time through improved traffic signal timing, vehicles can travel a longer distance at a consistent rate of speed, improving fuel economy.	**Consistent.** The Project traffic analysis takes into account the signalized study intersections equipped with the ATSAC and the Adaptive Traffic Control System (ATCS), which are computer-based traffic control systems. The Project would be consistent with this action.
T8	Promote walking and biking to work, within neighborhoods, and to large events and venues.	Promoting alternate modes of travel will reduce the carbon emissions associated with single occupancy vehicles (SOVs). As described in Action Items LU1 and LU2, the City is promoting high-density and mixed-use housing close to major transportation arteries. Such developments will also support the advancement of Action Item T8, by improving accessibility for those who wish to walk and bike to work.	**Consistent.** The Project would facilitate pedestrian and bicycle movements through and around the Project Site. It would also connect to the surrounding neighborhood. The Project would locate residential, office, and restaurant uses within an area that has public transit, and employment opportunities, restaurants and services, within walking distance. The Project would improve pedestrian connectivity to Downtown Los Angeles via connectivity from the Wilshire/Vermont Metro Rail Station to the 7th/Metro Center Station. As a result, the Project would be consistent with this action.

Action		Description	Consistency Analysis
Focus Area: Land Use			
LU2	Promote and implement transit-oriented development (TOD).	Transit Oriented Developments represent opportunities for creating cohesive, vibrant, walkable communities where fragmented, auto-dependent corridors now exist. TODs are a positive alternative to low-density traditional land use patterns that typically segregate housing, jobs and neighborhood services from one another. In contrast, TODs cluster these community elements in close proximity, so a greater portion of trips can be made by transit, bike, or on foot.	**Consistent.** The Project has many TOD features, such as co-locating complementary office, restaurant and residential land uses in close to proximity to a diverse mixture of land uses including nearby residential, commercial, office, and services uses. The Project Site is located in a highly walkable area served by frequent and comprehensive transit opportunities. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions. As a result, the Project is consistent with this City action.
LU3	Make available underutilized city land for housing and mixed-use development.	The City can leverage the value of its real estate assets, whether developed and unimproved lands, to further Smart Growth policies such as improving access to transportation, strengthening job/housing linkages, reducing vehicle trips, providing non-traditional open space such as linear networks, and parkland that is built upon freeway covers.	**Consistent.** While not City-owned land, the Project is a mixed-use development located 500 feet from the Wilshire/Vermont Metro Rail Station which has connectivity to Downtown Los Angeles via the 7th/Metro Center Station. Accordingly, the Project would be located in an area well-served by multiple public transportation options and in a highly walkable environment; facilitate pedestrian and bicycle movements through and around the Project Site; and would provide new open space landscaping that would complement the aesthetic character of the Project Site and enhance its relationship to surrounding buildings. These features would substantially reduce VMT and transportation-related GHG emissions.
LU6	Make available underutilized city land within 1,500 feet of transit for housing and mixed-use development.	See LU3, above.	See LU3, above.

Action		Description	Consistency Analysis
Focus Area: Waste			
WsT1	Reduce or recycle 70% of trash by 2015.	Source reduction and recycling programs not only conserve natural resources and landfill space, but also confer climate benefits.	**Consistent.** The Project would be served by a solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with citywide recycling targets. According to the City of Los Angeles *Zero Waste Progress Report* (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012.[182]
Focus Area: Open Space and Greening			
OS/G3	Plant 1 million trees throughout Los Angeles.	The Mayor launched the "Million Trees LA" (MTLA) Initiative in September 2006. The initiative is rooted in the idea that natural processes can reduce pollution and transform our city into a sustainable, green city. The one million new trees will provide shade and reduce energy costs, clean the air, absorb the GHGs that cause global warming, capture polluted urban runoff, improve water quality, provide homes for wildlife, and add beauty to neighborhoods.	**Consistent.** The Project would have approximately 64 trees as part of the landscaping. The Project would provide landscaping that would complement the aesthetic character of the Project Site and enhance its relationship to surrounding buildings. As a result, the Project would be consistent with this action and help the City to achieve its goal.

SOURCE: City of Los Angeles, *LA Green Plan*, 2008; ESA, 2018.

TABLE 5-17
CONSISTENCY WITH CITY OF LOS ANGELES SUSTAINABILITY CITY PLAN

Action	Description	Consistency Analysis
Focus Area: Environment		
Local Water	Lead the nation in water conservation and source the majority of water locally	**Consistent.** The Project would comply with the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code and incorporate water efficiency measures as defined in the PDFs. The reductions would be achieved through the installation of low-flow water and drought-tolerant/California native plant species selection. The Project would not conflict with the City's and LADWP's ability to provide locally sourced water.
Energy Efficient Buildings	Save money and energy by increasing the efficiency of buildings	**Consistent.** The Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The Project would incorporate energy efficiency measures as defined in the PDFs.
Carbon and Climate Leadership	As a proactive leader on climate issues, strengthen Los Angeles' economy by dramatically reducing GHG emissions and rallying other cities to follow Los Angeles' lead	**Consistent.** The Project would be designed to incorporate energy and water efficient designs that exceed the standards, which would result in substantial GHG emissions reductions. The Project would also be located in an area well served by multiple public transportation options and in a highly walkable environment, which would substantially reduce transportation-related GHG emissions.

[182] City of Los Angeles Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013, https://bioenergyproducers.files.wordpress.com/2016/11/la-zero-waste-report.pdf. Accessed November 2018.

Action	Description	Consistency Analysis
Waste and Landfills	Become the first big city in the United States to achieve zero-waste, and recycle and reuse most of its waste locally	**Consistent.** The Project would be served by a solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with citywide recycling targets.
Focus Area: Economy		
Mobility and Transit	Invest in rail, bus lines, pedestrian/bike safety, and complete neighborhoods that provide more mobility options and reduce VMT	**Consistent.** The Project would be located in an area well served by multiple public transportation options and in a highly walkable environment, which would substantially reduce VMT and transportation-related GHG emissions.
Preparedness and Resiliency	Prepare for natural disasters and decrease vulnerability to climate change	**Consistent.** The Project would be constructed to meet or exceed City requirements for fire, earthquake, and other building safety standards.
Focus Area: Equity		
Air Quality	Healthy air to breathe	**Consistent.** The Project would implement emissions reductions measures during construction and operations, such as the use of construction contractors that comply with regulations to minimize air pollutant emissions including the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks reducing exhaust DPM emissions and the CARB In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of DPM filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Project construction would also comply with the applicable provisions of the CARB Truck and Bus regulation to reduce particulate matter and nitrogen oxide (NO_X) emissions from diesel trucks. Furthermore, the Project is located less than 500 feet northwest from the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line. Proximity to the Wilshire/Vermont Metro Rail Station would encourage Project residents, workers, and visitors to replace vehicle trips with public transportation, which would minimize Project-related vehicle emissions.
Urban Ecosystem	Have access to parks, open space, including a revitalized Los Angeles River Watershed	**Consistent.** The Project is located within a mile of many parks and open spaces including the Shatto Recreation Center, the Lafayette Recreation Center, and MacArthur Park.
Livable Neighborhoods	Live in safe, vibrant, well-connected, and healthy neighborhoods	**Consistent.** The Project would be consistent with nearby vibrant, safe, and well-connected neighborhoods. The Project would provide landscaping that would complement the aesthetic character of the Project Site and enhance its relationship to surrounding buildings. All of the open space areas would have extensive landscaping and well-detailed hardscape.

SOURCE: City of Los Angeles, Sustainable City pLAn, 2008; ESA, 2018

The analysis above describes the consistency of the Project with the applicable City GHG emissions reduction plans, policies, and regulations, including the City's LA Green Plan and the City's Sustainable City pLAn. As discussed above, the Project would incorporate water conservation, energy conservation, tree-planting, and other features consistent with these plans. Therefore, the Project would be consistent with the City's applicable plans, policies, or regulations for GHG emissions.

Green Building Code

The Project would comply with the Los Angeles Green Building Code to reduce GHG emissions by reducing indoor and outdoor water demand, installing energy-efficient appliances and equipment, and complying with 2016 California Title 24 Building Energy Efficiency Standards, as amended by the City. The Project would also meet the mandatory measures of the CALGreen Code as amended by the City by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The heating, ventilation, and air conditioning (HVAC) system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Therefore, the Project would be consistent with the City's Green Building Code.

Consistency with Executive Orders S-3-05 and B-30-15

At the state level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (HSC Division 25.5). As analyzed above, the Project would be consistent with HSC Division 25.5. Therefore, the Project does not conflict with this component of the Executive Orders.

California is on track to meet its 2050 GHG reduction target as specified in S-3-05.[183] In 2015, Executive Order B-30-15 established GHG reduction targets of 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The State's existing and proposed regulatory framework can allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. According to the 2017 Scoping Plan, reductions needed to achieve the 2030 target are expected to be achieved by targeting specific emission sectors, including those sectors that are not directly controlled or influenced by the Project, but nonetheless contribute to Project-related GHG emissions. For instance, Project-related emissions would decline pursuant to the regulation as utility providers and transportation fuel producers are subject to renewable energy standards, Cap-and-Trade, and the LCFS. The 2017 Scoping Plan also calls for the doubling of the energy efficiency savings, including demand-response flexibility for 10 percent of residential and commercial electric space heating, water heating, air conditioning and refrigeration. The strategy is in the process of being designed specifically to accommodate existing residential and commercial uses under the CEC's Existing Building Energy Efficiency Action Plan.[184] This strategy requires the CEC in collaboration with the CPUC to establish the framework for the energy savings target setting outlines the necessary actions that will need to occur in future years, including workforce education and training institutions engaging with the building industry, mapping industry priorities for efficiency to major occupations that will provide services, identifying workforce competency gaps, and quantifying the work needed to build a workforce to implement high-quality efficiency projects at

[183] CARB, 2017 Climate Change Scoping Plan, p. 9, November 2017.

[184] California Energy Commission, 2016 Existing Buildings Energy Efficiency Plan Update, December 2016, http://docketpublic.energy.ca.gov/PublicDocuments/16-EBP-01/TN214801_20161214T155117_Existing_Building_Energy_Efficency_Plan_Update_Deceber_2016_Thi.pdf. Accessed November 200018.

scale.[185] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they 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.[186] For example, the 2017 Scoping Plan states some policies are not feasible at this time, such as Net Zero Carbon Buildings, however this type of policy would be necessary to meet the 2050 target.

With statewide efforts underway to facilitate the State's achievement of those goals, it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. Stated differently, the Project's emissions at buildout (2021) likely represents the maximum emissions for the Project as anticipated regulatory developments and technology advances are expected to reduce emissions associated with the project, such as emissions related to electricity use and vehicle use. Given that the Project is consistent with the Scoping Plan, the RTP/SCS and the City's relevant plans and policies, and given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Order goals for 2030 and 2050. Therefore, the Project would be consistent with California's long-term GHG reduction goals, including Executive Orders S-3-05 and B-30-15.

Conclusion

In summary, the Project's GHG emissions analysis and the Project's consistency analysis with respect to applicable regulatory plans and policies to reduce GHG emissions provided above demonstrates that the Project would substantially comply with or exceed the GHG reduction actions and strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2016 RTP/SCS, and the Green LA Plan, Sustainable City pLAn and Green Building Code. Given the Project's consistency with these applicable regulatory plans and policies to reduce GHG emissions, along with implementation of PDF GHG-1 (Green Building Features), the Project's GHG emissions, either directly or indirectly, would be less than significant and no mitigation measures are required.

Cumulative Impacts: Greenhouse Gas Emissions

The State of California, through AB 32, has acknowledged that GHG emissions are a statewide impact. The Office of Planning and Research (OPR) acknowledges that although climate change

[185] California Energy Commission, 2016 Existing Buildings Energy Efficiency Plan Update, December 2016, http://docketpublic.energy.ca.gov/PublicDocuments/16-EBP-01/TN214801_20161214T155117_Existing_Building_Energy_Efficency_Plan_Update_Deceber_2016_Thi.pdf. Accessed November 2018

[186] Energy + Environmental Economics (E3), Summary of the California State Agencies' PATHWAYS Project: Long-Term Greenhouse Gas Reduction Scenarios, April 2015; Greenblatt, Jeffrey, "Modeling California Impacts on Greenhouse Gas Emissions," Energy Policy, Vol. 78, pages 158-172. The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80% below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.

is cumulative in nature, not every individual project that emits GHGS must necessarily be found to contribute to a significant cumulative impact on the environment. CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of the project. As discussed above, the Project would be consistent with AB 32, SB 375, SB 32, the 2016-2040 RTP/SCS, and the City's local GHG reduction plan, the GreenLA CAP. Therefore, the Project's incremental contribution to any cumulative impacts would be less than significant and would not be cumulatively considerable.

5.9 Hazards and Hazardous Materials

The following discussion is based in part, on the *Phase I Environmental Site Assessment* (Phase I ESA) prepared by AEI, dated December 5, 2017. The Phase I ESA, which is included in Appendix G, was conducted to evaluate the presence of known or suspected hazardous materials or waste at the Project Site. The Phase I ESA was performed in conformance with the scope and limitations of the Society for Testing and Materials (ATSM) standard practice E1527-13 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquires. The following discussion is also based on the on the *Subsurface Investigation Report, 3119 West 6th Street, Los Angeles, California* (Subsurface Investigation Report) prepared by Hazard Management Consulting (HMC), dated September 20th 2018 (Appendix G).

The purpose of the Subsurface Investigation Report was to evaluate the presence of chemicals of concern stemming from historical uses adjacent to the Project Site identified during the Phase I ESA. Specifically, while the Phase I ESA did not identify any recognized environmental conditions (RECs) associated with past and present land uses on the Project Site, it did identify a leaking underground storage tank (LUST) case at a former gasoline station west of the Project Site. The Phase I ESA concluded that groundwater beneath the Project Site may be impacted as a result of the LUST, which has since been closed by the Regional Water Quality Control Board (RWQCB). Additionally, the Project Site is located within a Methane Zone as defined by the City of Los Angeles Department of Building and Safety (LADBS). Due to the recommendations contained in the Phase I ESA, a Subsurface Investigation Report was prepared.

Two previous reports were also prepared for the Project Site, which are summarized below:

- *Phase I Environmental Site Assessment (3119 W. 6th Street, Los Angeles, California 90012)*, prepared by Hazard Management Consulting, Inc. (HMC), dated October 3, 2017.

  The Phase I ESA prepared by HMC for the Project Site recommended that prior to any demolition, an asbestos survey should be conducted and asbestos containing materials should be removed prior to demolition. In addition, if development of the Project Site occurs, a methane survey should be prepared for submittal to the Los Angeles Department of Building and Safety.

- *Additional Off-Site Research Report, Shatto Investment Company, (3151 W. 6th Street Los Angeles, California 90021 RWQCB File No. 90020015 Assessment*, prepared by CTL Engineering Services, dated January 14, 2009.

  This report describes the potential off-site petroleum hydrocarbon source areas for the elevated concentrations of total petroleum hydrocarbons as gasoline and volatile organic compounds detected in off-site groundwater monitoring wells situated east of the Project Site located at 3151 W. 6th Street, Los Angeles, California. The report also researched environmental records pertaining to the two off-site properties of concern located at 3119 and 3130 West 6th Street to the east and southeast of the Project Site.

Copies of both reports listed above are included as part of the Phase I ESA contained in Appendix G.

Would the project:

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

Less Than Significant with Mitigation Incorporated. Typical of many construction projects, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Also, all construction work would be performed consistent with applicable federal Occupational Safety and Health Administration (OSHA) Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers.

As discussed below under Item 5.9.b, the Project Site contains contaminated soils below 20 feet bgs that would be removed during excavation. As described in detail below in MM HAZ-1 and in the discussion under Item 5.9.b, the Project's incorporation of MM HAZ-1 ensures that the transport and disposal of the contaminated soils removed from the Project Site would not create a significant hazard to the public or the environment. Impacts would be less than significant with mitigation incorporated.

Operation of the Project's residential, office, and commercial uses would involve the use and storage of small quantities of potentially hazardous materials in the form of typical cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Therefore, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Conclusion:

With compliance with applicable regulatory requirements and MM HAZ-1, impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. Project construction would not involve the use of hazardous materials in substantial amounts such that a measurable risk to the public or the environment would result from construction activities. However, construction activities or excavation activities could potentially reveal to the presence of unknown hazardous materials in Project Site soil and/or groundwater should such materials be present.

As noted above, operation of the Project would not involve the routine use, storage, transport, or disposal of notable quantities of hazardous materials. Operation of the Project would involve the use of only small quantities of hazardous materials typically used in residential and commercial projects such as cleaning solvents, painting supplies, pesticides for landscaping; however, such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.

The Phase I ESA prepared for the Project identified the following items of potential environmental concern:

Asbestos-Containing Building Materials

The Project Site is currently developed with school-related buildings and a surface parking lot. The Project Site was historically used for residential, church and school uses. The Project Site was undeveloped through the early 1920s when it was developed with residential buildings. The former church building was constructed in 1936 and the other school buildings were added in 1953, 1966 and 2005. As the majority of the onsite structures were built before the 1978 federal regulations banning the use of asbestos containing building materials (ACBMs) were enacted, there is a potential for the presence of ACBMs in the on-site buildings. Therefore, prior to the issuance of any permit for the demolition of the existing buildings or the alteration of the existing church building to be retained, a comprehensive ACBMs survey of the buildings must be performed. California Health and Safety Code Section 19827.5, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. If no ACBMs are found, the Project Applicant shall provide a letter to the City of Los Angeles Department of Building and Safety (LADBS) from a qualified asbestos consultant indicating that no ACBMs are present in the onsite buildings. However, if ACBMs are found to be present, they would be abated in compliance with the SCAQMD Rule 1403 and other applicable State and federal rules and regulations. With regulatory compliance, the risk related to any existing ACBMs at the Project Site would be reduced to acceptable levels, and the Project would result in no impact with regard to ACBMs.

Lead-Based Paint

Lead and lead compounds can be found in many types of paint. In 1978, the Consumer Product Safety Commission set the allowable lead levels in paint at 0.06 percent by weight in a dry film of newly applied paint. In the 1970s, the chief concern of lead paint was its cumulative effect on

bodily systems, primarily when paint chips containing lead were ingested by children. As discussed above, the existing onsite buildings were constructed prior to the 1978 federal regulations banning the use of lead-based paints (LBPs). Therefore, there is potential for the presence of LBPs in the onsite buildings, which could pose a significant hazard to construction workers or the public.

Cal/OSHA's Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when LBP would be disturbed during construction.[187] The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA requires 24-hour notification if more than 100 sf of LBP would be disturbed. The regulations to manage and control exposure to LBP pertain to Project construction and include the potential demolition and disposal of lead-containing materials.

Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to CalOSHA regulations. With regulatory compliance, the risk related to any existing LBPs at the Project Site would be reduced to acceptable levels, and the Project would result in no impact with regard to LBPs.

The following topics below were not identified as areas of potential concern but were identified during the Phase I ESA reconnaissance findings.

PCBs

Polychlorinated biphenyls (PCBs) were once used as industrial chemicals whose high stability contributed to both their commercial usefulness and their long-term deleterious environmental and health effects. These substances have been listed as carcinogens by the Environmental Protection Agency (EPA). PCBs were banned from general commercial use in 1977. PCBs are regulated by the EPA under the Toxic Substances Control Act (TSCA). The TSCA contains provisions controlling the continued use and disposal of existing PCB-containing equipment. Items that could potentially contaminate the Project Site with PCBs include electrical capacitors and transformers, fluorescent light ballasts, hydraulic oils used in hydraulic lifts and elevators, vacuum pumps, gas turbines, and other petroleum products manufactured prior to the 1977 ban.

However, no equipment such as aboveground hydraulic lifts, transformers, or other equipment of concern were observed at the Project Site. As such, the presence of PCB's is not expected, and the Project would result in no impact with respect to PCB contamination.

Radon Gas

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The US EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones, according to the list below:

[187] California Code of Regulations, Title 8, Section 1532.1 Lead. https://www.dir.ca.gov/title8/1532_1.html.

EPA RADON ZONES

EPA Zones	Average Predicted Radon Levels	Potential
Zone 1	Exceed 4.0 pCi/L	Highest
Zone 2	Between 2.0 and 4.0 pCi/L	Moderate
Zone 3	Less than 2.0 pCi/L	Low

Radon sampling was not conducted as part of the Phase I ESA. However, the Phase I ESA indicated that according to the California Department of Health Services Radon Database, 18 tests were conducted for radon levels in the zip code of the Project Site (90020) in 2016. All of these tests indicated that radon levels were below the action level of 4.0 pCi/L set forth by the US EPA. According to the ESAP Map of Radon Zones, the Project Site is within the Zone 2 classification. Due to the Zone 2 classification and the design of the Project, which would include four levels of fully subterranean parking, radon is not considered to be a significant environmental concern at the Project Site. As such, the presence of radon gas is not expected at the Project Site, and the Project would result in no impact with respect to radon gas contamination.

Recognized Environmental Conditions (REC)

The Phase I ESA (Appendix G) evaluated the presence of Recognized Environmental Conditions (RECs) through a Project Site reconnaissance, interviews, Sanborn Maps, research of land use records, and aerial photography review. The Phase I ESA also contains a database search of government record sources, (e.g., EDR Radius Report, U.S. Protection Agency, Department of Health Services, and Regional Quality Control Board other sources for preliminary indications of hazardous material use, storage, or disposal at the Project Site and within a one-mile radius of the Project Site).

According to the regulatory database review conducted as part of the Phase I ESA, the Project Site has not been identified as a REC. The Phase I ESA identified a site located at 3151 West 6th Street, formerly used as a service station, located approximately 130 feet west of the Project Site as a REC. The California Regional Water Quality Control Board, Los Angeles Region (RWQCB) issued a no further action (NFA) letter for the former gasoline station site in April 2009. Based on a review of the most recent groundwater data from these wells (2009), elevated concentrations of contaminants of concern were present including benzene and total petroleum hydrocarbons. Based on the relative proximity of the plume to the Project Site, it has the potential to impact the Project Site, which constitutes a REC.

Due to potential off-gassing of vapors from the impacted groundwater, the Phase I ESA utilized the EPA's Vapor Intrusion Screening Level (VISL) Calculator; a screening level model which assesses the potential for vapor intrusion. The results of this screening tool indicated that the there is a potential for vapor-phase migration onto the Project Site. As such, the Phase I ESA deemed that the vapor plume constituted a REC which warranted further investigation. As described previously, a Subsurface Investigation Report (Appendix G) was prepared that included the collection of soil, soil gas, and groundwater samples throughout the Project Site.

As part of the Subsurface Investigation Report, on May 23, 2018, six soil borings for the collection of soil samples, groundwater samples and for the installation of nested soil vapor monitoring points were advanced on the Project Site. Two vapor points were also installed and sampled. The soil vapor monitoring points were sampled for VOCs. Selected soil samples were collected for laboratory analyses and screened in the field for stains, odors, and elevated photoionization detector (PID) readings. The results of the testing are described below.

Soil Sampling Results

No stained or odorous soil, or elevated PID readings, were noted from the surface to approximately 20 feet bgs throughout the Project Site. The results of the laboratory analysis of the soil samples verified these field observations, finding no detectable concentrations of gasoline range petroleum hydrocarbons (TPH cc) and no detectable to low concentrations of VOCs and Title 22 metals.[188]

Based on these results, these soils are considered to be non-hazardous waste when excavated and disposed of during construction activities. However, soils encountered at depths greater than approximately 20 feet bgs in the southern portion of the Project Site indicated a strong petroleum hydrocarbon odor and PID readings of greater than 50 parts per million (ppm) of VOCs.

The Project includes MM HAZ-1, which includes features required to comply with the South Coast Air Quality Management District's (SCAQMD) Rule 1166. SCAQMD Rule 1166 requires ongoing monitoring for VOC contaminated soils, ongoing testing of soils, the segregation and covering of VOC contaminated soils, and appropriate removal and disposal of VOC contaminated soils. A Site Specific Soil Mitigation Plan (SMP) would be prepared and approved by the SCAQMD prior to commencing soil excavation. The SMP would provide safety guidance to contractors on the appropriate screening and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. The SMP includes protocols for ongoing testing and appropriate separation and disposal of VOC contaminated soils. Soil monitoring would be completed during excavation in accordance with SCAQMD's Rule 1166 and the SMP.

The Project's incorporation of MM HAZ-1 would ensure that development of the Project would create a less-than-significant impact with respect to contaminated soils.

Groundwater Sampling Results

Groundwater samples were collected from two soil borings in the southern portion of the Project Site and one soil boring in the northern portion of the Project Site. Groundwater was encountered 38 to 43 feet below the surface.[189] Laboratory analysis of the groundwater samples taken indicated elevated concentrations of gasoline and gasoline constituents, such as benzene and

[188] Heavy metals described in the California Code of Regulations.

[189] Groundwater was encountered at 38 feet at one boring conducted as part of the *Subsurface Investigation Report, 3119 West 6th Street, Los Angeles, California* prepared by HMC, September 20,2018. As groundwater levels fluctuate throughout the year and after periods of rain, the groundwater levels are not inconsistent, however, the analysis contained in this SCEA MND uses a groundwater level of 38 feet for a conservative analysis.

toluene, with lesser concentrations in the northern portion of the Project Site; these results are consistent with the general distribution of gasoline products documented in the off-site LUST case.

Based on these results, the groundwater generated during dewatering activities would require treatment prior to discharge to the municipal sewer or stormwater system. As such, the Project would be required to comply with the General National Pollutant Discharge Elimination System (NPDES) requirements and other applicable groundwater water discharge requirements enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB) that ensure that contaminated groundwater removed during construction dewatering is treated prior to discharge to the municipal sewer or stormwater system. In addition, the Project includes MM HAZ-2, to reduce the potential the risk from contact with the contaminated groundwater during construction. As described below, MM HAZ-2 requires the preparation of a Groundwater Management Plan (GWMP) that would include ongoing testing of groundwater, training, protocols, and implementation of a safety plan for contractors for avoiding contact with groundwater during excavation, and appropriate disposal of groundwater.

The Project's compliance with NPDES requirements and other applicable groundwater discharge requirements, and its incorporation of MM HAZ-2 ensure that construction of the Project would result in less-than-significant impacts related to contaminated groundwater.

Soil Vapor Results

As discussed above, the Subsurface Investigation (Appendix G) included collecting soil gas samples to assess whether there could be a potential human health risk to future occupants of the Project through vapor intrusion. Laboratory analyses showed concentrations of tetrachloroethylene (PCE), trichloroethene (TCE), and benzene that exceed the screening levels for non-restrictive residential land uses. Benzene is a common additive to gasoline, and PCE is commonly used as a cleaning solvent by dry cleaners or machine shops. TCE is a breakdown product of PCE. Based on the reported Project Site's historical land uses, no on-site sources are suspected, as these contaminants are likely associated with an off-site source. Based on the laboratory results, the Subsurface Investigation Report also conducted a screening human health risk evaluation (HHRE) discussed below to assess the potential health risk to future occupants of the Project.

Human Health Risk Evaluation (HHRE)

The total non-cancer hazard for a typical receptor is presented as an estimated non-cancer hazard index (HI) and the total cancer risk for a receptor is presented as an estimated incremental lifetime cancer risk (ILCR). As indicated in the Subsurface Investigation Report prepared by HMC, for the Project, regulatory agencies such as the Los Angeles County Fire Department and DTSC typically accept a target ILCR of 10-5 (approximately 1 in 100,000) and HI of 1 for industrial/commercial properties. For properties with sensitive uses, such as schools, the target ILCR of 10-6 (approximately 1 in 1,000,000) is typically used. The HHRE was completed using conservative assumptions, exposure parameters, and other default values that tend to overstate risk.

The HHRE estimated that human health risks would exceed the target ILCR and HI based on both a commercial/industrial and sensitive use/residential building scenario. However, the subterranean parking garage, with its associated ventilation system, would reduce the potential for vapor intrusion into the new mixed-use building.[190]

Since the HHRE results are an overestimation of risk, indoor air samples were collected to determine whether an actual health risk would be presented to future occupants of the former church building. The results of the indoor air samples are discussed below.

Indoor Air Sampling Results

As the subterranean parking garage and associated ventilation system would reduce the potential risks for vapor intrusion for occupants, employees, and visitors related to the Project's future mixed-use building, indoor air sampling and testing was conducted to ascertain potential risks for visitors and employees related to the former church building that the Project would retain and repurpose for restaurant uses. On July 20, 2018, indoor air samples were collected within multiple existing buildings at the Project Site, including the existing classrooms and former church building to determine whether a health risk is present to future occupants due to vapor intrusion. Seven indoor air samples were collected from inside of the existing on-site buildings.

Following sample collection, the canisters were analyzed for VOCs in general accordance with EPA Method No. TO-15.[191] The concentration of these compounds were compared to the United States Environmental Protection Agency Region 9, Regional Screening Levels for residential (EPA- RSLr) and commercial/industrial air (EPA-RSLi) and the California Department of Toxic Substances Control, Human and Ecological Risk Office Note 3, Screening Levels for residential (DTSC-SLr) and industrial/commercial air (DTSC-SLi).[192] These are conservative regulatory screening levels for ambient indoor air at residential and industrial/commercial properties.

The indoor air sample results indicated no detectable concentrations of VOCs, with the exception of acetone detected in one indoor air sample. Acetone is a common chemical found in many household chemical products such as paint and nail polish. The detected acetone concentration of 0.058 micrograms per liter (µg/l) is well below the EPA-RSLr of 32 µg/l. The DTSC does not provide a screening level for acetone.[193]

Based on these results, there is a low likelihood of a health risk to future employees and visitors to the proposed restaurant uses on the Project Site as a result of vapor intrusion. Even so, the Project includes MM HAZ-3 to reduce any potential health risks related to vapor intrusion associated with the Project's repurposing of the former church building. MM HAZ-3 requires that all concrete cuts and utility penetrations into the former church building's foundation/slab that

[190] Subsurface Investigation Report, 3119 West 6th Street, Los Angeles, California (Subsurface Investigation Report) prepared by Hazard Management Consulting (HMC), dated September 20th 2018 (Appendix G).

[191] Subsurface Investigation Report, 3119 West 6th Street, Los Angeles, California prepared by Hazard Management Consulting (HMC), dated September 20th 2018

[192] Subsurface Investigation Report, 3119 West 6th Street, Los Angeles, California prepared by Hazard Management Consulting (HMC), dated September 20th 2018

[193] Subsurface Investigation Report, 3119 West 6th Street, Los Angeles, California prepared by Hazard Management Consulting (HMC), dated September 20th 2018

may occur due to the installation of subsurface piping for future water, sewer and other utilities be sealed to add an additional measure of protection against potential vapor intrusion.

Methane Testing Results

The Project Site has been identified by the LADBS to be within a "Methane Zone." These areas pose a risk of methane intrusion emanating from geologic formations. Due to the existing potential environmental risk associated with construction in a Methane Zone, the Project would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City of Los Angeles. Project development would be governed by the provisions of City of Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance. This ordinance provides installation procedures, design parameters and test protocols for methane gas mitigation systems. More specifically, the Methane Mitigation Standards ordinance includes requirements for site testing, methane mitigation systems, and ventilation systems. Site Design Levels are categorized as Level I through Level V, based on methane concentrations detected during testing.

Based on the results of the methane gas sampling conducted as part of the Subsurface Investigation Report (Appendix G), elevated concentrations of methane were detected exceeding the lower explosive (LEL) of 50,000 ppm. These results coincide with LADBS Level V Minimum Methane Mitigation Requirements. Per Chapter 71, the Project would be subject to the design and permitting requirements established by LADBS in LAMC Section 91.7102 for a Project Site located within a Methane Zone.

However, based on the design of the Project, which includes four levels of ventilated subterranean parking, the Subsurface Investigation Report concluded that there is a low likelihood that methane risk would be present and that, as a result, LADBS may wave the Level V Minimum Methane Mitigation requirement during plan check and development review. Compliance with City requirements in addition to the Project's development of four levels of ventilated subterranean parking at the Project Site would ensure that the Project would not result in reasonably foreseeable upset or accident conditions involving the release of existing methane gas into the environment. Therefore, potential impacts related to methane would be less than significant.

As described in Section 3, SCEA Criteria and Transit Priority Project Consistency Analysis, the Project has included all relevant mitigation measures related to hazards contained in the 2016 RTP/SCS PEIR. In addition to these applicable mitigation measures (such as SCAG 2016–2040 RTP/SCS Mitigation Measures MM HAZ-1(b), the Project would include Project-specific mitigation measures, MM HAZ-1, MM HAZ-2, and MM HAZ-3 listed below to further reduce potential impacts related to impacted soils, groundwater and vapor intrusion on the Project Site.

Mitigation Measures

> **MM HAZ-1:** A Site Specific Soil Mitigation Plan (SMP) will be prepared that will provide guidance to contractors for appropriate handling, screening, and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. These procedures will include training for construction

personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and disposal procedures.

The SMP will also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses and schools. In accordance with SCAQMD Rule 1166 requirements, impacted soil removed from the Project Site must comply with the following:

- Be transported to an approved treatment/disposal facility.
- When loading into trucks is completed, and during transportation, no excavated material will extend above the sides or rear of the truck or trailer.
- Prior to covering/tarping, loaded impacted soil must be wetted by spraying with dust inhibitors.
- The trucks or trailers must be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere.
- The exterior of the trucks (including the tires) must be cleaned off prior to the trucks leaving the excavation location and leaving the disposal site before returning to the Project Site.

MM HAZ-2: A Groundwater Management Plan (GWMP) will be prepared that includes training and protocol procedures to contractors for avoiding contact with groundwater during excavation and construction of the Project and appropriate disposal protocols of contaminated groundwater. The GWMP will include a requirement for development and implementation of a safety plan to be prepared prior to commencement of construction consistent with Occupational Safety and Health Administration (OSHA) Safety and Health Standards 29 CFR 1910.120 as well as management of groundwater produced through temporary dewatering activities. The safety plan will include necessary training, operating and emergency response procedures, and reporting requirements to regulate all activities that bring workers in contact with potentially contaminated groundwater. In the unlikely event that groundwater contamination occurs, the GWMP will include remedial efforts that may include batch extraction of groundwater using an on-site dewatering system or application of a chemical amendment, such as oxygen or hydrogen source depending on the type of contamination impact.

MM HAZ-3: All concrete cuts and utility penetrations into the building pad(s) or concrete slab(s) that underlie the former church building that may occur during the remodeling/repurposing of the existing school building will be sealed to add an additional measure of protection against potential vapor intrusion.

Conclusion:

Compliance regulatory requirements, SCAG 2016–2040 RTP/SCS Mitigation Measures, and mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 would ensure no significant construction related impacts related hazards would occur.

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 with Mitigation Incorporated. The school closest to the Project Site are the Young Oak Kim Academy LAUSD middle school located approximately 120 feet to the southwest. As discussed above under Items 5.9.a and 5.9.b, the Project includes MM HAZ-1, which requires Project construction activities to comply with SCAQMD Rule 1166 in order to control and minimize the risk associated with excavating, transporting and disposing of potentially impacted or impacted soils that may be encountered at the Project Site. Among other measures, MM HAZ-1 includes the preparation of an approved SMP that would provide guidance to contractors for appropriate screening, and management of potentially impacted or impacted soils that may be encountered during grading and excavation activities. The SMP would also include procedures for the safe handling and transportation of soils on the Project Site that may impact sensitive receptors such as schools.

As is also discussed above, construction of the Project would also involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. Thus, compliance with applicable regulations and incorporation of mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 potential risks of exposure to hazardous materials for the public or the environment, including schools due to Project construction would be less than significant.

The types of potentially hazardous substances and materials that would be used in association with the operation of the Project would include those typical of residential and commercial developments, such as small quantities of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. However, such substances and materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, operation of the Project would not create a significant risk of exposure to hazardous materials for the public or the environment, including schools.

Conclusion:

Compliance with applicable regulations and incorporation of mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 potential risks of exposure to hazardous materials for the public or the environment, including schools due to Project operations would be less than significant.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?

Less Than Significant with Mitigation Incorporated. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 refers to the preparation of a list, many changes have occurred related to web-based information access since 1992, and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database,[194] which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. GeoTracker is the State Water Resources Control Board's data management system[195] for managing sites that impact groundwater, especially those that require groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's database includes[196] lists of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board.

As part of the Phase I ESA (Appendix G), a search was conducted for available federal, State, and local environmental database records for the Project Site, and where practicable, adjoining properties and nearby properties and surrounding areas within 1 mile from the Project Site. According to the review of environmental database records, the Project Site is not listed on any regulatory databases.

As discussed above under Item 5.9.b, an adjacent property to the east was identified as previous service station and was identified in the GeoTracker database as a LUST release case; another adjacent property to the east was identified as an EDR Hist Cleaner, meaning that it had previously been an on-site dry cleaning establishment; an adjacent property to the southeast was identified as a EDR Hist Auto site, meaning that it had previously been for automotive uses and an adjacent property to the southwest (Young Oak Kim Academy) was listed on the RCRA-LQG, CA HAZNET databases as being a large quantity generator of potential hazardous waste.

The uses at these properties are summarized below:

- Shatto Investment Company located at 3151 West 6th Street is located 100 east of the Project Site and is listed on the CA SWEEP UST, CA FIDS, EDR Hist Auto, RCRA SQG and FINDS databases. The site was a previous service station and was

[194] https://www.envirostor.dtsc.ca.gov/public/ Accessed November 20 2018
[195] https://geotracker.waterboards.ca.gov/ Accessed November 20 2018
[196] https://calepa.ca.gov/database-and-directories/ Accessed November 20 2018

identified in the GeoTracker database as a LUST release case. The Project Site was identified by a research report as a potential off-site petroleum hydrocarbon source for elevated concentrations of TPH[g], benzene, MTBE, TBA and DIPE detected in off-site groundwater monitoring wells MW11 and MW12 situated to the east of a former gas station located at 3151 West 6th Street, Los Angeles, California. A review of EDR databases, Sanborn maps, LADPW NavigateLA website and agency records from LADBS, LAFD, and AQMD, concluded that the Project Site is unlikely to be a source. The Project Site is located up-gradient and to the east of 3151 West 6th Street. Based on 2008 and 2009 groundwater monitoring data, groundwater flows to the west-northwest. The research report identifies a service station formally located at 3033 West 6th Street, Los Angeles, California as the first potential source of off-site contamination. The former service station was located at the northeast corner of the intersection of West 6th Street and South Westmoreland Avenue, approximately 475 feet east of well MW11. The second possible source of off-site contamination is the 10,000-gallon gasoline tank that was formally located approximately 80 feet from 3119 West 6th Street, along the eastern portion of 523 Shatto Place (although no contamination was reported at the time of removal of the UST). Contaminates from well MW12 may have originated from this area.

- Based on the relative proximity of the plume to the subject property, the release from this unknown source has the potential to impact the subject property, which constitutes a REC.
- Mikes Cleaners and Tai located at 3107 West 6th Street, is located 100 feet to the east and up-gradient from the Project Site. This site is reported as an EDR Hist Cleaners site from 1986 to 2010, meaning that it had been listed as a cleaner during that period. However, no hazardous wastes and no releases were listed. Based on the lack of a documented release and the relative lineal distance to the Project Site, the review of regulatory agency files for this listing was not deemed necessary, and the Phase I ESA concludes that this listing is not expected to represent a significant environmental concern.
- Sixth Westmoreland, located at 3100 West 6th Street is reported as an EDR Hist Auto site. Based on the lack of a reported release and its distance to the Project Site, the Phase I ESA concludes that this listing is not expected to represent a significant environmental concern.
- Central Region Middle School No. 3 (Young Oak Kim Academy) at 615 Shatto Place is located to the southwest of the Project Site. This site was identified in the RCRA-LQG and CA HAZNET as having a large quantity generator. Based on the lack of a documented release and the relative distance to the Project Site, the review of regulatory agency files for this listing was not deemed necessary, the Phase I ESA concludes that this listing is not expected to represent a significant environmental concern.

As discussed above under Item 5.9.b, a Subsurface Investigation Report (Appendix G) was conducted to investigate the potential impacts to groundwater and soil beneath the Project Site and the potential impacts of vapor intrusion.

While the Project Site is not currently listed, on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, potential impacts related to soils, groundwater and soil vapor exist on the Project Site. The Subsurface Investigation Report indicated that soil

testing results indicated soils greater than approximately 20 feet bgs in the southern portion of the Project Site had a strong petroleum hydrocarbon odor and PID readings of greater than 50 parts per million (ppm) of VOCs. As a result, during excavation, these soils would need to be monitored using a SCAQMD Site Specific Mitigation Plan and would be disposed of appropriately. The SCAQMD Site Specific Mitigation Plan includes protocols for ongoing testing and appropriate separation and disposal of VOC contaminated soils. The Project would also include MM HAZ 1, which would include a Soil Management Plan (SMP). The SMP would provide safety guidance to contractors for on the appropriate screening and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. Compliance with regulatory requirements and incorporation of MM HAZ 1, would reduce potential soil hazards to less than significant.

Laboratory results of groundwater testing indicated elevated concentrations of gasoline and gasoline constituents, such as benzene and toluene, with lesser concentrations in the northern portion of the Project Site consistent with the general distribution of gasoline products documented in the off-site LUST case. To minimize the risk from contacting and contaminating groundwater during construction, the Project would include MM HAZ-2, which would include a GWMP. Compliance with regulatory requirements and incorporation of MM HAZ 2, would reduce potential groundwater hazards to less than significant.

Although the indoor air sample results indicated a low likelihood of a health risk to current and future occupants of the Project Site as a result of vapor intrusion, to minimize any risk the Project would include MM HAZ-3, that requires that all concrete cuts and utility penetrations on the former building's foundation/slab to be sealed to prevent potential vapor intrusion. Incorporation of MM HAZ-3, would ensure potential soil vapor hazards would be less than significant.

Furthermore, the Project would not contain uses that would exacerbate existing environment conditions.

Conclusion:

Compliance with applicable regulations and incorporation of mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 impacts with respect to hazardous materials lists, including Government Code Section 65962.2, would be reduced to less than significant.

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

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of a public or private airport. The nearest airports are the Hollywood Burbank Airport, Hawthorne Municipal Airport and Los Angeles International Airport (LAX), located approximately 9.8, 9.4, and 10.5 miles from the Project Site, respectively. As such, the Project Site is not located within the vicinity of a private airstrip. Therefore, the Project would not result in an airport-related safety

hazard for people residing or working in the Project area and would not expose people residing or working in the Project area to excessive noise levels from such uses.

Conclusion:

No impact would occur and no mitigation is required.

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

Less Than Significant Impact With Mitigation Incorporated. The Project Site is located in an established urban area that is well served by an existing roadway network. As shown in the City of Los Angeles General Plan Safety Element, Critical Facilities and Lifeline Systems, Western Avenue and Beverly Boulevard are the closest Selected Disaster Routes that could be utilized during a disaster event.[197] These streets are also identified as disaster routes per the Los Angeles County Department of Public Works.[198] While it is expected that the majority of the Project's construction activities would be confined on-site, some construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, in accordance with City of Los Angeles requirements, the Project would include MM TRAF-1, which requires the development of a Construction Management Plan to ensure that adequate emergency access is maintained and that through-access for drivers, including emergency personnel, along all roads would still be provided during construction. Therefore, Project construction would not result in inadequate emergency access.

Project operation would generate traffic in the Project Site vicinity and would result in some modifications to access to the Project Site from the streets that surround it. However, adequate emergency access to the Project Site and to the surrounding area would continue to be provided. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project Site access and circulation plans would be subject to review and approval by the Los Angeles Fire Department (LAFD). For these reasons, construction and operation of the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Conclusion:

Compliance with existing regulations, and MM TRAF-1 would ensure that implementation of the Project would not impair or physically interfere with adopted emergency response plans or emergency evacuation plans. Therefore, impacts related to emergency response plans and emergency evacuation plans are less than significant.

[197] City of Los Angeles General Plan Safety Element Exhibit H, Critical Facilities and Lifeline Systems, November *26,* 1996.

[198] https://dpw.lacounty.gov/dsg/DisasterRoutes/ Accessed October 9, 2018.

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

No Impact. The Project Site is currently developed and located in a highly urbanized area, and does not contain wildland features. Therefore, development of the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Conclusion:

No impacts would occur in this regard and no mitigation is required.

Cumulative Impacts: Hazards and Hazardous Materials

Like the Project, many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. Such related projects would be required to use, store, remove and/or transport all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, or handling of hazardous materials, and that their development would not result in the release of existing ACBMs, LBPs, radon gas, or PCBs. Some of the related project may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, each related project would be required to comply with existing Federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators. Some of the related projects also would be constructed within Methane Zones.

Like the Project, related projects in the Project Site area located within Methane Zones would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City of Los Angeles and would reduce impacts with respect to releases or accidents related to methane gas to less than significant. Some of the related projects may also include the use of hazardous materials within 0.25 mile of a school. However, related projects would be subject to environmental review to evaluate potential impacts from hazardous materials releases within 0.25 mile of a school, reducing impacts to less than significant.

Related projects are all located highly urbanized areas, would not contain wildland features, and are not located adjacent to any wildland areas. Therefore, development of related projects would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

As discussed above, prior to commencing construction activities, the Project would comply with regulatory requirements by investigating and removing or remediating any existing contamination or hazards risks at the Project Site, including, without limitation, due to ACBMs, LBPs and methane gas. The Project would also address anticipated contaminated soils below 20 feet bgs and contaminated groundwater, and potential vapor intrusion.

Conclusion:

The Project's contribution to cumulative hazards and hazardous materials impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

5.10 Hydrology and Water Quality

The following impact analysis pertaining to hydrology and water quality includes information on the existing and proposed topography/drainage and infrastructure for the Project Site prepared by Brandow & Johnston, Inc. These are included in Appendix H of this SCEA.

Would the project:

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

Less Than Significant with Mitigation Incorporated. The approximately 1.17-acre (pre-dedication) Project Site is currently developed with school related buildings, and surface parking. The Project Site generally slopes southwest toward the intersection of Shatto Place and 6th Street at a rate of about 1.2 percent. There are on-site inlets for drainage that currently curb drain to Shatto Place. There is not an existing storm drain system along the adjacent City streets.

Construction

Construction of the Project would involve earthwork activities, including excavation and grading of the Project Site. During precipitation events in particular, construction activities associated with the Project have the potential to result in soil erosion particularly during grading and soil stockpiling, subsequent siltation, and conveyance of other pollutants into municipal storm drains. In addition, as discussed above in Item 5.9, *Hazards and Hazardous Materials*, groundwater was encountered at a depth of 38 to 43 feet bgs. The Project would excavate to a depth of approximately 60 feet. Therefore, a program of construction dewatering may be required in order to allow the excavation and installation of the subgrade parking.

As is also described above in Item 5.9, *Hazards and Hazardous Materials*, with respect to groundwater, dewatering, treatment, and disposal of groundwater would be conducted in accordance with the permit requirements set forth in the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater discharges. In addition, to minimize potential hazards associated with potentially impacted or impacted soils and related to contacting contaminated groundwater during construction, the Project would include MM HAZ-1 and MM HAZ-2. MM HAZ-1 would include requirements that would ensure that potentially impacted or impacted soils would be identified, properly handled and properly transported off-site to a landfill qualified to receive them. MM HAZ-2 would include the development of a Groundwater Management Plan (GWMP), which would include training and protocol procedures for contractors to avoid contact with groundwater during excavation and construction of the Project. The GWMP will include a requirement for development and implementation of a safety plan to be prepared prior to commencement of

construction consistent with Occupational Safety and Health Administration (OSHA) Safety and Health Standards 29 CFR 1910.120 as well as management of groundwater produced through temporary dewatering activities. The safety plan will include necessary training, operating and emergency response procedures, and reporting requirements to regulate all activities that bring workers in contact with potentially contaminated groundwater. In the unlikely event that groundwater contamination occurs, the GWMP will include remedial efforts that may include batch extraction of groundwater using an on-site dewatering system or application of a chemical amendment, such as oxygen or hydrogen source depending on the type of contamination impact.

With respect to erosion and sedimentation, Project construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to avoid or reduce the effects of sedimentation and erosion. In addition, the Project would require approval of an erosion control plan and would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the NPDES permit. The SWPPP incorporates best-management practices (BMPs) in accordance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities to control erosion including grading and dust control measures.

For any grading projects occurring during the rainy season (October 1st to April 14th), a Wet Weather Erosion Control Plan (WWECP) is required pursuant to the City of Los Angeles Board of Public Works (BPW).[199] The WWECP addresses water pollution control from grading activities during the wet weather season by specifying the use of appropriate temporary erosion and sediment control BMPs. Compliance with the City of Los Angeles requirement to prepare a WWECP would ensure that impacts to water quality during the rainy season would be less than significant.

Operation

The Project will be designed to comply with the City of Los Angeles's Low Impact Development (LID) design standards.[200] The Geotechnical Reports prepared for the Project indicates that on-site stormwater disposal is not considered feasible for the Project Site due to the property line-to-property line extent of the proposed structure and the recommendation by this firm to support the proposed structure directly on the non-water-bearing bedrock. In addition, the Geotechnical Reports discovered groundwater that would conflict with the proposed depth of the basement level.[201] To facilitate compliance with the City's LID designs, the Project's Best Management Practice (BMP) would include rainwater harvesting and/or bio-infiltration flow-through planters. The entirety of the new mixed-use building's roof drains would be diverted via rainwater

[199] City of Los Angeles Department of Public Works Bureau of Contract Administration, Wet Weather Erosion Control Plan. https://bca.lacity.org/uploads/safety/WWEC%20Manual%20for%20website%202009.pdf Accessed November 25, 2018.

[200] City of Los Angeles Planning and Development Handbook for Low Impact Development. https://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf. Accessed November 25, 2018.

[201] Geotechnologies, Incorporated, Geotechnical Engineering Investigation Proposed Mixed-Use Development and Repurposing of Existing Church, 550 Shatto Place, Los Angeles, California, January 24, 2019 and Environmental Impact Report, Soils and Geology Issues, Proposed Mixed Use Development, 3119 West 6th Street, Los Angeles, California (Geotechnical Report), prepared by Geotechnologies Incorporated, dated July 20, 2018.

harvesting and/or bio-infiltration flow-through planters and the overflow discharge would be discharged to Shatto Place and 6th Street via a curb drain or parkway drain.

The design of structural BMP(s) would be in accordance with the City of Los Angles Development Best Management Practices Handbook, Part B Planning Activities[202], which summarizes the City's review and permitting process, identifies stormwater mitigation measures, and references source and treatment control BMP information. The final selection of any BMPs would be made through coordination with the City of Los Angeles.

Conclusion:

Compliance with the applicable groundwater regulatory requirements and the Project's incorporation of mitigation measure MM HAZ-1 and MM HAZ-2 would ensure impacts to surface or groundwater quality would be less than significant.

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

Less Than Significant Impact. The Project Site is located in the northern edge of the Central Groundwater Basin. The Basin covers approximately 270 square miles and is bordered on the north by the Santa Monica Mountains and to the north and east by the Elysian Hills.

The Project Site is located in a highly urbanized area of Los Angeles and is currently developed with four school-related buildings and a surface parking lot. As such, the site does not currently provide a substantial opportunity for recharge of groundwater. As discussed in the Subsurface Investigation Report, prepared for the Project (Appendix G), based on borings conducted at the Project Site, groundwater was encountered at the Project Site at 33 to 43 feet bgs and, based on sampling, is contaminated. The Project does not propose the development of long-term groundwater production wells.

Construction

As discussed above, during construction, groundwater may be encountered, and a program of construction dewatering may be required in order to allow the excavation and installation of the subgrade parking. The dewatering would continue throughout the construction, but permanent dewatering would not occur. Construction of lower subterranean parking levels would be designed to protect against the potential adverse impacts of the water. The Project would be designed for hydrostatic pressures in lieu of a permanent dewatering system.

Given the size of the Project Site, at approximately 1.17 acres, and the temporary nature of construction activities, while some dewatering could be necessary during construction activities, such dewatering activities would be temporary and would not be of an extent that would

[202] City of Los Angeles Planning and Development Handbook for Low Impact Development. https://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf. Accessed November 25, 2018.

substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the Project would impede sustainable groundwater management of the basin.

Operation

Operation of the Project would decrease the amount of impervious surface area on the Project Site from 98 percent under existing conditions to 94 percent after development is completed. This would create a negligible increase in the opportunity for potential increases in recharge. Therefore, the proposed building and paved surfaces would not substantially deplete groundwater supplies nor interfere with groundwater recharge. With implementation of City of Los Angeles LID requirements, including those described in the discussion under Item 5.10.a), above, impacts with respect to the decrease of the groundwater supplies, or interference with groundwater recharge would be less than significant.

Conclusion:

With compliance with existing regulatory compliance measures, the Project's construction activities and operations would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts on groundwater would be less than significant, and no mitigation measures are required.

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

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

Less Than Significant Impact. There is no existing storm drain system in the adjacent public streets. The Project Site does not contain a stream or river. Within the Project Site there are on-site inlets for stormwater drainage that currently drain directly onto Shatto Place. The existing Project Site is 98 percent impervious, resulting in a drainage volume of 4,244 cf for an 85th Percentile storm.[203] Based on a 50-year storm event, the existing peak discharge is 3.38 cf per second.[204]

As discussed in Item 5.10.a), above, the Project would be designed to comply with the City of Los Angeles's LID design standard. The proposed stormwater BMPs would require rainwater harvesting and/or bio-filtration flow-through planters, and the entirety of the building's roof drains will be diverted to the proposed stormwater BMPs and the overflow discharge will be discharged to Shatto Place and 6th Street via a curb drain or parkway drain.

[203] A percentile rainfall event represents a rainfall amount which a certain percent of all rainfall events for the period of record do not exceed. For example, the 85th percentile rainfall event is defined as the measured rainfall depth accumulated over a 24-hour period, for the period of record, which ranks as the 85th percentile rainfall depth based on the range of all daily event occurrences during this period.

[204] Civil Report Memorandum. Brandow & Johnston, Inc. October 2018.

The Project would have an impervious area percentage of 94 percent, which represents a decrease of four percent from existing conditions. The associated drainage volume would be 2,152 cf with incorporation of the stormwater BMP. The 50-year storm event peak discharge would remain at 3.38 cf per second.[205]

Therefore, compared to the existing drainage volume of 4,244 cf for an 85th Percentile storm, the Project would reduce the overall stormwater runoff to 2,152 cf. Further, Project construction would comply with applicable NPDES and City requirements including those requiring the preparation of a Project-specific Stormwater Pollution Prevention Plan (SWPPP). Pursuant to the City's LID Ordinance, the Project would be required to capture and manage the first three-quarters of an inch of runoff flow during storm events as defined in the City's BMPs. As described earlier, the rainwater harvesting and/or bio-filtration flow-through planters would meet the City of Los Angeles' stormwater capture and reuse criteria and LID design standards.

Conclusion:

The Project would result in less than significant impacts associated substantial erosion or siltation on-or off-site and no mitigation is required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite;

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. As discussed above, the Project would increase the Project Site's permeability and would, thus, decrease surface water runoff which would result in flooding on-or offsite or exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The City Los Angeles Bureau of Engineering requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. Dewatering, treatment, and disposal of groundwater would be conducted in accordance with permitted requirements set forth by the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit includes groundwater discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater discharges. In addition, the Project would include appropriate on-site drainage improvements to accommodate anticipated stormwater flows. With implementation of the Project, rainwater harvesting and/or bio-filtration flow-through planters would be provided and the overflow discharge would be discharged to Shatto Place and 6th Street via a curb drain or parkway drain. Similar to existing conditions, operation of the Project's uses would discharge pollutant constituents commonly associated with urban uses into surface water runoff. However, required water quality control measures would be implemented as described in Item 5.10.a. Therefore, the

[205] Civil Report Memorandum. Brandow & Johnston, Inc. October 2018.

Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, result in on or off-site flooding, or provide substantial additional sources of polluted runoff.

Conclusion:

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

iv. Impede or redirect flood flows?

No Impact. According to the City of Los Angeles General Plan Safety Element, the Project Site is not located with a 100-Year or 500-Year flood plain. The Project is a mixed-use project that would not redirect or cause impediment or redirection of flood flows.

Conclusion:

No impact would occur in this regard and no mitigation measures are required.

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

No Impact. According to the City of Los Angeles General Plan Safety Element, the Project Site is not located with a 100-Year or 500-Year flood plain.[206] A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank.[207] A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of the sea floor associated with large, shallow earthquakes.[208]

The Project Site is located approximately 12 miles east of the Pacific Ocean and is not shown to be located within a tsunami hazard area in the Los Angeles General Plan Safety Element.[209] In addition, the Project Site is not located within the proximity of an enclosed body of water. The nearest enclosed body of water is MacArthur Park Lake, located 0.73 miles southeast of the Project Site and surrounded by intervening development. The Project Site is also at a higher elevation (272 feet above mean sea level [MSL]) than MacArthur Lake (260 feet MSL), and therefore, the Project Site is not downstream of the water body.

As such, the Project is not in a flood hazard, tsunami, or seiche zone and there is no potential for risk of the release of pollutants due to project inundation.

Conclusion:

No impacts would occur under the Project.

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206 City of Los Angeles General Plan, Safety Element Exhibit F, 100-Year & 500-Year Floodplains, March 1994.

207 USGS Seismic Seiches. https://earthquake.usgs.gov/learn/topics/seiche.php.

208 National Ocean Service. What is a Tsunami? https://oceanservice.noaa.gov/facts/tsunami.html.

209 City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.

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

Less Than Significant Impact. Under the California Water Code, the State of California is divided into nine regional water quality control boards (RWQCBs), which govern the implementation and enforcement of the California Water Code and the Clean Water Act. The Project Site is located within Region 4, also known as the Los Angeles Region, (LARWQCB). The LARWQCB Water Quality Control Plan: *Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, September 11, 2014, is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations.

Under the NPDES permit enforced by the LARWQCB, all existing and future municipal and industrial discharges to surface waters within the City of Los Angeles are subject to applicable local, State and/or federal regulations. The Project must comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the LARWQCB.

The Project would comply with and not obstruct implementation of the LARWQCB Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. As described earlier, the Project would comply with the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater discharges. The Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and in the City's LID ordinance. Project construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to avoid or reduce the effects of sedimentation and erosion. In addition, the Project would require approval of an erosion control plan and would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the NPDES permit. The SWPPP incorporates best-management practices (BMPs) in accordance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities to control erosion including grading and dust control measures.

Conclusion:

The Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts: Hydrology and Water Quality

The related projects would potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff within the local vicinity of the Project Site. Pursuant to the City's LID Ordinance, however, related projects would be required to capture and manage the first three-quarters of an inch of runoff flow during storm events as defined in the City's LID BMPs, through one or more of the City's preferred LID improvements: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible.

Further, the related projects would be subject to the NPDES permit requirements for both construction and operation. Each project greater than one-acre in size would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid or minimize impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available.

The cumulative impacts context for flood hazards is the corporate boundary of City of Los Angeles, which provides emergency response services for flood events and participates in the National Flood Insurance Program (NFIP). The NFIP is a Federal program enabling property owners in participating communities to purchase protection against property losses due to flooding.

All related projects are subject to restrictions and requirements as part of the City's existing permitting process and a detailed review of the City of Los Angeles General Plan Safety Element would be conducted as part of the plan check process. Related projects within the 100-year flood plain or floodway would be required to implement appropriate flood plain management measures in the design of new buildings. Compliance with these existing regulatory requirements would ensure the any related projects would not place housing within a flood hazard area without incorporating proper measures and reducing this impact to less than significant and would not be cumulatively considerable.

Similarly, the Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and in the City's LID ordinance. The Project would generate less surface runoff than under existing conditions. In addition, the Project would include rainwater harvesting and/or bio-infiltration flow-through planters as a BMP and would include MM HAZ-2 which would include a GWMP that would minimize any potential contamination to groundwater during construction of the Project. The Los Angeles Department Public Works would review the Project to ensure that sufficient local and regional drainage capacity is available. The Project would not be located in a 100-Year or 500-Year flood plain or near an inundation area subject to seiche, tsunami, or mudflow.

Conclusion:

The Project's contribution to cumulative impacts to hydrology and water quality and flooding hazards would not be cumulatively considerable. Impacts would be less than significant.

5.11 Land Use and Planning

Would the project:

a. Physically divide an established community?

No Impact. The Project Site is currently developed with school-related buildings and a surface parking lot. The Project Site vicinity is highly urbanized and generally built out. The local vicinity is characterized by a blend of commercial, residential, office, schools, and government facilities. The Project would provide a new mixed-use development that would include residential uses and ground floor office uses. The Project would also involve the repurposing of the existing church building, currently used for school purposes, into restaurant uses. As such, the Project would be an infill project providing uses in keeping with the mixed-use character of the surrounding area. Given the type of uses in the Project Site vicinity, and the infill character of the Project, it would not physically divide an established community. The Project would not disrupt or divide an established community through a change in street or land use patterns on surrounding streets.

Thus, given the existing mix of uses in the Project Site vicinity and the location of the Project Site within an existing developed Site, the Project would not physically divide, disrupt, or isolate an established community.

Conclusion:

No impact would occur and no mitigation measures are required.

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

Less Than Significant Impact. As discussed below, the Project would be substantially consistent with all of the applicable plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Sites. Therefore, Project impacts related to land use and planning would be less than significant and no mitigation measures are required.

Southern California Association of Governments

SCAG is the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

SCAG Regional Comprehensive Plan

SCAG has prepared the 2008 Regional Comprehensive Plan (2008 RCP) in response to SCAG's Regional Council directive in its 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced the Regional Comprehensive Plan and Guide (RCPG) for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the 2016-2040 RTP/SCS (discussed below).

SCAG 2016-2040 RTP/SCS

On September 30, 2008, SB 375 was passed to help achieve AB 32 goals related to the reduction of greenhouse gases through regulation of cars and light trucks. 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.109 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 MPOs to prepare an SCS within the 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.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035. For the area under SCAG jurisdiction, including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035. On February 15, 2011, CARB's Executive Officer approved the final targets.

On April 7, 2016, the Regional Council of SCAG adopted the 2016-2040 RTP/SCS. For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region's residents and visitors. The 2016-2040 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the

NAAQS as set forth by the Federal Clean Air Act. As such, the 2016-2040 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2016-2040 time-frame and clear steps to move toward this objective. This is especially critical for the goods movement system. The development of a world-class, zero- or near-zero-emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The 2016-2040 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, GHG emissions reduction, and economic development.

The 2016-2040 RTP/SCS provides a blueprint for improving quality of life for residents by providing choices for where they will live, work, and play, and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its residents by 2040. More importantly, the 2016-2040 RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and array of open spaces for future generations.

The 2016-2040 RTP/SCS also includes examples of measures that could reduce impacts from planning, development, and transportation. It notes, however, that the example measures are not intended to serve as any kind of checklist to be used on a project-specific basis. Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

A detailed discussion of the Project's consistency with the 2016-2040 RTP/SCS is included in Section 3, SCEA Criteria and Transit Priority Project Consistency Analysis. As discussed there, the Project would be substantially consistent with the applicable 2016-2040 RTP/SCS policies and with the land use designation, density, and building intensity identified in the 2016-2040 RTP/SCS for the area in which the Project Sites are located. Therefore, no significant impacts regarding consistency with this plan would occur.

The Project would be substantially consistent with 2016 RTP/SCS goals to improve regional economic development, maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, maximize the productivity of the transportation system, protect the environment, encourage energy efficiency, and facilitate the use of alternative modes of transportation. In addition, as discussion in Item 5.8, *Greenhouse Gas Emissions*, the Project would accommodate increases in population, households, employment, and travel demand by implementing smart land use strategies. The Project Site is an infill location close to jobs, off-site housing, and services and in close proximity to existing and future public transit stops, which would result in reduced VMT. Also, as discussed in Item 5.14, *Population and Housing*, the Project's contributions to growth fall within the range of

growth accounted for in the SCAG projections that are used for future planning activities and provision of services. These projections include development that is anticipated over a horizon period that extends to 2040. The projections are revised on four-year intervals so as to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in timely fashions so long as the growth does not exceed the amount anticipated within the service timelines. Growth at specific sites may vary while the overall growth patterns are sufficient for planning purposes.

Los Angeles General Plan Framework Element

Adopted in December 1996, and readopted in August 2001, the City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan.[210] The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through community plans and specific plans. The General Plan Framework sets forth a conceptual relationship between land use and transportation and encourages new development to be developed near transit. The Framework Element also calls for commercial development along the City's arterial corridors to be intensified with new projects that integrate commercial and residential uses.

As discussed in greater detail below in **Table 5-18**, *Comparison of the Project to the Applicable Land Use Policies of the Framework Element*, the Project would be substantially consistent with applicable objectives, goals, and policies, of the General Plan Framework. In particular, the Project would be substantially consistent the Framework Element as follows:

- The Project would be substantially consistent with objectives of Chapter 4 on Housing by providing 256 new dwelling units in a mix of unit sizes (studios, one-bedroom, two-bedroom, and three-bedroom units) and affordability levels, including 29 units restricted to Extremely Low Income households. In addition, the Project would be substantially consistent with the multiple objectives of locating new multifamily housing in proximity to transit, and to provide adequate buffers between higher intensity uses and adjacent residential neighborhoods. The Project's 256 units, would create a notable increase in housing stock, including 29 housing units that can meet the needs of Extremely Low Income residents.
- The Project would provide its mix of uses in proximity to a broad range of land uses and transit options within walking distance, which would stimulate non-vehicular modes of travel, including pedestrian and bicycle activity. The Project would be integrated with the surrounding area through new ground level office commercial uses and amenities, including new street trees, a plaza, and landscaping.
- The Project Site is located within a Los Angeles State Enterprise Zone and a City-identified Transit Priority Area, and would meet the objectives of the land use, economic and housing policies of the General Plan Framework to provide a diversity of uses, including restaurants, commercial, residential uses (including affordable

[210] City of Los Angeles Framework Element of the General Plan. https://planning.lacity.org/cwd/framwk/fwhome0.htm, Accessed November 21, 2018.

housing), in proximity to transit. The Project's mixed uses would support the General Plan Framework's land use, economic and housing goals to enhance urban lifestyles with proximity to services, retail, and transit.

Because the Project would support and not conflict with the General Plan Framework land use goals, policies and objectives as shown above and in Table 5-18, impacts with respect to the Framework would be less than significant.

TABLE 5-18
COMPARISON OF THE PROJECT TO THE APPLICABLE LAND USE POLICIES OF THE FRAMEWORK ELEMENT

Policy	Analysis of Project Consistency
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability; revitalization of economically depressed areas, preservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.	**Consistent.** While it is the City's responsibility to meet this goal in general, the Project's introduction of new residential, office, and commercial uses would provide new services, employment as well and new housing opportunities that would serve a variety of income levels. As no housing currently exists on the Project Site, the Project would provide a substantial increase in new housing units in the vicinity. Specifically, the Project would provide 256 residential units and of these units, 29 units, or approximately 11 percent of the total number of dwelling units, would be designated as restricted affordable housing for Extremely Low Income households. Project vehicle trips and VMT would be reduced by including a mixture of land use on the Project Site and locating the Project in an urban, mixed-use area near surrounding commercial, residential, office and institutional uses. Furthermore, residents, visitors, and employees would have ready access to multiple nearby transit options which include the Wilshire/Vermont Metro Rail Metro Station which serves the Metro Purple Line and the Metro Red Line and multiple Metro bus lines.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, VMT, and air pollution.	**Consistent.** While it is the City's responsibility to meet this objective in general, the Project would be developed at an urban, infill site in close proximity to existing residential uses, businesses, services, and numerous public transportation options. Specifically, the Project Site is less than 500 feet from the Wilshire/Vermont Metro Rail Station which serves the Metro Purple Line and the Metro Red Line. The Project Site is also in close proximity to several bus lines including Metro Lines 18, 51, 52, 201, 204, and 351 and the Wilshire Center/Koreatown DASH line. The new residential population would have access to commercial and office development onsite as well as retail, restaurant, and other services within walking distance.
Objective 3.4: Encourage new multifamily residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**Consistent.** While it is the City's responsibility to meet this objective in general, the Project would provide new residents, jobs and services within close proximity of pedestrian, roadway and transit networks. The new residential population would have access to commercial and office development on-site as well as a considerable amount of retail, restaurant, and public services activities within walking distance and via bus and rail services. The Project would provide housing opportunities outside of existing (and particularly single-family) neighborhoods, thereby helping to preserve those neighborhoods.

Policy	Analysis of Project Consistency
Housing	
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 subregion to meet the projected housing needs by income level of the future population to the year 2010. **Objective 4.2:** Encourage the location of new multifamily housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**Consistent.** No housing is currently located on the Project Site. The Project would provide 256 new housing units to assist in meeting housing needs established in the periodically updated SCAG RHNA as implemented through the Housing Element of the General Plan. The new units would include a range of sizes from studios to three bedrooms. Of the 256 units, 29 units would be restricted for Extremely Low Income households. Therefore, the Project would provide a notable increase in housing stock including housing for Extremely Low Income residents in the City. The Project's residential units would be provided in close proximity to several transit options. The Project would be located within a dense mixed use area, with similar uses as the Project.
Economic Development	
Objective 7.6: Maintain a viable retail base in the City to address changing resident and business shopping needs.	**Consistent.** While it is the City's responsibility to meet this objective in general, the Project would include 12,800 sf of restaurant uses open to the public that would complement nearby commercial, office, service, and residential uses.
Policy 7.2.2: Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.	**Consistent.** While it is the City's responsibility to meet this policy in general, the Project would provide new mixed-use development in an area served by multiple bus lines and is close to the Wilshire/Vermont Metro Station. Commercial uses would be oriented to public streets with commercial uses rather than residential neighborhoods.

SOURCE: ESA, 2018.

Wilshire Community Plan

Adopted in 2001 and last amended in 2016, the Wilshire Community Plan identifies and established goals and polices for land use within the Wilshire Community Plan Area.[211] As discussed in greater detail below in **Table 5-19**, *Comparison of the Project to the Applicable Land Use Policies of the Wilshire Community Plan*, the Project would be consistent with applicable objectives and policies of the Wilshire Community Plan. In particular, the Project would be consistent the Wilshire Community Plan as follows:

- The Project would be substantially consistent with goals and policies that aim to provide a balance of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, VMT, and air pollution. The Project's mixture of commercial, office, and residential development would be developed at an infill location in close proximity to transit and surrounding residential, commercial, services and public facilities, which would help reduce vehicle trips and trip lengths, and associated GHG and air pollutant emissions, generated by the Project.
- The Project would provide neighborhood-serving commercial uses that would front 6th Street and Shatto Place, both of which are existing mixed-use commercial

[211] City of Los Angeles Wilshire Community Plan. https://planning.lacity.org/complan/pdf/wilcptxt.pdf Accessed November 20, 2018.

corridors. The new on-site commercial development could be readily accessed by the Project's new residential population without the need for vehicular travel, and by the surrounding neighborhood via walking, bicycling or bus or rail services. The Project would be substantially consistent with goals and objectives that aim to locate neighborhood-serving commercial facilities along commercial corridors and near existing neighborhoods.

- The Project would include 256 new housing units, including studio, one-bedroom, two-bedroom, and three-bedroom units, with substantial resident amenities. The Project would include market rate units and 29 units affordable to Extremely Low Income households. The Project would be substantially consistent with objectives and policies that aim to provide housing of types, sizes, and densities required to satisfy the varying needs and desires of all segments of the community's population.

Because the Project would not conflict with the Wilshire Community Plan goals, policies and objectives as shown above and by Table 5-19, impacts with respect to consistency with the Wilshire Community Plan would be less than significant.

TABLE 5-19
COMPARISON OF THE PROJECT TO THE APPLICABLE LAND USE POLICIES OF THE WILSHIRE COMMUNITY PLAN

Goal/ Policy/Objective	Analysis of Project Consistency
Residential	
Objective 1-1: Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010.	**Consistent.** The Project would provide a range of new housing units that would be affordable to a number of income levels. The Project would include 256 new housing units, including studio, one-bedroom, two-bedroom, and three-bedroom units, with substantial resident amenities. The Project would include market rate units and 29 units affordable for Extremely Low Income households.
Policy 1-1.2: Provide for adequate Multiple Family residential development.	
Policy 1-1.4: Provide for housing along mixed-use boulevards where appropriate.	**Consistent.** The Project is located in an urban mixed-use area at the corner of tow mixed-use corridors (Shatto Place and 6th Street); close to nearby commercial, residential, office, institutional, and service uses.
Objective 1-2: Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.	**Consistent.** The Project would be developed at an urban, infill Project Site in close proximity to existing residential uses, businesses, services, and numerous public transportation options. Specifically, the Project Site is less than 500 feet from the Wilshire/Vermont Metro Rail Station which serves the Metro Purple Line and the Metro Red Line. The Project Site is also close to several bus lines including Metro Lines 18, 51, 52, 201, 204, and 351 and the Wilshire Center/Koreatown DASH line. The new residential population would have access to commercial and office development onsite as well as retail, restaurant, and other services within walking distance.
Policy: 1-4.1: Promote greater individual choice in type, quality, price and location of housing.	**Consistent.** The Project would provide 256 new housing units in range of sizes including studios, one-bedroom, two-bedroom, and three-bedroom units including townhomes. Of the 256 units, 29 units would be restricted for Extremely Low Income households. As such, the Project would promote a range of housing options for different income levels.

Goal/ Policy/Objective	Analysis of Project Consistency
Commercial	
Objective 2-1: Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.	**Consistent.** The Project would be a mixed-use development with ground floor commercial uses and amenities, landscaping and would include a public plaza. The new commercial development is in the Koreatown neighborhood; an urban, mixed-use area that has numerous established commercial businesses. The Project would provide new residents, jobs and services close to pedestrian, roadway and transit networks. The new residential population and surrounding neighborhood would have access to the on-site commercial development well as surrounding commercial uses and services uses within walking distance and via bus and rail services.
Policy 2-1.1: New commercial uses should be located in existing established commercial areas or shopping centers.	
Transportation	
Objective 11-2: Promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers.	**Consistent.** The Project would provide its mix of uses in proximity to a broad range of land uses and transit options within walking distance, which would stimulate pedestrian activity. The Project would be integrated with the surrounding area through new ground level office, commercial uses and amenities, including new street trees, a plaza, and landscaping.
Goal 12: Encourage alternative modes of transportation to reduce single-occupancy trips.	**Consistent.** Project Site is served by a network of regional transportation facilities providing connectivity to the larger metropolitan area. The Project would be developed an infill location in close proximity to by multiple bus lines and in close proximity to the Wilshire/Vermont Metro Rail Station. The Project would be a mixed-use development that would enhance the pedestrian environment that includes ground floor commercial and office uses and amenities, a pedestrian plaza, street trees and landscaping.

SOURCE: ESA, 2018.

Los Angeles General Plan Housing Element

The Housing Element of the General Plan is prepared and updated pursuant to State law and provides planning guidance in meeting the housing needs identified in SCAG's RHNA.[212] The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods. The 2013–2021 Housing Element, an update to the previous 2006–2014 Housing Element that is based on the updated 2012 RHNA, was adopted by the City Council on December 3, 2013. Policies of note include Policy 1.1.3, which states the City should "[f]acilitate new construction and preservation of a range of housing types that address the particular needs of the city's households." Also, Policy 1.1.4 states that the City should "[e]xpand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards." The Housing Element carries forward the goals of the Framework Element Housing chapter to encourage infill development and increase density in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit.

The Housing Element encourages new construction of a range of different housing types that address the needs of the City's households. Chapter 1, Housing Needs Assessment, identifies the City's share of the housing needs established in the RHNA. In particular, Table 1.29, City of Los

[212] City of Los Angeles 2013-2021 Housing Element. Accessed November 20, 2018. https://planning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm Accessed November 20, 2018.

Angeles Regional Housing Needs Assessment Allocation, indicates that the City's needs assessment allocation includes 82,002 housing units of which 35,412 units, or 43.2 percent, would be for above moderate-income households.

The remaining 56.8 percent of the needed housing units consist of 13,728 moderate-income units (16.8 percent), 12,435 low-income units (15.2 percent), 10,213 very-low-income units (12.5 percent), and 10,213 extremely-low-income units (12.5 percent).[213]

The Project is a mixed-income project that would offer a mixture of studio, one-bedroom, two-bedroom, and three-bedroom units. The Project would provide 256 new residential units, of which 29 units would be reserved for Extremely Low Income households. Thus, the Project would support meeting the City's RHNA allocations by contributing to both the overall supply of housing as well as contributing to the availability of housing for Extremely Low Income households. The Project Site is close to multiple transit options that serve the greater Los Angeles region. Specifically, the Project Site is located less than 500 feet from the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line. The Project Site is also in close proximity to several bus lines including Metro Lines 18, 51, 52, 201, 204, and 351 and the Wilshire Center/Koreatown DASH line.

Therefore, the Project would be substantially consistent with the Los Angeles General Plan Housing Element and impacts would be less than significant.

City of Los Angeles Mobility Plan 2035

Mobility Plan 2035 (Mobility Plan),[214] which was adopted in January 2016, is a comprehensive update of the Transportation Element, which in part includes the City's classification system for roadways. The Mobility Plan provides revised street standards in an effort to provide a more enhanced balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design, and site access. Various modes of travel are encouraged by the Mobility Plan, including walking, biking and using public transit. Key objectives within the Mobility Plan are as follows:

> **Policy 2.3:** Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.
>
> **Policy 3.1:** Recognize all modes of travel, including pedestrian, bicycle, transit and vehicular modes including goods movement as integral components of the City's transportation system.
>
> **Policy 3.3:** Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.
>
> **Policy 3.4:** Provide all residents, workers and visitors with affordable, efficient, convenient and attractive transit services.

[213] Ibid, Table 1.29 (pg. 1-79).

[214] City of Los Angeles Mobility Plan 2035 An Element of the General Plan, https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf Accessed November 20, 2018.

Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.

Policy 4.13: Balance on-street and off-street parking supply with other transportation and land use objectives.

Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.

Policy 5.4: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.

The Project would support the Mobility Plan policies listed above as it promotes a balanced transportation system by locating a mixed-use, mixed-income project on its urban infill Project Site located in an area that has an existing mix of commercial, residential, office, and educational uses. The Project Site is also located within a TPA and is within walking distance of Wilshire/Vermont Metro Rail Station and numerous Metro bus lines. The Project encourages pedestrian and bicycle activity by locating new residents, employees and visitors in close proximity to public transit and services. Project residents, employees and visitors would have the option to walk, ride bicycles or use public transit to access jobs and services in the surrounding neighborhood and nearby centers such as Downtown Los Angeles.

The Project would provide bicycle parking for residential, office, and commercial uses, adhering to the Code requirements for bicycle parking. As such, the Project would provide convenient, secure and well-maintained bicycle parking facilities that would encourage the use of bicycles by Project residents and visitors and a reduction in the use of vehicular travel.

Because the Project would be consistent with these applicable policies of the Mobility Plan, impacts would be less than significant. Additional discussion of the Mobility Plan is provided in Item 5.17, *Transportation*.

Do Real Planning

The City Planning Commission's Do Real Planning document[215] includes fourteen guidelines intended to set the City on a course toward sustainability. Many of the guidelines address procedures for the operation of the Department of City Planning or issues addressing specific settings and types of projects that are different from the Project. However, of the fourteen guidelines, several address planning concepts that are relevant to the Project. Guidelines of particular note are those that pertain to location of land uses and density (Guidelines 3 and 6), walkability/site design/parking location (Guidelines 1, 2, 9, and 12), improvement of housing stock for every income (Guideline 5), and green design with abundant landscaping (Guidelines 7 and 8). Guideline 1, Demand a Walkable City, has led to the development of the Walkability Checklist, discussed below. Guidelines that would be applicable to the Project include the following:

- Guideline 2, *Offer Basic Design Standards*, Guideline 8, *Landscape in Abundance*, and Guideline 9, *Arrest Visual Blight*, apply to the appearance of the City. The

[215] City of Los Angeles Do Real Planning. http://planning.lacity.org/Reorganization/DoRealPlanning.pdf Accessed November 20, 2018.

Project would replace the existing school uses and surface parking lot surrounded by perimeter fencing with a new mixed-use development that would include residential, office, and commercial uses. The Project has been designed to respond to the context and character of the surrounding active, urban neighborhood, which is adjacent to residential, commercial, offices, schools and other services. The Project would provide substantial new landscaping, 64 new trees, a corner pedestrian plaza, and ground-floor commercial that would include and outdoor dining area, office uses, and amenities that would enhance the pedestrian experience.

- Guideline 3, *Require Density Around Transit*, and Guideline 6, *Locate Jobs Near Housing*, address the location of new development within the City. The Project would be supportive of these Guidelines as it would increase population density and provide new housing than currently exists on the Project Site, including housing for Extremely Low Income households in an area that is well-served by public transit. The Project would provide new employment opportunities and would also be located near existing employment centers.
- Guideline 5, *Advance Homes for Every Income*, addresses the value of accommodating higher densities and the need to address housing for the poor and middle class. The Project would increase the City's housing stock with a variety of unit sizes and unit costs, including housing affordable to Extremely Low Income households.
- Guideline 12, *Identify Smart Parking Requirements*, addresses smart parking guidelines intended to avoid parking lots that occupy prime street frontage. The Project would replace existing surface parking with a mixed-use development that would include subterranean parking for the commercial and office uses and residential units located within the tower. Five at-grade space units would be provided for the townhouse units directly behind the townhomes along Shatto Place and would not be directly visible from the street. Thus, the parking would be provided internal to the Project and would not occupy prime street frontage.

Because the Project would be consistent with these applicable Guidelines, the Project would be consistent with the Planning Commission's Do Real Planning Guidelines and impacts would be less than significant.

Conclusion:

The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be less than significant. No mitigation measures would be required.

Cumulative Impacts: Land Use and Planning

Related projects would be located primarily within the Wilshire Community Plan area and would have general access or proximity to transit. The intensification of development within this area would be consistent with the intent of the General Plan Framework, which is encourage a diversity of uses, including restaurants, commercial, residential uses, including affordable housing, in close proximity to transit. In addition, many related projects feature mixed-use components that provide housing, office, and street-oriented commercial uses that would enliven the street front and enhance pedestrian activity in accordance with the objectives of the General

Plan Framework and other adopted plans. Because it is anticipated that development of the related projects would be consistent with the objectives of the General Plan and other plans that support intensification and redevelopment, land use impacts would be less than significant. Any related projects requesting discretionary approvals, such as changes to General Plan or zoning would be vetted through environmental review and only allowed at discretion of the City and with consideration of consistency with applicable plans.

The related projects are located in urbanized areas that are nearly fully developed where, therefore, most opportunities to build involve infill development or recycling previously developed property. As both the Project and the related projects constitute in-fill development and would increase density, together they would not alter existing basic land use patterns.

The Project would be consistent with the policies and objectives of the Los Angeles Framework Element, Los Angeles General Plan Housing Element, Los Angeles General Plan Mobility Plan 2035, Los Angeles General Plan Noise Element, the City Planning Commission's Do Real Planning document, the SCAG's 2016 RTP/SCS, and the Wilshire Community Plan. Specifically, the Project is consistent with goals and policies to contained within these plans that aim to provide new housing, improve the pedestrian environment, support mixed use development near transit, improve air quality and active transportation (e.g., bicycling and walking), and encourage new high quality development that is compatible with existing uses and development.

Conclusion:

Cumulative land use and planning impacts would be less than significant and would not be cumulatively considerable. No mitigation measures would be required.

5.12 Mineral Resources

Would the project:

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

No Impact. The Project Site is located in an urbanized area of the City. There are no known mineral resources on the Project Site. The Project Site is not located in a designated surface mining district or mineral resource zone.[216]

Oil resource areas are designated as Oil Drilling Districts or State Designated Oil Fields, which often overlap. Generally, State Designated Oil Fields are broader than the drilling districts and follow specific streets and other geographic markers. Within the City of Los Angeles, oil drilling districts and oil fields are concentrated in an area reaching from downtown Los Angeles to west of the 405 Freeway, and in the north San Fernando Valley.

As shown in the Los Angeles General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, the Project Site is within the Los Angeles City Oil Drilling District and its respective State

[216] City of Los Angeles General Plan, Conservation Element, 2001.Appendix A. https://planning.lacity.org/cwd/gnlpln/consvelt.pdf Accessed November 29, 2018.

Designated Oil Field, which extends to the west of Vermont Avenue on its west edge and to the east to approximately Figueroa Street on its east edge.[217] As noted in the Phase I ESA, no oil or gas wells are located on the Project Site. The State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources online mapping website was reviewed for the location of active, plugged, or abandoned oil wells in the vicinity of the Project Site. There was no record of oil wells on the Project Site though oil wells are located within the Project Site vicinity to the west and the northeast. All of the off-site wells are currently buried, plugged, or idle and not in active use.[218] Therefore, as the Project Site does not have any wells and no active wells are located in its immediate vicinity, the Project would not result in the loss of availability of this known mineral resource. As stated earlier, the Project is not in a designated surface mining district or mineral resource zone.

Conclusion:

There would be no impact to mineral resources and no mitigation measures are required.

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

No Impact. The Project Site is located in an urbanized area of the City. There are no known mineral resources on the Project Site. In addition to oil and gas resources, mineral resources of local value in the City of Los Angeles include sand and gravel deposits and mining operations. Sand and gravel resources and mining operations are concentrated in the Sylmar community of the north San Fernando Valley.[219] Sand and gravel resources do not occur in the section of the Los Angeles basin occupied by the Project Site. Because the Project would not encroach on the City's existing sand and gravel mining operations or known sand and gravel resources, it would not result in the loss of availability of these locally-important mineral resources. Thus, the Project would not 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.

Conclusion:

There would be no impact to locally-important mineral resources and no mitigation measures are required.

Cumulative Impacts: Mineral Resources

Because of the large number and broad extent of City Oil Drilling Districts and State-designated oil fields in the Project study area, including the LA City Oil Drilling District and its respective State Designated Oil Field, some of the related projects would be located within these designated

[217] City of Los Angeles General Plan Safety Element, Exhibit E, Oil Fields and Oil Drilling Areas in the City of Los Angeles, May 1994. https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf Accessed September 10, 2018.

[218] California Department of Conservation, Division of Oil, Gas, and Geothermal Resources Well Finder. https://www.conservation.ca.gov/dog/Pages/WellFinder.aspx Accessed September 10, 2018.

[219] City of Los Angeles General Plan Conservation Element, Exhibit A, Mineral Resources, March 2001. https://planning.lacity.org/cwd/gnlpln/consvelt.pdf.

areas. However, with implementation new methodologies, such as slant drilling, related projects would not substantially reduce extraction capabilities, impede exploratory operations, or would cumulatively result in the significant loss of availability of oil resources.

Conclusion:

As discussed above, the Project would have a no impact on mineral resources, therefore, the Project would not contribute to any cumulative impacts and would not be cumulatively considerable. No mitigation measures are required.

5.13 Noise

Noise worksheets and technical data used in this analysis are provided in Appendix I.

Would the project result in:

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

Less Than Significant with Mitigation Incorporated. Noise is defined as unwanted sound; however, not all unwanted sound rises to the level of a potentially significant noise impact. To differentiate unwanted sound from potentially significant noise impacts, the City has established noise regulations that take into account noise-sensitive land uses. The following analysis evaluates the potential noise impacts at nearby noise-sensitive land uses resulting from construction and operation of the Project. As discussed below, implementation of mitigation measures would ensure a less-than-significant impact with respect to construction noise and operational noise impacts would be less than significant without the need for mitigation.

Noise Principles and Descriptors

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound, and addresses its propagation and control.[220] In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics addresses primarily the propagation and control of sound.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale (i.e., not linear) that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to

[220] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013. Available at: http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf, Accessed July 2018.

the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. Pressure waves traveling through air exert a force registered by the human ear as sound.[221]

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 hertz (Hz) and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to extremely low and extremely high frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). A-weighting follows an international standard methodology of frequency de-emphasis and is typically applied to community noise measurements.[222]

An individual's noise exposure is a measure of noise over a period of time, whereas a noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the contributing sound sources of the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources such as traffic. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual.[223] These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the measurement of noise exposure over a period of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. The time-varying characteristic of environmental noise over specified periods of time is described using statistical noise descriptors in terms of a single numerical value, expressed as dBA.[224] The most frequently used noise descriptors are summarized below:

L_{eq}: The L_{eq}, or equivalent sound level, is used to describe the noise level over a specified period of time, typically 1-hour, i.e., $L_{eq(1)}$, expressed as L_{eq}. The L_{eq} may also be referred to as the "average" sound level.

L_{max}: The maximum, instantaneous noise level.

L_{min}: The minimum, instantaneous noise level.

[221] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.

[222] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.

[223] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013.

[224] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.2, September 2013.

L_x: The noise level exceeded for specified percentage (x) over a specified time period; i.e., L_{50} and L_{90} represent the noise levels that are exceeded 50 90 percent of the time specified, respectively.

L_{dn}: The L_{dn} is the average noise level over a 24-hour day, including an addition of 10 dBA to the measured hourly noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account nighttime noise sensitivity. L_{dn} is also termed the day-night average noise level or DNL,

CNEL: Community Noise Equivalent Level (CNEL), is the average noise level over a 24-hour day that includes an addition of 5 dBA to the measured hourly noise levels between the evening hours of 7:00 p.m. to 10:00 p.m. and an addition of 10 dBA to the measured hourly noise levels between the nighttime hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity during the evening and nighttime hours, respectively.

City of Los Angeles Municipal Code

According to Section 111.01(a), ambient noise is the composite of noise from all sources near and far in a given environment, exclusive of occasion and transient intrusive noise sources and of the particular noise source or sources to be measure. Ambient noise shall be averaged over a period of at least 15 minutes at a location and time of day comparable to that during which the measurement is taken of the particular noise source being measured.

LAMC Section 41.40 prohibits any construction or repair work of any kind, or any excavating for, any building or structure, between the hours of 9:00 p.m. and 7:00 a.m. of the following day, and also prohibits construction activities before 8:00 a.m. or after 6:00 p.m. on any Saturday or national holiday or at any time on any Sunday.

Section 91.1207.11.2 prohibits interior noise levels attributable to exterior sources from exceeding 45 dBA CNEL in any habitable room.

Section 91.1207.11.4 states that noise-sensitive structures located where the exterior CNEL exceeds 60 dBA, are required to provide an acoustical analysis showing that the proposed residential design will limit exterior noise to achieve the prescribed allowable interior noise level.

Section 111.02 provides procedures and criteria for measuring the sound level of "offending" noise sources. To account for people's increased tolerance for short-duration noise events, Section 111.02 provides a 5 dBA allowance for a noise source occurring more than five but less than 15 minutes in any 1-hour period and an additional 5 dBA allowance (total of 10 dBA) for a noise source occurring 5 minutes or less in any 1-hour period between the hours of 7:00 a.m. and 10:00 p.m. of any day.

Section 112.02 prohibits operating any air conditioning, refrigeration or heating equipment for any residence or other structure or operating 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 or of a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than 5 dBA.

Section 112.05 defines maximum noise level limits for powered equipment or powered hand tools. Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet of a residential zone of the City, noise levels are limited to 75 dBA L_{max} at 50 feet 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. However, the noise level limitations do not apply where compliance is technically infeasible, which means that the noise level limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction devices or techniques during the operation of the equipment.

Section 114.03 prohibits loading/unloading activities within 200 feet of any residential building between the hours of 10:00 p.m. and 7:00 a.m. of the following day, including operation of dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise.

City of Los Angeles General Plan Noise Element (1999)

In addition to the previously described LAMC provisions, the City has also established noise guidelines in the Noise Element of the City's General Plan that are used for planning purposes. These guidelines are based, in part, on the community noise compatibility guidelines established by the California State Governor's Office of Planning and Research and are intended for use in assessing the compatibility of various land use types with a range of noise levels.[225] **Table 5-20**, *Guidelines for Noise Compatible Land Use*, provides the guidelines for land use compatibility for community noise sources. The CNEL noise levels for specific land uses are classified into four categories: (1) "normally acceptable" (2) "conditionally acceptable" (3) "normally unacceptable" and (4) "clearly unacceptable." A CNEL value of 70 dBA is considered the dividing line between a "conditionally acceptable" and "normally unacceptable" noise environment for noise sensitive land uses, including residences, transient lodgings, schools, and libraries.

[225] State of California, General Plan Guidelines, Governor's Office of Planning and Research, 2003.

TABLE 5-20
GUIDELINES FOR NOISE COMPATIBLE LAND USE

	Day-Night Average Exterior Sound Level (CNEL, dB)						
Land Use Categories	**50**	**55**	**60**	**65**	**70**	**75**	**80**
Residential: Single-Family, Duplex, Mobile Homes	A	C	C	C	N	U	U
Residential: Multifamily	A	A	C	C	N	U	U
Transient Lodging, Hotel, Motel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditorium, Concert Hall, Amphitheater	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/N	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

NOTES:
Based on the Governor's Office of Planning and Research, "General Plan Guidelines," 1990. To help guide determination of appropriate land use and mitigation measures vis-a-vis existing or anticipated ambient noise levels.
A: **Normally Acceptable:** Specified land use is satisfactory, based upon the assumption buildings involved are conventional construction, without any special noise insulation.
C: **Conditionally Acceptable:** New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will suffice.
N: **Normally Unacceptable:** New construction or development generally should be discouraged. A detailed analysis of the noise reduction requirements must be made and noise insulation features included in the design of a project.
U: **Clearly Unacceptable:** New construction or development should generally not be undertaken.

SOURCE: City of Los Angeles General Plan, Noise Element, 1999.

Thresholds of Significance

With respect to the community noise assessment, changes in noise levels of less than 3 dBA are generally not discernable to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase.[226]

Therefore, the significance threshold for mobile source noise is based on human perceptibility to changes in noise levels (increases) with consideration of existing ambient noise conditions and the City's land use noise compatibility guidelines. Therefore, the Project would result in a significant noise impact if:

- During Project construction, construction-related noise levels would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use;
- During Project operation, the Project's on-site sources (i.e., air conditioning units, parking structure, loading activity, refuse collection area, open space areas, parking

[226] California Department of Transportation, TeNS, Section 2.2.1., September 2013. Available at: http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf. Accessed July 2018.

structure, etc.) increase existing ambient noise levels at adjacent sensitive receptors by 5 dBA or more; or

- During Project construction or operation, Project-related off-site traffic would increase ambient noise levels by 5 dBA CNEL or more along roadway segments with adjacent sensitive receptors within areas categorized as either "normally acceptable" or "conditionally acceptable"; or causes ambient noise levels to increase by 3 dBA CNEL or more along roadway segments with adjacent sensitive receptors within areas categorized as either "normally unacceptable" or "clearly unacceptable."

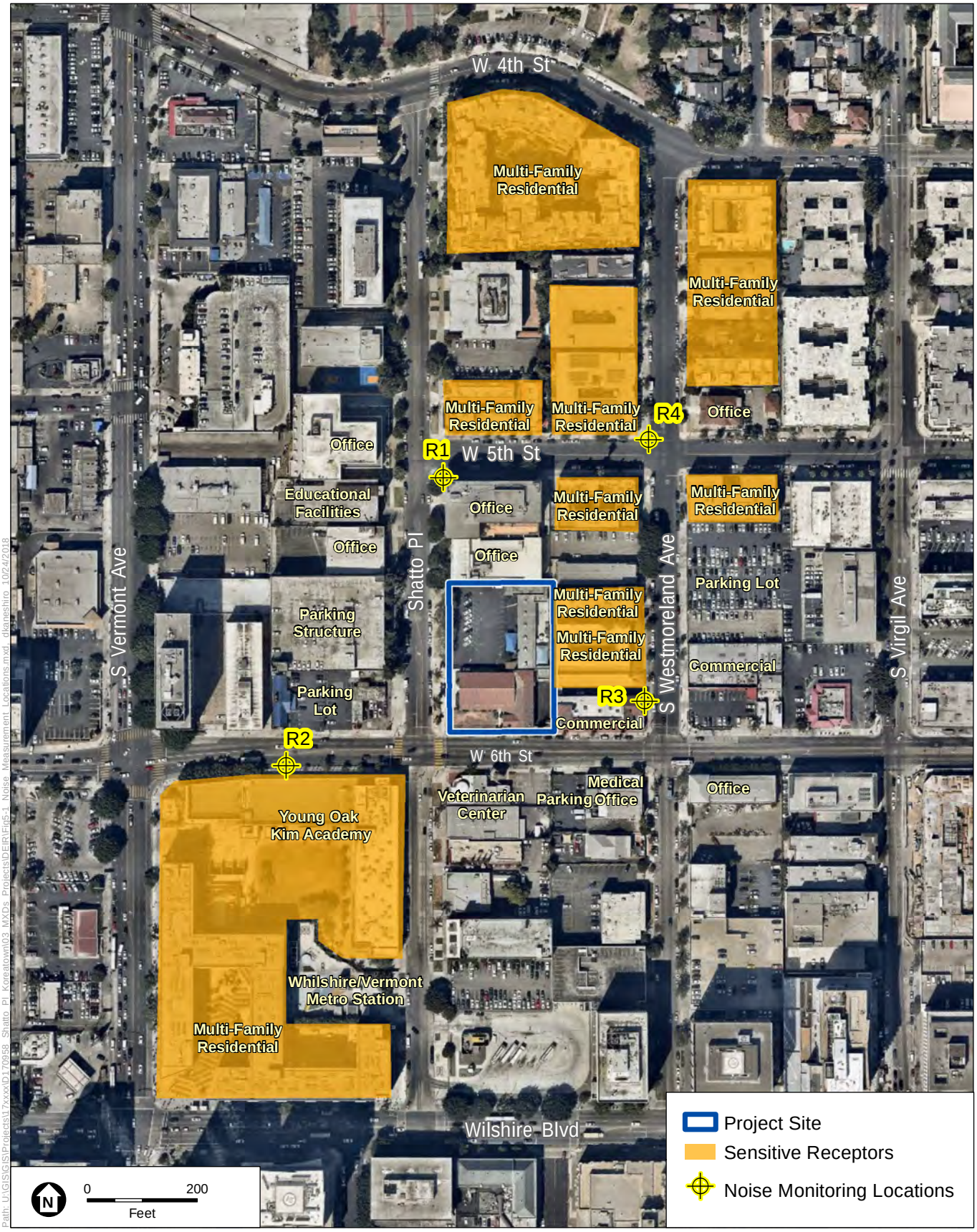
Existing Conditions

The Project Site is bounded by Shatto Place on the west, West 6th Street on the south, West 5th Street to the north, and South Westmoreland Avenue to the east. The Project Site is in a highly urbanized area surrounded by a mix of land uses, including commercial, office, residential uses and institutional and school facilities. **Figure 5-1**, *Noise Measurement Locations and Sensitive Receptor Locations*, shows the noise sensitive receptor locations in the vicinity of the Project Site.

To the west of the Project Site, along Shatto Place, land uses include office and creative office development, surface parking, a parking structure, and educational uses such as Nobel University. The Project Site is bordered to the north along West 5th Street by multifamily housing. To the east, along South Westmoreland Avenue, uses include multifamily residential, commercial and office development. To the south of the Project Site, along West 6th Street, land uses include various commercial and office uses and related surface parking. Southwest of the Project Site is Young Oak Kim Academy, a Los Angeles Unified School District (LAUSD) middle school:

- **North** – Land uses north of the Project Site along West 5th Street consist of noise sensitive uses such as multifamily residences.
- **East** – Land uses east of the Project Site along South Westmoreland Avenue consist of noise-sensitive uses such as multifamily residential uses and non-noise sensitive commercial uses.
- **South** – Land uses south of the Project Site along West 6th Street consist of non-noise sensitive commercial uses, and further to the southwest of the Project Site, noise sensitive uses such as Young Oak Kim Academy, a LAUSD middle school, and multifamily residential uses.
- **West** – Land uses west of the Project Site along Shatto Place include a noise-sensitive educational use (Nobel University) and non-noise sensitive commercial uses.

To quantify the existing noise environment of the Project Site, short-term (15-minute) noise measurements were conducted at locations R1 through R4. Ambient sound measurements were conducted on Tuesday, May 8, 2018, to characterize the existing noise environment in the Project Site vicinity, as shown on Figure 5-1.



SOURCE: ESRI 2017

550 Shatto Place

Figure 5-1
Noise Measurement Locations and Sensitive Receptor Locations

The ambient noise measurements were conducted in accordance with the City's standards.[227] The ambient noise measurements were conducted using a Larson-Davis Model LxT Sound Level Meter (SLM). The Larson-Davis LxT SLM is a Type 1 standard instrument, as defined in the American National Standard Institute (ANSI) S1.4. The SLMs were calibrated and operated according to manufacturer specifications. The SLM microphone was placed at a height of 5 feet above ground level.

These monitoring locations provide a representative characterization of the existing noise conditions within the vicinity of the Project Site. The results of the ambient noise measurement data are summarized in **Table 5-21**, *Summary of Ambient Noise Measurements*. As shown in Table 5-21, the measured L_{eq} ranged from 61 to 70 dBA.

TABLE 5-21
SUMMARY OF AMBIENT NOISE MEASUREMENTS

Site ID	Monitoring Date(s)	Start Time	End Time	L_{eq}	L_{max}	L_{min}	L_{10}	L_{50}	L_{90}
R1 SW Corner of 5th Street and Shatto Place (Nobel University and MFR)	5/8/2018	4:55 p.m.	5:10 p.m.	66	78	52	69	64	57
R2 North Side of 6th Street (School)	5/8/2018	4:37 p.m.	4:52 p.m.	70	86	58	73	68	62
R3 West Side Westmoreland Avenue (MFR)	5/8/2018	5:28 p.m.	5:43 p.m.	61	76	51	63	58	54
R4 NW 5th Street and Westmoreland Avenue (MFR)	5/8/2018	5:12 p.m.	5:27 p.m.	61	76	49	65	57	52

MFR = multifamily residences

SOURCE: ESA, 2018.

Project Design Features

The Project would include the following Project Design Features (PDFs) to minimize or avoid noise its effects. As described in Section 3, SCEA Criteria and Transit Priority Project Consistency Analysis, Table 3-3, *Project Consistency with the SCAG 2016-2040 RTP/SCS Mitigation Measures*, the Project PDFs include applicable and relevant noise mitigation measures contained in the 2016 RTP/SCS PEIR (such as SCAG 2016-2040 RTP/SCS Mitigation Measures MM-NOISE-1(b) and MM-NOISE-2(b)), to minimize potential impacts related to noise. The PDFs are incorporated into the Project and include specific baseline development features that will be implemented by the Project Applicant and agreed to by the City. The Project Applicant is committed to implementation of the PDFs and the City will take appropriate steps to enforce and verify compliance with these commitments.

> **PDF NOISE-1:** The Project shall limit construction and demolition to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays or holidays (City observed).

[227] Los Angeles Municipal Code, Section 111.01.

PDF NOISE-2: The Project will not require or allow the use of impact pile drivers.

PDF NOISE-3: The Project will not allow any delivery truck idling for more than 5 consecutive minutes in the loading area pursuant to State regulation (Title 13 California Code of Regulations, Section 2485). Signs will be posted in delivery loading areas specifying this idling restriction.

PDF NOISE-4: The Project will not require or allow operation of any amplified sound system in the outdoor areas except for downward or inward facing speakers playing background music that will be confined to the outside ground-level dining patio along West 6th Street and the amenity decks on levels 2, 30, and 31.

Construction Noise

Construction of the Protect is anticipated to begin in the second quarter of 2019 with an estimated duration of approximately 26 months, and the Project is expected to be occupied by 2021. Grading activities would include cut and fill with approximately 56,000 cubic yards being exported from the Project Site. Construction hours would occur in accordance with the LAMC requirements, which prohibit construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday. Parking for the construction workers would be provided on the Project Site or would be leased from near-by off-site parking areas.

The analysis includes consideration of construction noise effects on noise sensitive receivers in the vicinity of the Project Site due to the operation of construction equipment (on-site construction activities), materials delivery trucks, worker vehicle trips, and haul trucks (off-site construction activities).

On-Site Construction Activities

Noise from construction activities would be generated by the operation of vehicles and equipment involved during various stages of construction: demolition, excavation, foundation construction, building construction and building renovations. The noise levels generated by construction equipment would vary depending on factors such as the type and number of equipment, the specific model (horsepower rating), the construction activities being performed, and the maintenance condition of the equipment. Construction noise levels associated with the Project were analyzed assuming a mix of construction equipment, estimated durations, and construction phasing. The mix of construction equipment, estimated durations of construction phases were estimated based on construction information provided by the Applicant and construction equipment data in the California Emissions Estimator Model (CalEEMod) and supplemented with equipment that would be used based on the Project-specific design with input from the Project Applicant and Brandow & Johnston Structural & Civil Engineers. Construction equipment assumptions are provided in Appendix I of this SCEA. It was also assumed that the Project contractor(s) would equip the construction equipment, stationary or mobile, with properly operating and maintained noise mufflers, consistent with the manufacturers' standard operation procedures. The Project would also be required to comply with LAMC 41.40 and Section 112.05, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Consistent with LAMC Section 112.05, the construction noise levels were estimated at a distance to sensitive receptor locations, conservatively assuming that multiple pieces of equipment would be operating simultaneously and some equipment would be located along the property lines while the others would be dispersed through the Project Site. These assumptions represent a conservative noise scenario as all construction equipment used in a given phase would not typically operate concurrently and at full power. Therefore, the estimated noise levels represent a conservative maximum, and actual noise levels could be lower. **Table 5-22**, *Estimated Unmitigated Construction Noise Levels*, shows the estimated construction noise levels expected to occur at the nearest off-site sensitive uses during a peak day of construction activity at the Project Site.

The maximum unmitigated construction noise levels would be generated when the specified construction activity would be occurring at the location closest to the off-site noise-sensitive receptor property lines. As shown in Table 5-22, unmitigated construction noise levels were estimated to reach a maximum of approximately 85 dBA at noise-sensitive receptor location R3. These maximum unmitigated construction noise levels would be generated when demolition, site preparation, foundation/concrete pour, paving activities would be ongoing very close or adjacent to the Project Site's eastern boundaries. The unmitigated construction noise levels would exceed the 66 dBA L_{eq} significance threshold at location R3 (daytime noise levels shown in Table 5-21, plus 5 dBA). As site demolition activities, as well as other construction activities, are completed near the Project Site boundary, and construction activities move toward the interior of the Project Site farther from the Project Site boundary, the construction noise levels at these noise-sensitive residential property lines would decrease accordingly. As shown in Table 5-22, the maximum unmitigated construction noise levels generated by Project construction would not exceed the threshold levels at any of the other noise-sensitive receptor locations. Therefore, Project construction noise would be considered a potentially significant impact. Therefore, Project specific Mitigation Measures MM NOISE-1 and MM NOISE-2 are identified below to reduce the Project's potential impacts to a less-than-significant level.

TABLE 5-22
ESTIMATED UNMITIGATED CONSTRUCTION NOISE LEVELS

Representative Ambient Measurement Location	Construction Phases	Distance from Construction Activity to Property Line of Sensitive Receptor (ft.)	Reference Construction Noise Level at Property Line of Off-Site Sensitive Location (dBA L_{eq})	Significance Threshold[a]	Exceed Significance Threshold Before Mitigation?
R1 (Nobel University and multifamily residential north of the Project Site)[b]	Demolition	90	61	71	No
	Site Preparation	90	57		No
	Utilities/Trenching	90	53		No
	Foundation/Concrete Pour	90	58		No
	Building Construction	90	56		No
	Architectural Coating	90	54		No
	Paving	90	59		No
	Renovation	430	44		No
R2 (school southwest of the Project Site)[c]	Demolition	230	64	75	No
	Site Preparation	230	62		No
	Utilities/Trenching	230	56		No
	Foundation/Concrete Pour	300	60		No
	Building Construction	300	58		No
	Architectural Coating	300	53		No
	Paving	300	61		No
	Renovation	140	61		No
R3 (multifamily residential east of the Project Site)	Demolition	25	85	66	Yes
	Site Preparation	25	79		Yes
	Utilities/Trenching	25	78		Yes
	Foundation/Concrete Pour	35	80		Yes
	Building Construction	35	77		Yes
	Architectural Coating	35	77		Yes
	Paving	25	81		Yes
	Renovation	30	75		Yes
R4 (multifamily residential northeast of the Project Site)[b]	Demolition	80	61	66	No
	Site Preparation	80	57		No
	Utilities/Trenching	80	54		No
	Foundation/Concrete Pour	90	56		No
	Building Construction	110	52		No
	Architectural Coating	110	52		No
	Paving	110	57		No
	Renovation	435	39		No

[a] The significance criteria, per the City's Threshold Guide, is the average daytime ambient noise level as shown in Table 5-21 plus 5 dBA.
[b] Sensitive receptors are fully shielded from the Project Site by existing buildings.
[c] Sensitive receptors are partially shielded from the Project Site by existing buildings.
[d] Detailed calculations are provided in Appendix I of this SCEA MND.

SOURCE: ESA, 2018.

Mitigation Measures

MM NOISE-1: The Project shall implement construction noise reduction strategies to reduce noise levels from construction affecting the noise-sensitive residential receptors located to the east of the Project Site, with a performance standard of achieving a construction noise level of less than 66 dBA L_{eq} at the noise-sensitive residential receptors adjacent to the east of the Project Site. The noise reduction strategies shall include one or a combination of the following to achieve the performance standard.

- Use construction equipment, fixed or mobile, that individually generates less noise than presumed in the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). Examples of such equipment are medium, compact, small, or mini model versions of backhoes, cranes, excavators, loaders, or tractors; or newer model equipment; or other applicable equipment that are equipped with reduced noise-generating engines. Construction equipment noise levels shall be documented based on manufacturer's specifications. The construction contractor shall keep construction equipment noise level documentation on-site for the duration of Project construction.
- Noise-generating equipment operated at the Project Site shall be equipped with California industry standard noise control devices to effectively reduce noise levels, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. The reduction in noise level from noise shielding and muffling devices shall be documented based on manufacturer's specifications. The construction contractor shall keep noise shielding and muffling device documentation on-site and documentation demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications on-site for the duration of Project construction.
- Construction and demolition activities shall be scheduled so as to minimize or avoid operating multiple heavy pieces of equipment such as a large dozer, concrete saw, and excavator, simultaneously at the perimeter of the Project Site along the eastern boundary of the Project Site.
- The Project shall provide temporary minimum 8-foot-tall construction noise barriers along property lines facing adjacent off-site residential buildings to the east and northeast. The temporary barriers shall at a minimum remain in place during early Project construction phases (up to the start of framing) when the use of heavy equipment is prevalent. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel. The Applicant shall ensure through appropriate postings and frequent visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period The construction management company's name and telephone number(s) shall be posted at a least one location along each street frontage that borders the Project Site.

- The Project shall stage noise-generating construction equipment as far away from the noise-sensitive receptors adjacent to the east of the Project Site as practicable; minimize the number of noise-generating construction equipment in simultaneous use; and/or provide other noise-reducing techniques.

The effectiveness of the noise reduction strategies to achieve the performance standard shall be documented by on-site noise monitoring conducted by a qualified acoustical analyst using a Type 1 instrument in accordance with the American National Standards Institute (ANSI) S1.4. Noise monitoring shall be conducted during early Project construction phases when the use of heavy equipment is prevalent.

MM NOISE-2: The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the Project Site. Signs shall also be posted at the Project Site that include permitted construction days and hours.

Mitigation measure MM NOISE-1 would require the implementation of noise reduction devices and techniques during construction at the Project Site that would reduce noise levels generated by the construction of the Project to the maximum extent that is technically feasible to achieve the performance standard. As previously discussed, the construction noise level limitations of Section 112.05 do not apply where compliance is technically infeasible, i.e., when noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction devices or techniques during the operation of the equipment.

Implementation of mitigation measure MM NOISE-1 would reduce the Project's construction noise levels of 85 dBA to below 66 dBA at the sensitive receptor location R3. Therefore, noise-sensitive receivers located at the nearest multifamily residence east of the Project Site would experience noise levels below the significance threshold of 66 dBA at the nearest multifamily residence (R3). Noise-sensitive receptors located to the west, south, and north of the Project Site, represented by noise measurement locations R1, R2, and R4, would receive further attenuation from existing commercial buildings situated between their locations and the Project Site, and therefore would experience noise levels below the significance thresholds of 71 dBA at R1, 75 dBA at R2, and 66 dBA at R4 without mitigation.

Implementation of mitigation measure MM NOISE-2 would provide the community with a contact phone number for the Project's designated construction relations officer to address community concerns. The Project would comply with LAMC Sections 41.40; the Project's construction activities, including delivery and haul routes, would be restricted to hours between 7:00 a.m. and 7:00 p.m. Monday through Friday and 8:00 a.m. and 6:00 p.m. on Saturdays and City-observed holidays (PDF NOISE-1), and no noise-generating construction activities would take place on Sundays, per LAMC requirements.

Off-Site Construction Activities

Peak haul truck activity would occur during the excavation/grading phase of construction, when up to 76 daily truck trips (38 inbound, 38 outbound) are forecast to occur, or approximately 12

trips per hour (six inbound, six outbound).[228] In addition, up to 16 worker daily vehicle trips (8 inbound, 8 outbound) would occur during this phase.[229] The Project proposes the following haul truck route:[230]

> **Loaded Truck Route:** The trucks would exit the Project Site travel north on Shatto Place; travel west on 4th Street; north on Vermont Avenue; travel on the US 101 South; exit Alvarado Street; travel north on Alvarado/Glendale Boulevard, travel north on the SR 2; travel on the SR 134 east to Figueroa Street; and travel north on Figueroa Street to the disposal site.
>
> **Empty Truck Route:** Exit disposal site, south on Figueroa Street, travel on the SR 134 west, 2 Freeway south, to Glendale Blvd./Alvarado, 101 Freeway North, exit Vermont Avenue; travel south on Vermont east on 4th Street; and travel south on Shatto Place to the Project Site.

The Project's haul truck trips and worker vehicle trips would generate noise levels of approximately 63.5 dBA CNEL along Shatto Place between 4th Street and 6th Street, 64.8 dBA CNEL along 4th Street between Vermont Avenue and Shatto Place, and 68.7 dBA CNEL along Vermont Avenue between 3rd Street and 4th Street. Off-site construction related traffic noise calculation worksheets are provided in Appendix I of this SCEA. As shown in **Table 5-23**, *Off-Site Traffic Noise Impacts – Existing*, the existing noise levels are 62.4 dBA CNEL along Shatto Place between 4th Street and 6th Street, 63.9 dBA CNEL along 4th Street between Vermont Avenue and Shatto Place, and 68.4 dBA CNEL along Vermont Avenue between 3rd Street and 4th Street.

Since construction traffic noise levels generated by the Project's truck trips and worker vehicle trips would increase ambient noise levels by approximately 1.1 dBA on Shatto Place, 0.9 dBA on 4th Street and 0.3 dBA on Vermont Avenue, the noise level increases generated by the Project's haul truck trips and workers vehicle trips would be below the significance threshold of 3 dBA, and therefore, impacts would be less than significant. The maximum number of construction traffic trips were estimated during excavation/grading phase. The maximum haul truck trips and worker vehicle trips would represent the highest noise levels from off-site construction related traffic during excavation/grading phase. Therefore, the noise levels increases by material trucks and worker trips during utilities/trenching, foundation, and building construction phases would be lower than the noise levels increased by haul truck trips and worker vehicle trips during excavation/grading phase.

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[228] Construction equipment data in the California Emissions Estimator Model (CalEEMod) and supplemented with equipment that would be used based on the Project-specific design with input from Brandow & Johnston Structural & Civil Engineers.

[229] Construction equipment data in the California Emissions Estimator Model (CalEEMod) and supplemented with equipment that would be used based on the Project-specific design with input from Brandow & Johnston Structural & Civil Engineers.

[230] Application for Review of Import-Export Routes, Shatto Place Project, City of Los Angeles, Department of Building and Safety Grading Division, August 3, 2018.

TABLE 5-23
OFF-SITE TRAFFIC NOISE IMPACTS – EXISTING

Roadway	Roadway Segment	Calculated Traffic Noise Levels, dBA CNEL		Project Increment[a] (B–A)	Exceeds Significant Threshold?
		Existing (A)	Existing Plus Project (B)		
6th St	between Normandie Ave and Vermont Ave	68.3	68.3	0.0	No
	between Vermont Ave and Shatto Place	67.3	67.3	0.0	No
	between Shatto Place and Virgil Ave	67.9	67.9	0.0	No
	between Virgil Ave and Rampart Blvd	67.6	67.7	0.1	No
	between Rampart Blvd and Alvarado St	66.1	66.2	0.1	No
Shatto Pl	between 4th St and 6th St	62.4	62.2	-0.2	No
	between 6th St and Wilshire Blvd	62.1	62.2	0.1	No
4th St	between Vermont Ave and Shatto Pl	63.9	64.0	0.1	No
	between Shatto Pl and Virgil Ave	63.5	63.6	0.1	No
Wilshire Blvd	between Vermont Ave and Shatto Pl	68.2	68.2	0.0	No
	between Shatto Pl and Hoover St	68.7	68.7	0.0	No
3rd St	between Vermont Ave and Virgil Ave	68.1	68.1	0.0	No
Vermont Ave	between 3rd St and 4th St	68.4	68.4	0.0	No
	between 4th St and 6th St	67.9	67.9	0.0	No
	between 6th St and Wilshire Blvd	67.1	67.1	0.0	No
	between Wilshire Blvd and 8th St	67.9	67.9	0.0	No
Virgil Ave	between 3rd St and 4th St	65.7	65.7	0.0	No
	between 4th St and 6th St	65.3	65.3	0.0	No

NOTES:
Noise calculations are provided in Appendix I of this SCEA.
[a] Increase due to Project-related traffic only at Project build-out.
[b] Off-site traffic noise levels were calculated based on traffic volume provided by the Gibson Transportation Consulting 2018 Transportation Impact Study.

SOURCE: Gibson Transportation Consulting, Inc., *Transportation Impact Study for the 550 S. Shatto Place Project*, September 2018.

Mitigation Measures:

MM NOISE-3: Due to potential noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on these streets during school hours.

While the Project would not result in significant noise impacts at the school receptor, implementation of MM Noise-3, any remaining noise impacts would be reduced to less than significant.

Therefore, compliance with regulatory compliance measures, Project Design Features NOISE- 1 to NOISE- 4 and the implementation of MM NOISE- -1 to MM NOISE- -3, any noise impacts during construction would be reduced to a less than significant level.

Operational Noise

The existing noise environment in the Project Site vicinity is dominated by traffic noise from nearby roadways and commercial and residential activities, as well as by noise generated by the Project Site's existing school uses and former church building. As shown below, long-term operation of the Project would have a minimal effect on the noise environment in proximity to the Project Site.

Off-Site Operational Traffic Noise

Vehicle trips attributed to operation of the Project would increase average daily traffic (ADT) volumes along the major thoroughfares within the Project Site vicinity, which were analyzed to determine if any traffic-related noise impacts would result from Project development. The street segments chosen by LADOT for this analysis have residential land uses which were expected to be the most affected by traffic increases generated by the Project.

Roadway noise impacts were evaluated using a spreadsheet model developed based on the methodologies provided in FHWA's TNM Technical Manual (FHWA 1998). Project specific traffic volume data is provided in the *Transportation Impact Study for the 550 South Shatto Place Project, October 2018* (Transportation Study), prepared by Gibson Transportation Consulting, Inc. included in Appendix J of this SCEA. Roadway noise attributable to Project development was calculated and compared to existing and future noise levels that would occur under the "Without Project" condition.

Table 5-23 presents the change in mobile source noise resulting from Project implementation as compared to existing conditions. As shown, the off-site roadway traffic volumes associated with Project operation would result in a maximum increase in CNEL of 0.1 dBA along the 6th Street segments, between Virgil Avenue and Rampart Boulevard and between Rampart Boulevard and Alvarado Street, and along the 4th Street segments between Vermont Avenue and Shatto Place and between Shatto Place and Virgil Avenue. Noise calculations are provided in Appendix I of this SCEA.

Table 5-24, *Off-Site Traffic Noise Impacts – Future (2021)*, presents the change in mobile source noise resulting from Project implementation under future conditions (2021). As shown in Table 5-24, the off-site roadway traffic volumes associated with the Project under future with Project conditions would result in a maximum increase in CNEL of 0.1 dBA along the segments of Shatto Place, between 6th Street and Wilshire Boulevard, 4th Street between Vermont Avenue and Shatto Place, Wilshire Boulevard between Shatto Place and Hoover Street, Vermont Avenue between 3rd Street and 4th Street and between 6th Street and Wilshire Boulevard. All other segments would experience noise level increases in CNEL lower than 0.1 dBA. The noise level increase on local roadways due to the Project's off-site traffic would not exceed the 3 dBA threshold, and impacts would be less than significant, and no mitigation measures are required.

On-Site Operational Noise

The Project would generate noise associated with operation of its on-site uses, including noise generated by its building mechanical equipment, parking structure activities, open space activities and delivery and trash hauling trucks.

TABLE 5-24
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2021)

		Calculated Traffic Noise Levels, dBA CNEL					
Roadway	**Roadway Segment**	**Existing (A)**	**Future[a] (B)**	**Future Plus Project[b] (C)**	**Project Increment[c] (C-B)**	**Cumulative Increment[c] (C-A)**	**Exceeds Significant Threshold?**
6th St	between Normandie Ave and Vermont Ave	68.3	69.1	69.1	0.0	0.8	No
	between Vermont Ave and Shatto Place	67.3	68.1	68.1	0.0	0.8	No
	between Shatto Place and Virgil Ave	67.9	68.9	68.9	0.0	1.0	No
	between Virgil Ave and Rampart Blvd	67.6	68.6	68.6	0.0	1.0	No
	between Rampart Blvd and Alvarado St	66.1	67.2	67.2	0.0	1.1	No
Shatto Pl	between 4th St and 6th St	62.4	62.5	62.3	-0.2	-0.1	No
	between 6th St and Wilshire Blvd	62.1	62.1	62.2	0.1	0.1	No
4th St	between Vermont Ave and Shatto Pl	63.9	64.6	64.7	0.1	0.8	No
	between Shatto Pl and Virgil Ave	63.5	64.2	64.2	0.0	0.7	No
Wilshire Blvd	between Vermont Ave and Shatto Pl	68.2	69.3	69.3	0.0	1.1	No
	between Shatto Pl and Hoover St	68.7	69.7	69.8	0.1	1.1	No
3rd St	between Vermont Ave and Virgil Ave	68.1	68.5	68.5	0.0	0.4	No
Vermont Ave	between 3rd St and 4th St	68.4	69.8	69.9	0.1	1.5	No
	between 4th St and 6th St	67.9	69.3	69.3	0.0	1.4	No
	between 6th St and Wilshire Blvd	67.1	68.5	68.6	0.1	1.5	No
	between Wilshire Blvd and 8th St	67.9	69.0	69.0	0.0	1.1	No
Virgil Ave	between 3rd St and 4th St	65.7	66.5	66.5	0.0	0.8	No
	between 4th St and 6th St	65.3	66.1	66.1	0.0	0.8	No

NOTES:
Noise calculations are provided in Appendix I of this SCEA
[a] Includes future growth plus related (cumulative) projects identified in the Transportation Impact Study (Appendix J).
[b] Includes future growth plus related (cumulative) projects and Project traffic.
[c] Increase due to future growth, related (cumulative) projects, and Project traffic.

SOURCE: Gibson Transportation Consulting, Inc., Transportation Impact Study for the 550 S. Shatto Place Project, September 2018.

Mechanical Equipment Noise

The operation of building mechanical equipment typical for developments like the Project, such as air conditioners, fans, generators, and related equipment, generate varying noise levels. The Project's mechanical equipment would be located on the mechanical level near the top floor of the new tower, and would be shielded from nearby land uses by sound screen/parapet walls to attenuate the noise generated and avoid conflicts with adjacent uses. The Project would remodel and repurpose the former church building into restaurant uses. Therefore, mechanical equipment

for the former church building would be replaced with new mechanical equipment. The new mechanical equipment would have lower noise levels than the old mechanical equipment for the former church building. In addition, all mechanical equipment would be designed with appropriate noise control devices, such as sound attenuators, or acoustics louvers to comply with noise limitation requirements contained in LAMC Section 112.02, which limits the noise from such equipment causing an increase in the ambient noise level by more than five decibels. Therefore, operation of mechanical equipment would comply with the City's mechanical equipment noise limitations and impacts would be less than significant.

Emergency Generator Noise

The Project would include one on-site emergency generators located at east side of the proposed mixed-use building rated at approximately 1,200 kilowatts (approximately 1,610 hp). The emergency generators may be used in the event of a power outage to provide electricity for emergency safety lighting and other emergency electricity needs. Maintenance and testing of the emergency generator would not occur daily, but rather periodically, up to 50 hours per year per SCAQMD 1470. The emergency generator room would be located west of the loading area and screened from public view and shielded from surrounding off-site development. The nearest sensitive receptors include multifamily residential uses adjacent to the loading areas of the Project Site (R3) and are located within approximately 50 feet.

Based on a noise survey that was conducted for an equivalent generator by ESA, the generator would generate noise levels of approximately 96 dBA (L_{eq}) at 25 feet.[231] Based on a noise level source strength of 96 dBA at a reference distance of 25 feet, and accounting for distance attenuation (minimum 6 dBA loss) and barrier-insertion loss by the Project buildings (minimum 20 dBA insertion loss), generator-related activity noise would be approximately 70 dBA and would potentially increase the daytime average ambient noise level of 61 dBA L_{eq} at the multifamily residential uses represented by measurement location R3 by 5 dBA or more. As such, impacts from emergency generators would be potentially significant. Therefore, Mitigation Measures NOISE-4 is provided below to reduce the Project's potential impacts to a less significant level.

Mitigation Measures

> **MM NOISE-4:** The Project shall install a sound enclosure or equivalent noise attenuation measures for the Project's operational emergency generators that shall provide a minimum noise reduction of 15 dBA. The generator would generate noise levels of approximately 81 dBA (L_{eq}) at 25 feet with the noise attenuation measures. At Plan Check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

With installation of a sound enclosure as described in mitigation measure MM NOISE-4, the generator noise level would be reduced from 96 dBA at 25 feet distance to 81 dBA at 25 feet

[231] The generator noise measurements were conducted at a Verizon facility using the Larson-Davis 820 Precision Integrated Sound Level Meter (SLM) in November 2000. The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately 5 feet above the local grade. Generator noise data provided in Appendix I.

distance. Based on a noise level source strength of 81 dBA at a reference distance of 25 feet, and accounting for distance attenuation (minimum 6 dBA loss) and barrier-insertion loss by the Project buildings (minimum 20 dBA insertion loss), generator-related activity noise would be approximately 55 dBA and would not increase the daytime average ambient noise level of 61 dBA L_{eq} at the noise-sensitive uses represented by measurement location R3 by 5 dBA. As such, impacts would be mitigated to less than significant.

Parking Noise

The Project would provide 329 vehicle parking spaces on-site within four levels of subterranean parking and one at-grade level. Vehicles would enter the parking structure through the driveway located along Shatto Place, then drive east along the driveway to the back of the property, then turn north to enter the ramp into the parking structure. Sources of noise associated with parking facilities typically include engines accelerating, doors slamming, car alarms, and people talking. These noise levels would fluctuate throughout the day depending on the amount of vehicle and human activity. Noise levels would generally be the highest in the early morning and evening hours when the largest number of people would enter and exit the parking facility. The noise-sensitive uses closest to the parking entrance would be the multifamily residences, represented by noise measurement location/sensitive receptor location R4, located approximately 75 feet to the north. The nearest noise-sensitive uses to the east side of the ground-level (L1) parking would be multifamily residences located approximately 55 feet to the east. Nobel University and multifamily residences, R1, and Young Oak Kim Academy, R2, are located approximately 320 feet and 400 feet from the entrance of the parking structure.

For the purpose of providing a quantitative estimate of the noise levels that would be generated from the Project's parking area, the methodology recommended by Federal Transit Administration (FTA) for the general assessment of stationary transit noise sources was used. Using the methodology, the Project's peak hourly noise level that would be generated by the on-site parking levels was estimated using the following FTA equation for a parking lot:

$L_{eq}(h) = SEL_{ref} + 10\log (NA/1000) - 35.6$, where

$L_{eq}(h)$ = hourly L_{eq} noise level at 50 feet

SEL_{ref} = reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet

N_A = number of automobiles per hour

Based on the Project's transportation impact study, the Project is estimated to generate a total of 1,136 new daily vehicle trips, with an anticipated 23 new trips and 109 new trips during the a.m. and p.m. peak hours, respectively.[232] Using the FTA's reference noise level of 92 dBA SEL[233] at 50 feet from the noise source for a parking lot, it was determined that the Project's highest peak hour vehicle trips, which would be 109 trips during the p.m. peak hour, would generate noise

[232] Gibson Transportation Consulting, Inc., Transportation Impact Study for the 550 S. Shatto Place Project, September 2018. (Appendix J)

[233] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006. Available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf. Accessed November 2018.

levels of approximately 47 dBA L_{eq} at 50 feet from the Project's parking entrance. Accounting for distance attenuation of 6 dBA per doubling of distance, noise levels would be approximately 44 dBA L_{eq} at 75 feet north of the parking lot and approximately 47 dBA L_{eq} at 55 feet east of the Project's ground-level (L1) parking. These noise levels would not exceed the ambient noise levels of 61 dBA along Shatto Street (R4) and Westmoreland Avenue (R3). Noise levels experienced at locations R1 and R2 from the driveway access to the parking structure along Shatto Place and the entrance to the parking structure located at the northeast portion of the Project Site would be attenuated by existing commercial buildings. These noise levels would not exceed the ambient noise levels of 66 dBA at Nobel University and multifamily residences (R1) and 70 dBA at Young Oak Kim Academy (R2). Thus, this impact would be less than significant.

Loading and Refuse Service Areas Noise

Loading and unloading activities would occur at the eastern portion of the Project Site. Vehicle access to the loading areas would be from the entrance along Shatto place, located between the two buildings, approximately midway down the property line. Loading for move-ins would occur from the loading areas to the east of the Project Site and trash receptacles would be rolled out from interior trash areas to the loading areas. Loading area activities, including truck movements, idling, and loading/unloading operations, would generate noise levels that have the potential to adversely impact adjacent land uses during Project operations.

Based on measured noise levels, a delivery truck idling (at loading area) would generate noise levels of approximately 75 dBA (L_{eq}) at a 5-foot distance.[234] The nearest sensitive receptors include multifamily residential uses adjacent to the loading areas of the Project Site (R3) and are located within approximately 30 feet. The Young Oak Kim Academy (R2) along West 6th Street and adult school and multifamily residential uses (R1 and R4) along West 5th Street, are located approximately 350 feet from the potential loading activities. Based on a noise level source strength of 75 dBA at a reference distance of 5 feet, and accounting for distance loss from 5 feet to 60 feet for noise propagation (minimum 22 dBA insertion loss[235]), loading dock noise would be 53 dBA at the residential and school property lines and would not exceed the significance threshold of 75 dBA at the Young Oak Kim Academy (R2), 71 dBA at Nobel University and the multifamily residential uses (R1), and 66 dBA at the multifamily residential uses (R3 and R4). Thus, impacts to noise-sensitive uses would be less than significant.

Open Space Noise

Residential units would be located on levels three through 29 in the new mixed-use tower, while four townhouse units would be located on level two above the office uses. Level two would also include a landscaped amenity deck and a gym/fitness center. Level 30 would include a community room and open space and level 31 would include a pool, spa, and landscaped amenity

[234] The loading dock facility noise measurements were conducted at a loading dock facility at a Wal-Mart store using the Larson-Davis 820 Precision Integrated Sound Level Meter ("SLM") in May 2003. The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately 5 feet above the local grade. Noise measurement data are provided in Appendix I.

[235] Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (i.e., reduce) at a rate between 6 dBA for acoustically "hard" sites for each doubling of distance from the reference measurement, Caltrans, Technical Noise Supplement, September, 2013.

deck. Above level 31, is one level containing mechanical equipment. The Project would include the use of small background/ambient music speakers in the ground-floor restaurant outdoor patio area, and the amenity decks on level 2, 30, and 31. It is anticipated that the small background speakers would be ceiling mounted speakers, or small wall mounted speakers that play background music.

The noise from the proposed commercial uses use in the existing repurposed church building associated with the patio seating fronting 6th Street would be confined to the active street corner of West 6th St and Shatto Place. The nearest school use, R2, is located approximately 150 feet from the patio. Under a conservative scenario, there could be up to approximately 80 visitors in the patio at one time.[236] Noise from human conversation is approximately 55 dBA at a reference distance of 3 feet.[237] Assuming 40 visitors talking simultaneously, the continuous noise level would be up to 71 dBA at 3 feet. Based on a noise level source strength of 71 dBA at a reference distance of 3 feet, and accounting for distance attenuation of 6 dBA per doubling of distance, the outdoor area noise would be approximately 37 dBA at the closest noise-sensitive receptor, the school use at R2. The sound level of background music is typically higher than the background noise level by 3 dB or more; for the purposes of this analysis, background music is assumed to be 5 dB higher than the background noise level.[238] Since the patio seating would front on 6th Street, the sound level from the background music speakers is assumed to be approximately 75 dBA at 5 feet from the ground-floor restaurant outdoor patio area (5 dBA plus the noise levels of 70 dBA [R2, the north side of 6th Street], as shown in Table 5-21). Based on a noise level source strength of 75 dBA at a reference distance of 5 feet, and accounting for distance attenuation of 6 dBA per doubling of distance, sound levels from the background speakers would be approximately 41 dBA at the closest noise-sensitive receptor, the school use at R2. The combined noise levels of 37 dBA and 41 dBA would be approximately 42 dBA at the closest noise-sensitive receptor, the school use at R2, which would not exceed the significance threshold of 75 dBA (5 dBA plus the noise levels of 70 dBA [R2] as shown in Table 5-21).

The ground level public plaza located at the corner of Shatto Place and 6th Street, adjacent to the restaurant patio space would also allow for seating. However, this is a low-activity space for passive recreation that would not generate substantial additional noise from the Project Site.

Within the new mixed-use building, level two contains an amenity deck that includes a children's play area, seating, and exercise area for tenants. As the amenity deck would be enclosed by the Project building, it would be shielded from off-site noise-sensitive receptors to the west and east. Under a conservative scenario, there could be up to 30 people on the amenity deck at one time.[239] Noise from human conversation is approximately 55 dBA at a distance of 3 feet and noise from children talking loudly is approximately 74 dBA at a distance of 3 feet.[240] Assuming 15 adults and 15 children, with half of the people talking loudly simultaneously, the continuous noise level

[236] Occupant loads for open spaces are provided by the Project Applicant.

[237] American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012).

[238] https://www.toa.jp/soundoh_wiki/index.php?Soundindex/Background%20Music%28BGM%29, Accessed December 2018.

[239] Occupant loads for open spaces are provided by the Project Applicant.

[240] American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012).

would be approximately 86 dBA L_{eq} at 3 feet. Based on a noise level source strength of 86 dBA L_{eq} at a reference distance of 3 feet, and accounting for distance attenuation of 6 dBA per doubling of distance and barrier-insertion loss by the existing buildings (minimum 15 dBA insertion loss), this outdoor area noise would be approximately 46 dBA at the closest multifamily residential use, (R1). The sound level from the background speakers is assumed to be approximately 71 dBA at 5 feet from the amenity deck on level 2 (5 dBA plus the noise levels of 66 dBA [R1, SW corner of 5th Street and Shatto Place], as shown in Table 5-21). Based on a noise level source strength of 71 dBA at a reference distance of 5 feet, and accounting for distance attenuation of 6 dBA per doubling of distance and barrier-insertion loss by the existing buildings (minimum 15 dBA insertion loss), sound levels from the background speakers would be approximately 35 dBA at the closest multifamily residential use, (R1). The combined noise levels of 46 dBA and 35 dBA would be approximately 46 dBA at the closest multifamily residential use, (R1), which would not exceed the significance threshold of 71 dBA (5 dBA plus the noise levels of 66 dBA [R1] as shown in Table 5-21).

The rooftop amenity deck located on level 30 of the mixed-use building would be fully open toward to multifamily residential uses (R4) to the north along 5th Street to the north. There would be spaces available for dining and lounging, with regulated daytime and evening hours. Under a conservative scenario, there could be up to approximately 100 visitors on the roof deck at one time.[241] Noise from human conversation is approximately 55 dBA at a reference distance of 3 feet. Assuming 50 visitors talking simultaneously, the continuous noise level would be up to 72 dBA at 3 feet. Based on a noise level source strength of 72 dBA at a reference distance of 3 feet, and accounting for distance attenuation of 6 dBA per doubling of distance and barrier-insertion loss by the Project buildings (minimum 10 dBA insertion loss), the roof deck noise would be approximately 38 dBA at the closest multifamily residences (R4). The sound level from the background music speakers is assumed to be approximately 66 dBA at 5 feet from the rooftop amenity deck on level 30 (5 dBA plus the noise levels of 61 dBA [R4, NW 5th Street and Westmoreland Avenue], as shown in Table 5-21). Based on a noise level source strength of 66 dBA at a reference distance of 5 feet, and accounting for distance attenuation of 6 dBA per doubling of distance and barrier-insertion loss by the Project buildings (minimum 10 dBA insertion loss), sound levels from the background speakers would be approximately 36 dBA at the closest multifamily residential use, (R4). The combined noise levels of 38 dBA and 36 dBA would be approximately 40 dBA at the closest multifamily residential use, (R4), which would not exceed the significance threshold of 66 dBA (5 dBA plus the noise levels of 61 dBA [R4], as shown in Table 5-21). As such, impacts would be less than significant.

At level 31, the swimming pool and spa area would be regulated by set day and evening hours. The noise from the swimming pool and spa would be shielded from off-site noise-sensitive receptors to the north by the Project's mixed-use tower. Under a conservative scenario, there could be up to approximately 100 people at the communal pool at one time.[242] Noise from human conversation is approximately 55 dBA at a distance of 3 feet and noise from children talking

[241] Occupant loads for open spaces are provided by the Project Applicant.

[242] Occupant loads for open spaces are provided by the Project Applicant.

loudly is approximately 74 dBA at a distance of 3 feet.[243] Assuming 50 adults and 50 children, with half of the people talking loudly simultaneously, the continuous noise level would be approximately 91 dBA L_{eq} at 3 feet. Based on a noise level source strength of 91 dBA L_{eq} at a reference distance of 3 feet, and accounting for distance attenuation of 6 dBA per doubling of distance and barrier-insertion loss by the Project buildings (minimum 10 dBA insertion loss), the communal pool related noise would be approximately 54 dBA L_{eq} at the multifamily residences, (R3). Sound levels from background music speakers would be approximately 66 dBA at 5 feet from the swimming pool and spa area on level 31 (5 dBA plus the noise levels of 61 dBA [R3, west side Westmoreland Avenue], as shown in Table 5-21). Based on a noise level source strength of 66 dBA at a reference distance of 5 feet, and accounting for distance attenuation of 6 dBA per doubling of distance and barrier-insertion loss by the Project buildings (minimum 10 dBA insertion loss), sound levels from amplified speakers would be approximately 34 dBA at the closest multifamily residential use, (R3). Combined noise levels of 54 dBA and 34 dBA would be approximately 54 dBA at the closest multifamily residential use, (R3), which would not exceed the significance threshold of 66 dBA (5 dBA plus the noise levels of 61 dBA [R3], as shown in Table 5-21). As such, impacts would be less than significant.

Composite Noise Level Impacts from Project Operations

An evaluation of the combined noise from the Project's various noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the noise-sensitive receptor locations included in this analysis. Noise sources associated with the Project would include traffic on nearby roadways, on-site mechanical equipment, emergency generator, parking structure, loading dock and refuse service areas, and open space areas.

Based on the location of the Project noise sources, the only noise-sensitive locations at which composite noise impacts could occur are the multifamily residences (R3) located to the east of the Project Site. The noise-sensitive location R3 is the nearest sensitive receptor and if a noise impact at the location R3 is less than significant, noise impacts at all other noise sensitive receptors will be less than significant because of distance attenuations. The predominant Project noise source that could potentially affect these off-site sensitive receptors would be noise-generating activities at loading dock and refuse service areas, mechanical equipment, emergency generators, open space activities, and parking structure.

Noise associated with activities in the refuse collection areas would not increase the overall ambient noise levels in the project vicinity. As shown in **Table 5-25**, *Composite Noise Levels at Sensitive Receptor Location R3 from Project Operations*, this analysis conservatively assumes that the Project's operational noise sources would generate maximum noise levels simultaneously. Therefore, the Project's operational composite noise would be less than significant with implementation of MM NOISE-4.

[243] American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012).

TABLE 5-25
COMPOSITE NOISE LEVELS AT SENSITIVE RECEPTOR LOCATION R3 FROM PROJECT OPERATIONS

	Noise Levels, dBA CNEL
Operational Noise Sources	**Location R3**
Existing (Ambient) Noise Level (A)	**61**
Project Composite Noise Sources	
Mechanical Equipment	51
Emergency Generator	55 a
Parking Structure	47
Loading and Refuse Service Areas	53
Open Spaces	54
Off-Site Traffic (6th Street between Shatto Place and Virgil Avenue)	
Future without Project traffic noise level	*67.9*
Future plus Project traffic noise level	*68.9*
Estimated Project-only traffic noise level	62.0
Project Composite Noise Level (B)	**64.0**
Existing Plus Project Composite Noise Level (C)	**65.8**
Project Increment (C-A)	4.8
Exceeds Threshold?	No

[a] Emergency generator noise levels are with implementation of MM NOISE-4.

SOURCE: ESA, 2018.

Conclusion:

Compliance with regulatory measures and implementation of project design features PDF NOISE-1, PDF NOISE-2, PDF NOISE-3, and PDF NOISE-4, and mitigation measures MM NOISE-1, MM NOISE-2, MM NOISE-3 and MM NOISE-4 would ensure a less than significant impact with respect to construction noise and operational noise impacts.

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

Less Than Significant with Mitigation Incorporated. The Project would be constructed using typical construction techniques. As such, it is anticipated that the equipment to be used during construction would not expose persons to or generate excessive groundborne vibration. Post-construction on-site activities would be limited to residential and commercial uses that would not generate excessive groundborne vibration.

Vibration Principles and Descriptors

Groundborne vibration from development is primarily generated from the operation of construction equipment and from vehicle traffic. Groundborne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration energy dissipates as

it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. Vibration in buildings is typically perceived as rattling of windows, shaking of loose items, or the motion of building surfaces. The vibration of building surfaces also can be radiated as sound and heard as a low-frequency rumbling noise, known as groundborne noise. Vibration levels for potential structural damage is described in terms of the peak particle velocity (PPV) measured in inches per second (in/sec).[244]

Groundborne vibration is generally limited to areas within a few hundred feet of certain types of industrial operations and construction/demolition activities such as pile driving. Road vehicles rarely create enough groundborne vibration amplitude to be perceptible to humans unless the receiver is in immediate proximity to the source or the road surface is poorly maintained and has potholes or bumps. If traffic, typically heavy trucks, does induce perceptible building vibration, it is most likely an effect of low-frequency airborne noise or ground characteristics.[245] Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Heavy trucks would generate 0.076 in/sec PPV at 25 feet. The vibration velocity of 0.076 in/sec PPV at 25 feet attenuates to 0.027 in/sec PPV at 50 feet.[246]

Building structural components also can be stressed by high levels of low-frequency airborne noise (typically less than 100 Hz). The many structural components of a building, stressed by low-frequency noise, can be coupled together to create complex vibrating systems. The low-frequency vibration of the structural components can cause smaller items such as ornaments, pictures, and shelves to rattle, which can cause annoyance to building occupants.[247]

Human sensitivity to vibration varies by frequency and by receiver. Generally, people are more sensitive to low-frequency vibration. Human annoyance also is related to the number and duration of events; the more events or the greater the duration, the more annoying it becomes. Groundborne vibration related to human annoyance is generally related to root mean square (rms) velocity levels, and expressed as velocity in decibels (VdB).[248]

As discussed above, the rumbling noise caused by the vibration of room surfaces is called groundborne noise. The annoyance potential of groundborne noise is usually characterized with the A-weighted sound level. Although the A-weighted level is almost the only metric used to characterize community noise, there are potential problems when characterizing low-frequency noise using A-weighting. This is because of the non-linearity of human hearing which causes sounds dominated by low-frequency components to seem louder than broadband sounds that have the same A-weighted level. The result is that groundborne noise with a level of 40 dBA sounds louder than 40 dBA broadband noise. This is accounted for by setting the limits for groundborne noise lower than would be the case for broadband noise.[249]

[244] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Section 7, May 2006.
[245] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Section 7, May 2006.
[246] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Section 12, May 2006.
[247] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Section 7, May 2006.
[248] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Section 7, May 2006.
[249] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Section 7, May 2006.

Regulatory Framework

The City of Los Angeles does not address vibration either in the LAMC or in the Noise Element of the General Plan. FTA has adopted vibration criteria that are used to evaluate potential structural damage to buildings by building category from construction activities. The FTA vibration damage criteria are shown in **Table 5-26**, *Construction Vibration Damage Criteria*.

TABLE 5-26
CONSTRUCTION VIBRATION DAMAGE CRITERIA

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

SOURCE: FTA, Transit Noise and Vibration Impact Assessment. May, 2006.
https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf, Accessed July 2018.

FTA has also adopted vibration criteria associated with the potential for human annoyance from groundborne vibration for the following three land-use categories: Category 1 – High Sensitivity, Category 2 – Residential, and Category 3 – Institutional. FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment but still have the potential for activity interference. The vibration criteria associated with human annoyance for these three land-use categories are shown in **Table 5-27**, *Groundborne Vibration Impact Criteria for General Assessment*. No vibration criteria have been adopted or recommended by FTA for commercial and office uses.

TABLE 5-27
GROUNDBORNE VIBRATION IMPACT CRITERIA FOR GENERAL ASSESSMENT

Land Use Category	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[d]	65 VdB[d]	65 VdB[d]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

[a] "Frequent Events" is defined as more than 70 vibration events of the same source per day.
[b] "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.
[c] "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.
[d] This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes.

SOURCE: FTA, Transit Noise and Vibration Impact Assessment. May, 2006.
https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf, Accessed July 2018.

According to the FTA, groundborne vibrations from construction activities very rarely reach the level that can damage structures. A possible exception is the case of old, fragile buildings of historical significance where special care must be taken to avoid damage.[250] The construction activities that typically generate the most severe vibrations are blasting and impact pile driving, which would not be utilized for the Project. The Project would utilize construction equipment such as use of bulldozers and excavators, which would generate groundborne vibration during excavation and foundation activities. Based on the vibration data by the FTA, typical vibration velocities from the operation of a large bulldozer would be approximately 0.089 inches per second PPV at 25 feet from the source of activity.[251]

Construction Vibration

The existing buildings located to the east of the Project Site at location R3 are located approximately 5 feet from the eastern side of the Project Site. These buildings could be exposed to vibration velocities of up to 0.99 inches per second PPV. These values would exceed the 0.3 inches per second PPV significance threshold for potential building damage (potential building damage for engineered concrete and masonry buildings). Therefore, potential building damage vibration impacts during the excavation phase would be potentially significant without implementation of mitigation measures.

The school use to the southwest of the Project Site (R2) would be located approximately 150 feet from the Project site. The school uses (R2) would be exposed to vibration levels of up to 0.006 inches per second PPV which would be well below the 0.5 inches per second PPV significant threshold for potential building damage for reinforced-concrete, steel, or timber buildings. Therefore, vibration impacts would be less than significant on the school use (R2).

As discussed in Item 5.5, *Cultural Resources*, the former church building on the Project Site was constructed in 1936 and was identified by SurveyLA, the citywide historic resources survey

[250] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Section 7, May 2006.
[251] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Section 12, May 2006.

overseen by the City of Los Angeles' Office of Historic Resources, as significant for its Spanish Colonial Revival architecture. Therefore, the former church building is treated as a historical resource as defined by CEQA. In addition, there are two properties in the Project Vicinity at 3109 W. 6th Street and 523 S. Westmoreland Avenue that were identified as potential historical resources by SurveyLA. The building at 3109 W. 6th Street was identified as eligible for the California Register as a rare intact example of early commercial development located along a former streetcar line in the Wilshire area. The 1936 former church building could be as close as approximately 5 feet from construction activities. The historic buildings, including the 1936 church, 3109 W. 6th Street building, and 523 S. Westmoreland Avenue building, would be exposed to vibration velocities of up to 0.99 inches per second PPV. These values would exceed the 0.5 inches per second PPV significance threshold for potential building damage for the former church building (potential building damage for reinforced-concrete, steel, or timber buildings) and the 0.3 inches per second PPV significance threshold for potential building damage for the two properties in the Project Vicinity at 3109 W. 6th Street and 523 S. Westmoreland Avenue (potential building damage for engineered concrete and masonry buildings). Therefore, vibration impacts during the excavation phase would be potentially significant without implementation of mitigation measures.

With respect to potential human annoyance from vibration, the multifamily residential uses to the east of the Project Site (R3), would be located approximately 5 feet from the Project Site property lines, and could be exposed to groundborne vibration levels of up to 108 VdB from the use of a large bulldozer, which would exceed the 72 VdB threshold for human annoyance.[252] The multifamily residential uses to the north and northeast of the Project Site (R1 and R4) would be located approximately 270 feet and 150 feet, respectively, from the Project Site. These multifamily residential uses would be exposed to vibration levels of up to 58 VdB which would be below the 72 VdB perception threshold for human perception. Similarly, the school uses to the southwest of the Project Site (R2) would be located approximately 150 feet from the Project Site would be exposed to vibration levels of up to 58 VdB which would be below the 72 VdB perception threshold for human perception. Therefore, vibration impacts for human annoyance would be potentially significant for the multifamily residential uses at R3 and less than significant for the multifamily residential uses at R1 and R4 and less than significant for the school uses at R2.

As discussed previously, the relationship between groundborne vibration and groundborne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration results in groundborne noise levels that are approximately 25 to 40 decibels lower than the velocity levels.[253] According the FTA *Transit Noise and Vibration Impact Assessment*, most of the studies of groundborne vibration in this country have focused on urban rail transit and the problems with groundborne vibration and noise that are common when there is less than 50 feet between a subway structure and building foundations. Project construction would not create on-going and continuous groundborne vibration and noise like that of an urban rail transit system. Project construction would generate intermittent or periodic groundborne vibration and noise, which means that

[252] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Table 8-1, May 2006.
[253] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, page 7-6, May 2006.

groundborne vibration and noise impacts would be less than those of an urban rail transit system. However, as discussed above, the nearest noise-sensitive uses, represented by receptor location R3, could be exposed to groundborne vibration levels of up to 108 VdB from the use of a large bulldozer, which would exceed the 72 VdB threshold for human annoyance.[254] As stated above, groundborne vibration results in groundborne noise levels approximately 25 to 40 decibels lower than the velocity level.[255] Nonetheless, since groundborne noise is a direct result of groundborne vibration, groundborne noise would be considered significant if not mitigated as follows:

Mitigation Measures

MM NOISE-5: The Project shall implement construction vibration reduction strategies to reduce vibration levels from construction affecting vibration-sensitive receptors to the east of the Project Site, with a performance standard of achieving a construction vibration level of less than 0.5 inches per second PPV at the face of the on-site former church building, less than 0.3 inches per second PPV at the face of the 3109 West 6th Street building and the 523 South Westmoreland Avenue building, and 72 VdB or less at occupied vibration-sensitive residential receptors adjacent to the east of the Project Site. Vibration reduction strategies shall include one or a combination of the following to achieve the performance standards.

- Use construction equipment, fixed or mobile, that individually generates less vibration than presumed in the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual. Examples of such equipment are medium, compact, small, or mini model versions of bulldozers, drills, or trucks; or newer model equipment with lower vibration levels; or other applicable equipment that are equipped with reduced vibration-generating engines. Construction equipment vibration levels shall be documented based on manufacturer's specifications or other equipment or testing documentation. The construction contractor shall keep construction equipment vibration level documentation on-site for the duration of Project construction.
- Prior to obtaining a building permit, the effectiveness of the vibration reduction strategies to achieve the performance standard shall be documented in a vibration study conducted by a qualified acoustical/vibration engineer based on detailed Project plans for Plan Check.

MM NOISE-6: Prior to construction, the Applicant shall retain the services of a qualified acoustical/vibration engineer to review the proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the on-site former church building, the 3109 West 6th Street building, and the 523 South Westmoreland Avenue building.

- The Applicant and qualified acoustical/vibration engineer shall conduct a pre-construction survey that visually identifies the existing conditions of the on-site former church building, the 3109 West 6th Street building, and the 523 South Westmoreland Avenue building.
- During construction, the contractor shall install and maintain at least one continuously operational automated vibrational monitors on the on-site former church

[254] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Table 8-1, May 2006.

[255] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, page 7-6, May 2006.

building, the 3109 West 6th Street building, and the 523 South Westmoreland Avenue building. The monitors shall be capable of being programmed with two predetermined vibratory velocities levels:

- On-site former church building: a first-level alarm equivalent to a 0.48 inches per second PPV at the face of the on-site former church building and a regulatory alarm level equivalent to 0.5 inches per second PPV at the face of the on-site former church building.
- 3109 West 6th Street building and the 523 South Westmoreland Avenue building: a first-level alarm equivalent to a 0.28 inches per second PPV at the face of the 3109 West 6th Street building and the 523 South Westmoreland Avenue building and a regulatory alarm level equivalent to 0.3 inches per second PPV at the face of the 3109 West 6th Street building and the 523 South Westmoreland Avenue building.

- The monitoring system shall produce real-time specific alarms (for example, via text message and/or email to on-site personnel) when velocities exceed either of the predetermined levels. In the event of a first-level alarm, feasible steps to reduce vibratory levels shall be undertaken, including but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the event of an exceedance of the threshold level, the contractor shall review the construction work in the vicinity and investigate construction methods that would reduce vibration levels in the vicinity. If it is determined that the construction work is causing an exceedance of the vibration threshold level, the contractor shall also visually inspect the on-site former church building, the 3109 West 6th Street building, and the 523 South Westmoreland Avenue building for damage. Results of the inspection shall be logged. In the event damage occurs to finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant, and if warranted, in a manner that meets the Secretary of the Interior's Standards.

In addition, the Historical Resource Assessment Report[256] includes a mitigation measure to reduce the potential impacts to the buildings during construction:

> **MM NOISE-7:** Prior to the issuance of grading permits, the Applicant will provide a shoring plan prepared by a qualified structural engineer who meets the relevant Secretary of the Interior's Professional Standards, for review and approval by the City of Los Angeles. The shoring plan will ensure the protection of the on-site former church building on the Project Site, as well as the potential historic resources adjacent to the Project Site at 3109 West 6th Street and 523 South Westmoreland Avenue, during construction.

Small construction equipment would generate vibration velocity of 0.035 inches per second PPV at 25 feet from the small construction equipment. The vibration sensitive receptors located 50 feet from the construction equipment would be exposed to vibration velocities up to 0.012 inches per second PPV or 70 VdB. Implementation of the above mitigation measure, MM NOISE-5, which requires meeting the established performance standards, would reduce the maximum vibration impact associated with construction activities to a less-than-significant level of 0.5 inches per second PPV and 0.3 inches per second PPV, respectively, at the identified buildings for potential

[256] Historic Resources Group, Historic Resource Assessment Report, 550 S. Shatto Place, Los Angeles, November, 2018.

building damage and 72 VdB for human perception. Implementation of the above mitigation measure, MM NOISE-6 would require the Project to conduct a pre-construction survey for building damage and provide repairs in the event vibration from construction of the Project causes building damage at the identified vibration-sensitive buildings. As such, potentially significant impacts would be reduced to a less-than-significant level with mitigation incorporated.

Operation

Once construction activities have been completed, there would be no substantial sources of vibration activities from the Project Site. The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, emergency generator, and exhaust fans, which would produce limited levels of vibration. In addition, the primary source of transient vibration would include passenger vehicle circulation within the proposed parking area, delivery and trash trucks, and moving vans, which also produces limited levels of vibration. This source would generate substantially lower levels of vibration than those identified above for construction.

The above-mentioned groundborne vibration sources associated with the Project's fixed mechanical equipment would generate groundborne vibration of up to 45 VdB at the nearest vibration-sensitive residential buildings, which would not exceed the threshold of 72 VdB for human annoyance.[257] Since groundborne noise is a direct result of groundborne vibration, groundborne noise would also be considered less than significant.

Conclusion:

With compliance with existing regulatory compliance measures and MM-Noise-5 to MM Noise-7, groundborne vibration and groundborne noise impacts to structures and on human perception during Project operation would be reduced to less than significant.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip or an airport land use plan area or within 2 miles of a public airport or public use airport. Therefore, construction or operation of the Project would not expose people to excessive airport related noise levels.

Conclusion:

No impact would occur in this regard and no mitigation measures are required.

[257] America Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc., Heating, Ventilating, and Air-Conditioning Applications, 1999.

Cumulative Impacts: Noise

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and sound reduces significantly in magnitude as the distance from the source increases. With respect to on-site construction noise and on-site operational noise sources, only related projects expected to occur within the immediate vicinity of the Project Site could contribute to cumulative noise impacts. With respect to off-site construction noise and the Project's operational traffic noise impacts, related projects expected to occur in the broader area could contribute to cumulative impacts with the Project.

Construction Noise

Noise from on-site construction activities of the Project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet from the construction sites. One related project in the surrounding area has been identified within approximately 500 feet of the Project. The Vermont Corridor Project is a mixed-use project with office, retail and restaurant uses, which at its closest point is approximately 90 feet west of the Project Site located on the east side of Vermont Avenue north of 6th Street.[258] Construction of this related project could potentially combine its on-site construction noise levels with the noise from the Project's on-site construction activities. However, like the Project, this related project would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. In addition, this related project would be subject to LAMC Section 112.05, which prohibits any powered equipment or powered hand tools from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically feasible. Furthermore, this related project is County-owned and subject to the County's construction noise standards in County Code Section 12.08.440, Construction Noise, which prohibits construction equipment during weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound there from creates a noise disturbance across a residential or commercial real-property line. Section 12.08.440 includes construction noise limits based on the duration of equipment use (i.e., short- or long-term), type of land use, (i.e., single-family residential, multifamily residential, or semi-residential/ commercial) and the time period with daytime construction noise limit of 75 dBA at single-family residences, 80 dBA at multifamily residences, and 85 dBA at semi-residential/commercial areas.

As previously discussed, potentially significant noise impacts during Project construction would be reduced to a less-than-significant level through compliance with applicable regulations, implementation of the Project's PDFs, and implementation of the identified mitigation measures. The Vermont Corridor Project may have a construction schedule similar to the Project's. The EIR for the Vermont Corridor Project concluded that with mitigation, its construction impacts would be less than significant after implementation of feasible mitigation at the multifamily residential uses (R1) to the north of the Project Site and at the school uses to the southwest of the Project Site. The construction of Vermont Corridor Project would not increase the ambient noise levels at

[258] County of Los Angeles, Draft Environmental Impact Report: Vermont Corridor Project, Section 4.10 Noise, November 2017. Available at: https://www.lacdc.org/docs/default-source/economic-dev/vermont-corridor/4-10-noise-(vermont-corridor)-public-review-deir-110317.pdf?sfvrsn=870884bd_2. Accessed December 2018.

the multifamily residential uses (R1) but would increase the ambient noise levels by up to 2.2 dBA at the school uses (R2).[259] As shown in Table 5-22, Project construction noise levels would be well below the significance threshold of 75 dBA at the school uses (R2). Therefore, if construction of the Vermont Corridor Project were to overlap with construction of the Project, cumulative construction noise impacts would not occur. All other related projects are located more than 500 feet from the Project Site and would not contribute substantially to cumulative on-site construction noise impacts. Furthermore, related projects would be required to comply with City noise standards and implement mitigation measures for identified significant impacts, as required under CEQA, similar to the Project. As such, cumulative impacts associated with on-site construction noise would be less than significant.

By contrast to cumulative on-site construction noise impacts, cumulative off-site construction noise impacts created by construction traffic from the related project can contribute to noise levels on major thoroughfares throughout the area. However, because the timing of the construction activities for the related project cannot be ascertained or predicted without engaging in speculation, and since that timing is beyond the control of both the City and the Applicant, a quantitative analysis that assumes that the related project would be under construction concurrently would be entirely speculative such that a qualitative analysis is appropriate.

Off-site construction noise impacts from the related project could only combine with the Project's off-site construction noise impacts if the related projects were under construction concurrently with the Project. The Vermont Corridor Project is required to implement mitigation measure MM NOI-5 as specified in its EIR, which restricts construction truck traffic to truck routes approved by the City of Los Angeles Department of Building and Safety and that avoids residential areas and other sensitive receptors to the extent feasible.[260] Similar to the Proposed Project, the related project applicant would also be required to prepare and submit to LADOT for approval a construction management plan that would be based on the nature and timing of the specific construction and other projects in the vicinity of the development site. Further, each project applicant would be required to schedule construction-related deliveries to reduce travel during peak travel periods, which would minimize the noise impacts.

Conclusion:

Cumulative off-site construction traffic noise impacts would not be cumulatively considerable

Operational Noise

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and the related projects. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the Project to the future cumulative base traffic volumes in the Project vicinity. The noise levels associated with cumulative base traffic volumes

[259] County of Los Angeles, Environmental Impact Report: Vermont Corridor Project, Section 4.10 Noise, November 2017. Available at: https://www.lacdc.org/docs/default-source/economic-dev/vermont-corridor/4-10-noise-(vermont-corridor)-public-review-deir-110317.pdf?sfvrsn=870884bd_2. Accessed December 2018.

[260] County of Los Angeles, Environmental Impact Report: Vermont Corridor Project, Mitigation Monitoring and Reporting Program, May 2018. Available at: https://www.lacdc.org/docs/default-source/economic-dev/vermont-corridor/vermont-corridor---final-environmental-impact-report.pdf?sfvrsn=829380bd_2. Accessed December 2018.

with the Project are identified above in Table 5-24. The largest cumulative (Project plus ambient growth plus other known related projects in the vicinity of the Project Site) roadway noise impact would be 69.9 dBA CNEL, which is predicted to occur along Vermont Avenue, between 3rd Street and 4th Street. Along this roadway segment the off-site roadway traffic volumes associated with the Project would result in a maximum increase in CNEL of 1.5 dBA over existing conditions. Therefore, with respect to roadway noise, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Compliance with LAMC Section 112.02 that limits stationary-source noise from items such as roof-top mechanical equipment, operational noise levels would be less than significant at the property line for each related project. For this reason, on-site operational noise produced by any related project would not result in a substantial or noticeable additive increase to Project-related on-site operational noise levels.

Conclusion:

As the Project's composite stationary-source impacts would be less than significant with implementation of MM NOISE-4, its contribution to cumulative impacts would not be cumulatively considerable.

Groundborne Vibration and Noise

With respect to groundborne vibration the nearest residential building contains the multifamily residences (R3) to the east of the Project, which is approximately 5 feet from the Project Site. These residences would be exposed to vibration velocities up to 0.99 inches per second PPV. These values would exceed the 0.3 inches per second PPV significance threshold for structural damage. The residences would be also exposed to groundborne noise levels up to 108 VdB. However, with the incorporation of mitigation measure, MM NOISE-5, the Project would reduce the maximum vibration impact associated with construction activities to a less-than-significant level. Construction of the Vermont Corridor Project was determined to result in a less-than-significant impact for vibration.[261] At a distance of 90 feet and greater, vibration levels from the Vermont Corridor Project would not exceed building damage or human annoyance thresholds. Furthermore, the distance from the Vermont Corridor Project and the multifamily residential uses at R3 is approximately 300 feet, which would result in substantial attenuation of vibration. As such, the Project and the Vermont Corridor Project would not result in a cumulatively considerable vibration impact at the nearest sensitive receiver to both projects.

As discussed above, the groundborne vibration and groundborne noise associated with the Project's operation would not generate excessive groundborne vibration and groundborne noise levels. Accordingly, operation of the Vermont Corridor Project would not cause significant operational groundborne vibration and groundborne noise impacts with the Project.

[261] County of Los Angeles, Environmental Impact Report: Vermont Corridor Project, Section 4.10 Noise, November 2017. Available at: https://www.lacdc.org/docs/default-source/economic-dev/vermont-corridor/4-10-noise-(vermont-corridor)-public-review-deir-110317.pdf?sfvrsn=870884bd_2. Accessed December 2018.

Conclusion:

Cumulative operational groundborne vibration and groundborne noise impacts would not be cumulatively considerable.

5.14 Population and Housing

Would the project:

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

Less Than Significant Impact. A significant impact could occur if the Project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. The Project would provide infill replacement development within a currently developed urban setting. It would not add new infrastructure beyond that required to connect the Project to existing utility lines, and adjacent roadways. Therefore, the Project would not directly or indirect induce unplanned population growth.

The Project would replace the existing school uses with new residential, office, and commercial uses. The Project's mix of uses would result in a reduced employment population at the Project Site and an increase in resident population and housing units. The Project would provide 256 residential units (inclusive of 29 units that would be restricted for Extremely Low Income households), 12,800 sf of commercial uses, and 2,507 sf of office uses. The changes in Project Site population are reported in **Table 5-28**, *Estimated Population Growth*. The estimated household size for converting the Project's number of residences to a Project Site population, 2.43 people per household, reflects the Citywide Person Per Household factor for multifamily units as published in the 2016 American Community Survey.

TABLE 5-28
ESTIMATED POPULATION GROWTH

Use	Units or Square Feet	Average Household Size[a] or Employment Generation Factor[b]	Total Population or Employees
Existing Development			
Existing School			28c
Proposed Residential	256	2.43	622
Employment			
Proposed Restaurant	12,800	0.00271/1,000 sf	35
Proposed Office	2,507	0.00479/1,000 sf	13
Total Employment			*48*
Net Employment Increase			**+20**

[a] The average household size reflects the Citywide Person Per Household factor for multifamily units, provided by the Department of City Planning Demographics Unit (e-mail from Jonathan Chang to Jessie Fan, ESA, February 8, 2018), and as published in the 2016 American Community Survey.

[b] The employee generation factors for commercial uses is based on the retail employee generation factor included in the Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202018%20FINAL.pdf.

[c] Based on staff information provided at https://www.e-nca.org/about/staff.cfm. Accessed Oct 1, 2018. An additional 3 employees were assumed for janitorial/landscaping services.

SOURCE: ESA, 2018.

As indicated, in Table 5-28, the Project's 256 residential units are estimated to result in a residential population of approximately 622 residents. As the Project would replace existing school uses with new restaurant and office employment, the Project would result in a net increase of 20 employees.

The interpolated 2018 baseline population, housing and employment estimates for the City of Los Angeles, the estimated growth projections for 2021 (Project buildout year), and SCAG's 2040 growth projections (SCAG Projection Horizon), all based on the SCAG 2016 RTP/SCS,[262] are shown below in **Table 5-29**, *Projected Population, Housing and Employment Estimates for the City of Los Angeles*, and are discussed in more detail below.[263] As shown in Table 5-29, the City's population is expected to grow by 1.8 percent, the number of households/occupied housing units is expected to increase by 2.9 percent, and the number of employees is expected to grow by 3.5 percent between 2018 and 2021.

[262] http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf Accessed November 21, 2018

[263] The 2018 baseline estimates were determined by interpolating from data presented in the SCAG projections based on values provided for 2012 and 2020. The 2018 estimate is calculated by: [((2020 data – 2012 data) / 8 years) * 6 years)] + 2012 data = 2018 baseline estimate. The 2021 estimate is calculated by: [((2035 data – 2020 data) / 15 years) * 1 years)] + 2020 data = 2021 buildout estimate. The 2040 estimates are provided by SCAG.

TABLE 5-29
PROJECTED POPULATION, HOUSING AND EMPLOYMENT ESTIMATES FOR THE CITY OF LOS ANGELES

		2021 (Project Buildout Year)			2040 (SCAG Projection Horizon)		
	2018 (Project Baseline)	Projected	Total Growth	Percentage Increase as Compared to 2018	Projected	Total Growth	Percentage Increase as Compared to 2018
Population	3,974,125	4,045,367	71,242	1.8%	4,609,400	635,275	16.0%
Housing	1,412,425	1,453,233	40,808	2.9%	1,690,300	277,875	19.7%
Employment	1,848,725	1,913,140	64,415	3.5%	2,169,100	320,375	17.3%

SOURCE: Based on SCAG data prepared for the 2016 RTP/SCS. Compiled by ESA, 2018.

As shown in Table 5-28, the Project is estimated to result in a new residential population of approximately 622 residents and 20 net new employees. These Project contributions are compared, in **Table 5-30**, *Project Population, Housing, and Employment Impacts for the City of Los Angeles*, to the growth projections shown in Table 5-29 from the SCAG 2016 RTP/SCS for the City.

TABLE 5-30
PROJECT POPULATION, HOUSING, AND EMPLOYMENT IMPACTS FOR THE CITY OF LOS ANGELES

	Project Increase[a]	SCAG Projected Growth[b]	Project Percentage of Growth
Population			
2018–2021 Buildout	622	71,242	0.9%
2018–2040 Projection Horizon	622	635,275	0.1%
Households			
2018–2021 Buildout	256	40,808	0.6%
2018–2040 Projection Horizon	256	277,875	0.1%
Employment			
2018–2021 Buildout	20	64,415	>0.1%
2018–2040 Projection Horizon	20	320,375	>0.01%

[a] From Table 5-26
[b] From Table 5-27

SOURCE: ESA, 2018. Based on SCAG 2016 RTP/SCS projections.

As shown in Table 5-30, the Project's estimated 622 residents would be well within, and would comprise less than 1.0 percent of, SCAG's estimated 2021 population growth of 71,242 persons. SCAG's longer-term projected 2040 population increase for the City area is 635,275 residents, for a total residential population of 4,609,400; the Project's residential population would also be well within, comprising approximately 0.1 percent of, SCAG's total population increase for the City between 2018 and 2040.

The Project would induce planned population growth directly through the introduction of 256 housing units on the Project Site, which currently has no residential uses. However, as Table 5-30 shows, the Project's 256 housing units would be well within SCAG's year 2021 estimated increase of 40,808 households within the City, and would comprise 0.6 percent of that figure. The Project's new housing units would also be well within SCAG's 2040 estimated increase of 277,875 households within the City, and would comprise 0.1 percent of that figure.

As shown in Table 5-30, the Project's contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services.

In addition, the Project's growth would contribute toward the attainment of City and regional goals and policies to encourage housing development in the greater Los Angeles area. In particular, Objective 4.2 of the Housing Chapter states that the City should "[e]ncourage[s] the location of new multifamily housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods."[264]

Improving the jobs/housing balance is one tool for reducing impacts on the environment by reducing VMT. The ratio of jobs to housing is one indicator of proximity between employment and residential locations for population in the region. The jobs/housing ratio for the entire SCAG region is approximately 1.35.[265] That is, there are approximately 1.35 jobs for each household unit. Large variations from this ratio in local communities indicate whether the communities are housing-rich (i.e. bedroom communities) or employment-rich. Bedroom communities require longer commuting distances between home and work. Communities whose ratios are closer to 1.35 have more of a balance between residents and employees within their boundaries.

Based on the 2018 employment and household estimates presented in Table 5-28, above, the 2018 jobs/housing ratio in City is 1.3089, rounded to 1.31. The projected 2021 estimate for the City would be increased slightly to 1.3165, which would still be rounded to 1.31. Based on the information in Table 5-29, above, the Project's net new jobs/housing ratio would be 0.078, which means that the Project would be housing-rich. Thus, the Project would contribute to an improvement in the jobs/housing balance by providing a large number of housing but only a few new jobs. In combination with the rest of the City, the jobs/housing ratios for both 2018 and 2021would remain similar at 1.31. The Citywide jobs/housing ratio for 2040 with the Project would be slightly reduced at approximately 1.28.

[264] City of Los Angeles, General Plan Framework, Chapter 4 Housing, Goals, Objectives, and Policies. https://planning.lacity.org/cwd/framwk/chapters/04/04.htm Accessed November 21, 2018.

[265] SCAG, 2016 RTP/SCS, Demographics & Growth Forecast Appendix. Based on 2015 employment of 8,006,000 as presented in Table 8, Regional Population and Employment by County, page 18; and 5,947,000 households as presented in Table 4, Characteristics of Regional Households, page 8. http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf Accessed November 21, 2018.

As stated above, the Project's development is located within a HQTA, and would help the City increase planned housing growth in its HQTAs. While HQTAs account for only three percent of the total land area in SCAG's region, HQTAs are expected to accommodate 46 percent and 55 percent of future household and employment growth, respectively, between 2012 and 2040.[266] Developments within HQTAs are intended to produce high-quality housing with consideration to urban design, construction, and durability, and result in increased ridership on important public transit investments. The Project Site is located approximately 500 feet from the Metro Wilshire/Vermont Metro Rail Station and close to other modes of transit.

The Project is also substantially consistent with City and regional policies regarding the location of development and preferred development patterns for the region. The SCAG Regional Housing Needs Assessment (RHNA), as addressed in the City's General Plan Housing Element identifies needed housing stock to meet the regional housing needs. The most recent RHNA allocation identifies housing needs for the planning period between January 2014 and October 2021. The City's 2013-2021 Housing Element is based on the updated 2012 RHNA. Table 1.29 of the Housing Element provides a City needs assessment allocation of 82,002 housing units of which 35,412 units, or 43.2 percent, would be for above moderate income households. The remaining needs include 10,213 very low-income units (12.5 percent). The Project would provide 256 new residential units, including 29 units that would be restricted for Extremely Low Income households. Thus, the Project would support the RHNA by contributing to both the overall housing supply and to the availability of housing for Extremely Low Income households.

Therefore, for all of the above reasons, the Project's provision of residential development at the Project Site is substantially consistent with the planned growth and sustainability policies of SCAG's 2016 RTP/SCS, which are to create denser communities connected by public transportation. The Project Site is also located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQTA and TOD; the population growth generated by the Project is considered to be substantially consistent with the City's and SCAG's growth policies.

Conclusion:

Impacts with respect to inducing substantial unplanned population growth would be less than significant and no mitigation measures are required.

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

No Impact. The Project Site is currently developed with existing school-related buildings and a surface parking lot. There are no housing units or people dwelling on the Project Site. No housing would be removed or destroyed, and no displacement would occur.

[266] SCAG, 2016 RTP/SCS, page 75. Accessed November 21, 2018.

Conclusion: No impact would occur with respect to the displacement of people or housing that would necessitate the construction of replacement of housing elsewhere. No mitigation measures are required.

Cumulative Impacts: Population and Housing

Of the 118 development projects on the related projects list, 95 include residential components. These 95 related projects with residential components include a total of 15,822 housing units with a corresponding population of 38,931 persons, without taking into account any existing residential units that might be demolished to allow for development of the related projects.

When combined with the Project's 256 net new units and increase of 622 in population, the total number of housing units is 16,078 units and the total population would be 39,553. The total number of employees for the related projects would be 4,108 employees and, when combined with the Project's 20 net new employees, the total number of employees would be 4,128.

Table 5-31, *Cumulative Population, Housing, and Employment Growth within the City of Los Angeles*, compares the growth of these related projects, together with the Project, to the 2016 RTP/SCS 2040 horizon year projections. The projections focus on the SCAG 2016 RTP/SCS 2040 horizon year as opposed to the Project's 2021 buildout date, since it would be speculative to make assumptions with respect to the buildout dates for each of the related projects used in this analysis. Additionally, SCAG projections incorporate regional policies and are based on long-term demographic trends.[267] The 2040 horizon year serves as the basis for preparation of SCAG's long-range regional plan, policies and strategies for transportation improvements and regional growth throughout the SCAG region. The 2040 projections also serve as a basis for the planning of services, utilities and other infrastructure improvements by regional agencies and local jurisdictions.

TABLE 5-31
CUMULATIVE POPULATION, HOUSING, AND EMPLOYMENT GROWTH WITHIN THE CITY OF LOS ANGELES

	Cumulative Increase Including Proposed Project	SCAG Projected Growth[a]	Cumulative Percentage of Growth
Population	39,553	635,275	6.2%
Households	16,078	277,875	5.8%
Employment	4,128	320,375	1.3%

[a] From Table IV.J-1.

SOURCE: ESA, 2018.

The 2040 projections take into account long term regional development trends. Actual development within shorter time frames or localized areas may vary slightly from the projected rates, but short-term variations average out over time. SCAG's regular monitoring of factors

[267] SCAG, 2016 RTP/SCS, page 13.

affecting growth in the region, allows the projections to remain suitable for use by service agencies for their long term planning.

The cumulative growth shown in Table 5-31 reflects a broad mix of development including residential, office and retail uses, as well as miscellaneous uses including museums and community centers. The related projects would be implemented over a longer time period than the expected buildout date of the Project, with many developments consisting of longer range plans for development and/or phased developments that would extend further out in time.

The Koreatown area is currently developed with a substantial infrastructure system in place to meet the needs of current and anticipated development, consistent with growth patterns identified in applicable SCAG and City plans. Further, the cumulative development is within the planned growth estimates and growth distribution patterns accounted for within the SCAG projections and policies. As reported in Table 5-31, the estimate of cumulative growth for population, housing, and employment is well within the projected estimates for the City. The estimate of cumulative population growth in the larger Project Site vicinity, the 39,553 new people to the area, constitute 6.2 percent of the population growth for the 2040 horizon year. The 16,078 cumulative dwelling units within the City constitutes 5.8 percent of SCAG's projected housing growth in the City by 2040. The employment population associated with the cumulative growth would represent 1.3 percent of the projected new employment population Citywide by year 2040.

All the related projects are being proposed and/or developed in existing, developed areas, and would be consistent with plan policies that serve as a guide for providing services and infrastructure. The cumulative development in the City will provide opportunities for residents to locate within the HQTA, and more particularly the Koreatown area with its substantial transit facilities, thus reducing demand for development in lower-density areas of Los Angeles and achieving greater efficiency in the provision and use of services and infrastructure, in keeping with SCAG goals and policies.

Furthermore, the calculation of estimated housing growth, population growth, and employment growth is conservative as many of the related projects are replacement projects, without netting out existing development; some of the related projects may have been completed and accounted for in existing population estimates; and some of the related projects may not be developed at all.

As discussed above, the projected cumulative population, household, and employment growth would be within the 2040 SCAG projections identified in the 2016 RTP/SCS for the City, in an area that is currently built out with existing infrastructure intended to be the site of future planned growth.

Conclusion:

There would be a less than significant cumulative impact from unplanned population and housing growth or from displacing substantial numbers of existing people or housing that would require replacement housing elsewhere and would not be cumulatively considerable.

5.15 Public Services

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

a. Fire protection?

Less Than Significant Impact. Significant impacts to fire protection and emergency services would occur if the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

Fire protection and emergency medical services for the Project Site are provided by the City of Los Angeles Fire Department (LAFD). The LAFD's approximately 3,246 uniformed personnel and 353 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service.[268] At any given time, there are approximately 1,018 uniformed firefighters, including 270 firefighter/paramedics, on-duty at 106 fire stations across the LAFD's 471 square-mile jurisdiction.[269] LAFD fire stations within the proximity of the Project Site include Fire Station 6, Fire Station 11, and Fire Station 13.[270] **Table 5-32**, *LAFD Fire Stations Located in the Vicinity of the Project Site*, provides information on the location, the approximate distance/direction from the Project Site and the average response time.

Construction

Construction activities associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, covering and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Further, fire suppression equipment specific to construction would be maintained on the Project Site. As applicable, construction activities would be required to comply with the 2016 California Building Code (CBC), the California Fire Code (CFD), and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public Safety and Protection, of the LAMC.

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[268] Los Angeles Fire Department, Department, Overview, Website, http://lafd.org/about/lafd-overview, accessed September 22, 2018.

[269] These figures represent the number of uniformed firefighters that are available to respond to emergency calls and do not include other on-duty uniformed firefighters that are involved in training or various administrative and support functions (Source: Los Angeles Fire Department, Department Overview, http://lafd.org/about/lafd-overview, accessed September 22, 2018

[270] Los Angeles Fire Department, Fire Stations, Find Your Station, Website http://www.lafd.org/fire-stations/find-your-station, accessed May 2018 and Google Maps, accessed September 22, 2018.

TABLE 5-32
LAFD FIRE STATIONS LOCATED IN THE VICINITY OF THE PROJECT SITE

Fire Station[a]	Address[a]	Approximate Distance/Direction from Project Site	Average Response Time[b]
Fire Station 6	326 North Virgil Avenue	0.95 miles	6:17 (EMS) 5:55 (non EMS) 4:31 (Structural Fire) 5:09 (Critical ALS)
Fire Station 11	1819 West 7th Street	1.1 miles	5:54 (EMS) 5:31 (non EMS) 4:52 (Critical ALS) 4:05 (Structure Fie)
Fire Station 13	2401 West Pico Boulevard	1.3 miles	6:04 EMS 5:35 (non-EMS) 4:59 (Critical ALS) 4:38 (Structure Fire)

Structural Fire: The type of call reserved when the LAPD receives a report of a building or structure that is actively burning.
EMS = Emergency Medical Services; ALS = Advanced Life Support

SOURCES:
a. From January to August 2018. LAFD, Find Your Station. http://www.lafd.org/fire-stations/find-your-station. Accessed September 2018.
b. FIRESTATLA http://www.lafd.org/fsla/stations-map. Accessed September 22, 2018.

Construction activities may involve temporary lane closures for right-of-way frontage improvements and utility construction. Construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could increase response times for emergency vehicles to local businesses and/or residences within the Project vicinity, due to travel time delays to through traffic. However, the impacts of such construction activity would be less than significant on a temporary and on an intermittent basis. To ensure impacts are minimized, a Construction Management Plan (MM TRAF-1) would be prepared for the Project, which is consistent with standard City requirements. The Plan would be prepared to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. Truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the City of Los Angeles Department of Public Works prior to construction activities. The Construction Management Plan would be prepared for review and approval by the City of Los Angeles Department of Public Works prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic, are expected to limit the potential for significant delays in emergency response times during Project construction.

Construction is not considered to be a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires should they occur. Due to the limited duration of construction activities and compliance with applicable codes, Project construction would not be expected to adversely impact firefighting and emergency services so as to necessitate a new or expanded fire station in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Moreover, consistent with *City of Hayward v. Trustees of*

California State University (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate. The Project would comply with applicable LAFD requirements, including implementation of Project's Construction Traffic Management Plan, and due to the temporary nature of the necessary construction activities, construction impacts on fire protection and emergency medical services would be less than significant and no mitigation measures are required.

Operations

Operational activities associated with the Project would increase the demand for fire protection and emergency medical services but not such that it would require the addition of a new fire station, or the expansion, consolidation, or relocation of an existing station in order to maintain service. As discussed under Item 5.14.a, the Project would result in an additional 622 residents. The estimated 622 persons increase would represent a nominal 0.01 percent increase in the City's existing population of 3,974,125 persons.[271] Because the Project is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQTA, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies.

The new buildings associated with the Project as well as any renovations associated with the former church building would also be subject to compliance with fire protection design standards, as necessary, per the CBC, CFD, the LAMC, and the LAFD, to ensure adequate fire protection. Key components of these regulatory requirements that would be implemented as part of the Project pursuant to LAFD review and guidance include the following:

- **Building Design:** Fire resistant doors and materials, as well as walkways, stairwell and elevator systems (including emergency and fire control elevators) that meet code requirements.
- **Fire Safety Features:** Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes, if not already installed, to facilitate a building evacuation if necessary; as well as a fire alarm system, building emergency communication system and smoke control system.
- **Emergency Safety Provisions:** Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The emergency plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident (e.g. floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts on the increased need for emergency medical services.
- **LAFD Access:** Access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access. Emergency vehicles and fire access

[271] Table 5-26.

to the Project Site and surrounding area would be provided along 6th Street and Shatto Place.

The City of Los Angeles requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the LAFD.

The Project Site is not located in an area of moderate or very high fire hazard.[272] In addition, the Project Site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required.

Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards. The ability of the water service provider to provide water supply to the Project Site is discussed in Item 5.19, *Utilities and Service Systems*. As discussed therein, adequate water supply would be available to serve the Project Site, including minimum fire flow requirements.

As mentioned above, up to three LAFD fire stations would provide fire protection and emergency medical services to the Project area and are dispatched based on availability and the nearest unit to a service call. The Project-related increase in traffic on surrounding roadways could potentially affect emergency response times in the area. A number of factors would serve to facilitate responses to emergency calls. Emergency response is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in lanes of opposing traffic, use of alternate routes, and multiple station response. The Project vicinity is well served by several nearby fire stations within close proximity to one-another and the Project Site. According to the General Plan Framework Element, the City distance standard for EMS services is 1.5 miles. As shown in Table 5-32, not one but three LAFD Stations are located near the Project Site within 1.5 miles, each satisfying the standard. Also, fire stations have access to multiple routes to attend emergency calls. Further, as identified in Item 5.17, *Transportation*, operational traffic impacts to the local roadway network would be less than significant.

There are a number of additional factors that influence emergency response times in addition to traffic, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, signals, and roadway characteristics. The LAFD has taken a number of steps to improve its related systems, processes and practices. Upgrades include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; development of a new computer aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident; and, use of traffic pre-emption systems. A traffic pre-emption system allows the normal operation of traffic lights to be preempted

[272] Zimas Website, http://zimas.lacity.org/, accessed May 2018 and the Los Angeles County Fire Hazard Severity Zones in SRA, Adopted by Cal Fire on November 7, 2007, http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf, accessed September 2018

by an emergency vehicle to improve response times by stopping conflicting traffic in advance, providing the emergency vehicle the right-of-way. Based on the ability of LAFD to respond to emergency situations, the number, proximity, and accessibility of fire stations in the Project vicinity and the multiple steps being taken by the LAFD to improve response times, Project impacts on fire protection, services, and response times are considered less than significant.

With incorporation of applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access, construction measures, and plot plan review), the Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the Project such that it would require construction of new fire facilities. Even if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the Project area is highly developed, and the site of a fire station or expansion of a fire station would likely be on an infill lot that would likely be less than an acre in size.

Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the Project would be required to mitigate.

Conclusion:

Based on the above, the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of fire facilities are considered less than significant and no mitigation measures are required.

b. Police protection?

Less Than Significant with Mitigation Incorporated. Significant impacts to police protection services would occur if the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police services. Police protection for the Project Site is provided by the Los Angeles Police Department (LAPD). The LAPD consists of approximately 10,035 sworn officers.[273] The LAPD operates 21 police stations within four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities. The Project Site is located in the West Bureau of the LAPD, which includes the Hollywood, Olympic, Pacific, West Los Angeles, and Wilshire Community Police Stations

[273] Los Angeles Police Department, COMPSTAT Citywide Profile, 4/22/18–5/19/18, http://assets.lapdonline.org/assets/pdf/cityprof.pdf Accessed May 2018.

and the West Traffic Division.[274] The Project would be under the jurisdiction of the Olympic Community Police Station, located at 1130 S. Vermont, Los Angeles, located approximately 1.1 miles to the south. The Olympic Station is staffed by approximately 235 sworn personnel and 14 civilian support staff.[275]

The Olympic Community Police Station service area is a culturally diverse community that includes approximately 200,000 people. The officer to resident ratio is 1 officer to 851 residents. Additionally, there are special service teams available within the LAPD to service the Olympic service area. The Olympic Station's emergency response system is directly linked to the LAPD Communications Division's Dispatch Centers. The LAPD Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, paramedic). The average response time to emergency calls for service in Olympic Area during 2017 was 3.3 minutes. The average response time for non-emergency calls for service in Olympic Area during 2017 was 24.4 minutes.[276]

Table 5-33, *Crime Statistics for the Olympic Area*, summarizes the crime statistics for the Olympic Area for 2018, 2017, and 2016. The total amount of crimes was 4,189 in 2018 (January to September), 4,432 in 2017, and 4,071 in 2016, with most of the crimes related to burglary from motor vehicles, personal/other thefts, and motor vehicle theft. As noted, while crimes statistics increased slightly in 2017, the average amount of crimes in 2018 decreased; remaining consistent with the 2016 levels.

TABLE 5-33
CRIME STATISTICS FOR THE OLYMPIC AREA

Crime	January to September 2018	2017	2016
Homicide	4	4	4
Rape	39	42	36
Robbery	420	511	422
Aggravated Assault	503	478	494
Burglary	444	468	490
Motor Vehicle Theft	549	630	513
Burglary From Motor Vehicle	1,271	1,317	1,183
Personal/Other Theft	959	982	929
Total	**4,189**	**4,432**	**4,071**

SOURCE: LAPD, September 2018

[274] The Los Angeles Police Department, Central Bureau, http://assets.lapdonline.org/assets/pdf/OWB_09.pdf, Accessed May 2018.

[275] The Los Angeles Police Department, Chief of Police, Michel R. Moore, Captain Darnell D. Davenport and Officer Christopher Gibson, Correspondence, September 19, 2018.

[276] Ibid.

Construction

During construction, equipment and building materials could be temporarily stored on-site, which could result in theft, graffiti, and vandalism. However, the Project Site is located in an area with high vehicular activity and visibility from Shatto Place and 6th Street. In addition, MM PS-1 states the construction site would be fenced along the perimeter to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

As discussed above, temporary lane closures may be required for right-of-way frontage improvements and utility construction. The curb lane on Shatto Place, which provides on-street parking, could be used intermittently throughout the construction period for equipment staging, concrete pumping, etc. However, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the Project Site would be maintained. Emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Further, as discussed above, a Construction Management Plan (MM TRAF-1) for the Project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. Given the visibility of the Project Site from adjacent roadways and surrounding properties, existing police presence in the City of Los Angeles, maintained emergency access, and construction fencing discussed in MM PS-1 the Project's construction activities are not expected to increase demand on existing police services to a meaningful extent. Therefore, the Project would have a less than significant temporary impact on police protection during construction with incorporation of MM PS-1.

Operations

Operational activities associated with the Project would increase demand for police protection services but not such that it would require the addition of a new police station, or the expansion, consolidation, or relocation of an existing station in order to maintain service. The Project would result in an additional 622 residents. The estimated 622 persons increase would represent a nominal 0.01 percent increase in the City's existing population of 3,974,125 persons[277] and a nominal 0.01 percent increase over the City's estimated employment of 1,848,725 jobs.[278] Because the Project is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQTA, the population growth generated by the Project is considered consistent with the City's and SCAG's planned growth policies. The Project would be designed in consideration of the City's "Design Out Crime" initiative to provide a Project design that incorporates strategies from Crime Prevention through Environmental Design (CPTED) (see MM PS-2). As discussed in Section 2, *Project Description*, the Project would incorporate security measures for the safety of residents, employees, and visitors to the Project Site. During operation of the Project, access to the parking structure would be controlled through gated entries, and the entry areas would be well illuminated. Site security would include controlled keycard access to residential areas, parking areas, secured entry and exit points to all buildings, security lighting within common areas and entryways, and closed circuit TV monitoring (CCTV). The mixed-use

[277] Based on SCAG data prepared for the 2016 RTP/SCS.

[278] Based on SCAG data prepared for the 2016 RTP/SCS.

tower would include a 24-hr concierge and security personnel would be present during the evenings that would provide patrols for the entire Project Site. As shown in Table 5-33, crime statistics for the Olympic Area has remained relatively stable over the past three-year period, and there has not been a high increase in crimes reported.

The LAPD apportions each Community Police Station into roughly eight to ten Basic Car areas, with one patrol car permanently assigned to each. Three teams of officers are assigned to patrol each neighborhood on a 24-hour basis (three eight-hour shifts). These officers provide neighborhood patrol to prevent crime and answering radio calls for service. Additional patrol units may be assigned during periods of increased workload.[279] Response times are a function of patrol car location and calls occurring at a particular time. As identified in Item 5.17, *Transportation*, operational traffic impacts would be less than significant. Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternative routes, and multiple station response. Emergency access to the Project Site and surrounding uses would be maintained at all times and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Thus, Project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the Project Site. Finally, the Project would provide adequate access for emergency vehicles to the Project Site subject to the approval of the LAPD. Prior to the occupancy of the Project, the Applicant would provide the LAPD with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses (see MM PS-3). Accordingly, impacts associated with emergency response times and emergency access are considered less than significant with incorporation of mitigation.

Overall, given the incremental change to the population served by the Olympic Community Police station created by the Project, the relatively stable crime statistics in the Olympic Area, the Project's planned on-site security measures, and that LAPD has no known or purposed plans to expand their police facilities serving the Project area,[280] the Project is not expected to result in a substantial increase in demand for additional police protection services that would exceed the capability of the LAPD to serve the Project such that it would require construction of new police facilities.

Even if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted by LAPD, and was foreseeable, the Project area is highly developed, and the site of a police station or expansion of a police station would likely be on an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City's general fund. Accordingly, the Project

[279] LAPD, Official Site of the Los Angeles Police Department, http://www.lapdonline.org/search_results/content_basic_view/6528. Accessed, October 22, 2018.

[280] http://clkrep.lacity.org/onlinedocs/2009/09-0698_rpt_cao_3-27-09.pdf. Accessed October 24, 2018.

would not create the need for additional police protection services as part of an unplanned police station.

As described in Section 3, SCEA Criteria and Transit Priority Project Consistency Analysis, Table 3-3, *Project Consistency with the SCAG 2016-2040 RTP/SCS Mitigation Measures*, the Project has included all relevant public service mitigation measures contained in the 2016 RTP/SCS PEIR. In addition to these applicable mitigation measures (such as SCAG 2016-2040 RTP/SCS Mitigation Measure MM-PS-2(b)) to further minimize potential impacts to police services, the Project would include Project-specific mitigation measures listed below.

Mitigation Measures

MM PS-1: A construction fence shall be constructed around the Project Site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

MM PS-2: The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

MM PS-3: Prior to the occupancy of the Project, the Applicant shall provide the Olympic Area Commanding Officer with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

Conclusion:

Based on the analysis above, impacts are considered less than significant with the incorporation of mitigation measures MM PS-1, MM PS-2, and MM PS-3.

c. Schools?

Less Than Significant Impact. Significant impacts to school services would occur if the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for school services. The Project would be served by the Los Angeles Unified School District (LAUSD). The LAUSD is the largest (in terms of number of students) public school system in California and the second-largest in the U.S. The LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles, all or portions of 26 other cities, as well as several unincorporated areas of Los Angeles County. Approximately 4.8 million persons live within the District's boundaries. The LAUSD provides kindergarten through high school (K–12) education to a total of 571,855

students with a total enrollment of 694,096 students when including adult and early childhood education students.[281]

LAUSD is currently divided into six Local Districts (Northeast, Northwest, East, West, Central and South), with the Project Site being located in the Local District Central.[282] The Project Site is located within the school of choice attendance area for the Robert F. Kennedy Community School; a large school complex composed of six pilot schools sharing the site of the former 24-acre site of the Ambassador Hotel. A pilot school is defined by the LAUSD as an autonomous small school with no more than 450 students from grades 9-12.[283] Schools with the Robert F. Kennedy Community School that are a school of choice for the Project Site include the New Open World Academy (Kindergarten to Grade 12); the Ambassador School of Global Leadership (Grades 6 to 12); the Ambassador School of Global Education (Kindergarten to Grade 5); UCLA Community School (Kindergarten to Grade 12); the School for the Visual Arts and Humanities (Grades 9 to 12); and the Los Angeles High School of the Arts (Grades 9 to 12).[284,285]

According to the LAUSD, none of the schools serving the Project Site is over capacity. The capacity for all six schools serving the Project Site is 4,893 students, with 3,997 students currently enrolled in the 2017-2018 school year.[286]

Construction

Construction of the Project would require construction employees that would be hired from a mobile regional construction work force that moves from project to project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and short durations of work at a particular site, and a large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate residences within this region or move from other regions as a result of their work on the Project. Therefore, Project construction would not generate a significant amount of new students needing to attend local schools that would require the addition of a new school facility or expanding.

Operation

Project operation would incrementally increase demand for school services but not such that it would require the addition of a new school facility, or the expansion, consolidation, or relocation of an existing facility in order to maintain service. The estimated 622 persons increase would represent a nominal 0.01 percent increase in the City's existing population of 3,974,125

[281] LAUSD, Fingertip Facts 2018-2019 LAUSD, Fingertip Facts https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=47248&dataid=68431&FileName=Fingertip%20Facts2018-19_EnglishFinalDS.pdf Accessed October 15, 2018.

[282] Los Angeles Unified School District, Local Districts Map. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/33/Central.pdf, Accessed October 15, 2018.

[283] https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=27850 &dataid=43983&FileName=Master%20RFK%20ZOC%20Brochure%202018-19%20.pdf Accessed October 15, 2018.

[284] https://rfkschools-lausd-ca.schoolloop.com/cms/page_view?d=x&piid=&vpid=1311083918838. Accessed October 15, 2018.

[285] LAUSD Correspondence from Rena Perez, Director LAUSD. September 12, 2018.

[286] LAUSD Correspondence from Rena Perez, Director LAUSD. September 12, 2018.

persons.[287] The Project would result in a net increase of 20 employees on the Project Site. If new employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some new employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be negligible change in student population in the nearby schools.

Using LAUSD student generation rates, the Project is estimated to generate 42 elementary school students, 11 middle school students, and eight high school students for a total of 61students.[288] This number is conservative in that it assumes that none of the future Project residents with families would already have students attending the affected schools. Furthermore, it should be noted that the Project's large number of one-bedroom units would generate few students and that it is possible that a portion of the Project's school-age children would likely attend private schools or charter schools, thus reducing attendance at LAUSD schools. As noted above, none of the schools serving the Project Site are overcrowded, and there is capacity for all six schools serving the Project Site. As noted earlier, project impacts related to schools would be addressed through payment of required SB 50 development fees pursuant to Sections 65995 of the California Government Code. In accordance with SB 50, the payment of these fees are deemed to provide full and complete mitigation under CEQA for impacts to school facilities.

Conclusion:

With payment of SB 50 school fees, operational impacts to school services and facilities would be less than significant and no mitigation measures are required.

d. Parks?

Less Than Significant Impact. Significant impacts to park services would occur if the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for park services. The Los Angeles Department of Recreation and Parks (LADRP) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City. These facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs and programs for senior citizens. The LADRP also supervises construction of new facilities and improvements to existing ones. Currently, the LADRP maintains over 16,000 acres of parkland within approximately 444 regional, community and neighborhood parks, dozens of pocket and specialty parks. LADRP maintains and operates hundreds of athletic fields, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness

[287] Based on SCAG data prepared for the 2016 RTP/SCS.

[288] Student generation rates for residential uses are taken from the Draft School Facilities Needs Analysis 2012, LAUSD, September 2012. Based on the rate for multifamily residential uses: Elementary = 0.1649; Middle School = 0.045; High School = 0.0303. Student generation rates for retail and restaurant uses are taken from the 2010 Commercial/Industrial Development School Fee Justification Study, LAUSD, September 27, 2010 – the most recent data available for non-residential uses. For each 1,000 square feet of non-residential space – Elementary = 0.0178; Middle School = 0.0089; High School = 0.0111. Total number of students has been rounded up, in order to provide whole student number counts.

areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, nine dog parks, and 187 summer youth camps.[289]

One measure of park service is the ratio parkland per 1,000 residents. The City uses such a ratio for monitoring park service levels and establishing goals for provision of parkland.[290] The City goals in the Public Recreation Plan (PRP) are to have 1 acre each of neighborhood and community parkland per 1,000 persons in the short/intermediate term and 2 acres each of neighborhood and community parkland per 1,000 persons in the long-term.[291] The current City-wide ratio is 0.76 acres of neighborhood and community parkland per 1,000 residents. The Wilshire Community Plan area has a ratio of 0.23 acres of neighborhood and community parkland per 1,000 residents.[292]

The Project area is served by several public parks and recreational facilities. The following LADRP neighborhood parks and recreational facilities are located within a two-mile radius of the Project Site: Alvarado Terrace Park (1342 South Alvarado Terrace), Cahuenga Elementary Community School Park (220 South Hobart Boulevard), Country Club Park Heritage Plaza (1015 South Wilton Place), Harvard Elementary Community Park School (330 North Harvard Boulevard), Hope and Peach Park (843 Bonnie Brae Street), Leo Politi Elementary Community School Park (2481 West 11th Street), Madison West Park (464 North Madison Avenue), Pico Union Park (1827 South Hoover Street), Rockwood Community Park (1571 Rockwood Street), and Unidad park (1644-48 Beverly Boulevard).

Community parks and recreational facilities within 2 miles of the Project Site include, Shatto Recreation Center (3191 West 4th Street), which is located one block to the north. Other community parks and recreational facilities located within 2 miles of the Project Site include: Bellevue Recreation Center (826 Lucille Street), Echo Park (751 Echo Park Boulevard), Echo Park Deep Pool (1419 Colton Street), Lafayette Park (2830 West 6th Street), Lake Street Community Center (227 North Lake Street), Lemon Grove Recreation Center (4959 Lemon Grove Avenue), MacArthur Park (2230 West 6th Street), Miguel Contreras Learning Center Pool (322 South Lucas Avenue), Normandie Recreation Center (1550 South Normandie Avenue), Parkview Photo Center (2332 West 4th Street), Seoul International Park (3250 San Marino Road), Toberman Recreation Center (1725 Toberman Street), and Vista Hermosa Soccer Field (1301 West 1st Street).

Located within a two-mile radius of the Project Site is the Francis Avenue Community Garden (2909 Francis Avenue), the Laurel and Hardy Park (3022 Del Monte Drive), Robert F Kennedy

[289] City of Los Angeles, Los Angeles Department of Recreation and Parks website "Who We Are" http://www.laparks.org/department/who-we-are. Accessed October 21, 2018.

[290] City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted October 9, 1980.

[291] City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted October 9, 1980.

[292] LARDP Correspondence, Michael A. Shull, General Manager, September 18, 2018.

Inspiration Park (3400 Wilshire Boulevard). These three park are maintained by the County of Los Angeles.[293]

The LADRP is currently in the process of renovating the playground at the Bellevue Recreation Center at 826 Lucile Avenue, replacing the skate park at the Lake Street Community Center at 227 North Lake Street, and refurbishing the playground at the Seoul International Park.[294]

As currently designed, the Project would provide 21,450 sf of credited open space, and would be compliant with open space requirements. Specifically credited open space and amenities provided as part of the Project would include open space and a dog run area on the ground floor, amenity decks on levels two and 30, interior common open space and 10,700 sf of open space as private balconies.

The Project would also provide an additional 16,200 sf of uncredited open space which would include a ground floor plaza, amenities on level 2 and level of 30 of the new mixed-use building and a rooftop amenity deck and pool.

The ratio of on-site park land for the 21,450 sf of credited space (approximately 0.49 acres) and 622 people would be 0.8 acres/1,000 people. The ratio based on 64,225 sf of total open space (1.47 acres) would be approximately 2.36 acres/1,000 people.

The Project's estimated population increase of 622 persons would result in a demand for approximately 1.2 acres of parkland to meet the City's neighborhood and community parkland standards for the short/intermediate term and 2.5 acres to meet the City's neighborhood and community parkland long-term standards. However, these standards are goals for the City; and the City's requirements for park space are established in the LAMC.

LAMC Section 12.21-G requires that open space be provided with the development of residential uses. **Table 5-34**, *Project Open Space Requirements*, illustrates the approximated amount of open space that would be required according to unit types. As shown in Table 5-34, the Project would be required to provide 28,600 sf of open space which may include recreational facilities and amenities for the Project's 256 units (152 units with less than 3 habitable rooms, 96 units with 3 habitable rooms, and 8 with more than three habitable rooms). This amount is further reduced to 21,450 sf through the requested TOC Additional Incentive for a 25 percent reduction in required open space. The project would provide 21,450 sf of credited open space, of which, 10,700 sf would be private balconies.

[293] https://locator.lacounty.gov/. Accessed October 22, 2018.

[294] City of Los Angeles Department of Recreation and Parks, Michael A. Shull, General Manager. Correspondence. September 18, 2018.

TABLE 5-34
PROJECT OPEN SPACE REQUIREMENTS

Proposed Residential Units	Number of Habitable Rooms	Quantity (units)	Factor (sf/unit)[a]	Open Space Requirement (sf)
Studio/1-Bedroom	<3	152	100	15,200
2-Bedroom	3	96	125	12,000
3-Bedroom	>3	8	175	1,400
Total				**28,600**
Open Space Required After up to 25% Reduction[b]				**21,450 sf**

[a] Factors based on LAMC Section 12.21.G
[b] TOC Additional Incentives for Tier 4 (25%)

SOURCE: ESA October 2018.

The Project would also provide an additional 42,775 sf of uncredited exterior and interior private open space which would include a ground floor plaza, private terraces, gym/fitness room, community room, and swimming pool. As such, the Project would be consistent with the requirements of LAMC, and provide a variety of amenities for the Project residents.

Because of the accessibility of the Project's open space and recreation features, and the fact that the facilities would be designed to meet the focused needs of the Project residents, it is expected that the majority of the Project's recreational demand would take place within the Project Site. Some residual demand would occur for the use of facilities not provided within the Project. The demand for such space would be reduced by the provision of on-site space and the moderate size of the Project population. Because the majority of the Project includes smaller unit sizes, this may reduce the incidence of larger families and the demand for open space facilities further.

Residual off-site park use would likely be dispersed to parks serving the Project area that would be easily accessible and that have unique features that would be of interest to different residents. It is, thus, anticipated that impacts at any single park location would be minimum and the Project contribution to park use would not cause substantial degradation of existing facilities or require a new public park.

LAMC Section 12.33, which implements the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. As per Section 12.33, Applicants must meet with the Department of Recreation and Parks and Department of City Planning staff and determine appropriate dedication of land and/or payment of in lieu fees.[295]

The Project proposes to include 21,450 sf (0.49 acres) of recreational/amenity spaces, pursuant to LAMC Sec 12.21 and would seek recreational credit against the 12.33 in lieu fees.

[295] City of Los Angeles Board of Recreation and Park Commissioners, Board Report. August 8, 2018.

In addition, pursuant to LAMC Section 21.10.3(a)(1), Dwelling Unit Construction Tax, the City imposes a tax $200 per dwelling unit on all construction of new dwelling units and modification of existing dwelling units. These taxes are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. If a developer has already paid Quimby fees, as described under Section 12.33 or has dedicated in lieu parkland or recreational facilities, the dwelling unit tax required may be reduced accordingly.

The finalized Project design would be reviewed by the Department of City Planning to determine whether proposed facilities meet the applicable criteria for consideration or additional park land dedication or fees must be paid. Payment of such fees, if required, would provide a means for the Project to support the provision of park lands in a way that would avoid potential deterioration of parks serving the Project vicinity.

Because the Project's demand for park space would be limited, there are park facilities, including a major regional facility available to serve the Project Site, and the Project per Section 12.33 would provide sufficient facilities or in-lieu fees to avoid adverse impacts to the City's Open Space facilities, the Project demand would not require new, consolidated or expanded facilities and would further avoid deterioration of parks that might be visited by Project residents.

Conclusion:

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

e. Other governmental services?

Less Than Significant Impact. Significant impacts to library services would occur if the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. The City of Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. The LAPL system provides library facilities and services to the Project Site and the City of Los Angeles. The LAPL consists of the Central Library, eight regional branches, and 64 community branches. The LAPL has a collection size of 7.1 million with 2.1 million library cardholders. All branch libraries provide free access to computer workstations that are connected to the LAPL's information network. In addition to providing internet access, these workstations enable the public to search LAPL's electronic resources including the online catalog, subscription databases, word processing, language learning, literacy, and a large collection of historic documents and photographs.[296] LAPL has also expanded its digital access to LAPL members. Specifically, LAPL members have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications.[297] In addition, specially designed websites are provided for children, teens, and Spanish-speaking patrons. The LAPL is a member of the Southern California Library Cooperative (SCLC). SCLC is an association of 39 independent

[296] LAPL, Aurial Granger, Management Assistant, Correspondence October 10, 2018.

[297] https://www.lapl.org/collections-resources/e-media. Accessed October 22, 2018.

city and special district public libraries in the greater Los Angeles area that shares resources to improve library service to the residents of all participating jurisdictions.

The Project Site is served by the Cahuenga Branch Library, the Echo Park Branch Library, the Edendale Branch Library, the Felipe de Neve Branch Library, the Pico Union Branch Library, Pio Pico-Koreatown Branch Library, and the Wilshire Branch Library. **Table 5-35**, *Libraries Located in within 2 Miles of the Project Site*, provides information regarding these libraries, including their distance/direction from the Project Site, size, and population served.

TABLE 5-35
LIBRARY FACILITIES LOCATED WITHIN 2 MILES OF THE PROJECT SITE

Library	Distance/ Direction from Project Site[a]	Size in Square Feet	Population Served
Cahuenga Branch Library 4591 Santa Monica Boulevard	1.8 miles to the north	10,942	90,947
Echo Park Branch Library 1410 West Temple Street	1.9 miles to the east	17,543	52,842
Edendale Branch Library 2011 West Sunset Boulevard	1.8 miles to the northeast	12,500	23,254
Felipe de Neve Branch Library 2820 West 6th Street	0.35 miles to the west	9,273	110,861
Pico Union Branch Library 1030 South Alvarado Street	1.1 miles to the south	12,500	41,457
Pio Pico-Koreatown Branch Library 694 South Oxford Street	1.03 miles to the west	20,000	123,611
Wilshire Branch Library 149 North Saint Andrews Place	1.44 miles to then northwest	6,258	109,529

[a] Approximate distance/direction from Project Site in miles is a straight line distance, not a drive distance.

SOURCE: LAPL, Aurial Granger, Management Assistant, Correspondence October 10, 2018.

The 2007 LAPL Branch Facilities Plan (Facilities Plan) guides the construction of branch libraries and specifies standards for the size and features of branch facilities based on the population served in each community. The Facilities Plan also outlines the required facilities expansion needs of the libraries within the City. Under the Facilities Plan, the service population for a branch library is determined by the size of the facility as set forth in **Table 5-36**, *LAPL Branch Facilities Plan – Library Building Size Standards*. The Facilities Plan has been implemented with two bond measures: the 1989 Bond Program and the 1998 Bond Program.[298]

[298] Los Angeles Public Library, Strategic Plan, 2007 – 2010, Building on Success; Appendices, VI and VII. http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf. Accessed October 22, 2018.

TABLE 5-36
LAPL BRANCH FACILITIES PLAN – LIBRARY BUILDING SIZE STANDARDS

Library Type	Population Served	Size of Facility (sf)
Local Branch	< 45,000	12,500
Local Branch	> 45,000	14,500
Regional Branch	Unspecified	≤ 20,000
Central Library	System-Wide	Unspecified
Level at which new Branch Library recommended	90,000	12,500–14,500

SOURCE: Building on Success: Los Angeles Public Library Strategic Plan, 2007–2010, Branch Facilities Plan. http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf.

In 1989, City of Los Angeles voters approved Proposition 1, a $53.4 million Branch Library Facilities Bond also known as the 1989 Library Bond Issue. Under Proposition 1, the Facilities Plan proposed to obtain new sites for building, renovating, and expanding libraries that were unable to serve the community sufficiently and/or were damaged by the Whittier earthquake. LAPL also obtained additional funds from the Community Development Block Grant Award of federal funds from the California State Library Proposition 85, as well as from Friends of the Library groups, for a total branch construction program of $108 million. Under the 1989 Bond Program, 29 libraries were built.[299]

On November 3, 1998, Los Angeles voters approved Proposition DD. Proposition DD, also known as the 1998 Library Facilities Bond, authorized $178.3 million in bonds for funding the construction, renovation, improvement, or expansion of 32 new branch libraries. As a result of effective project management, four additional projects were added to the scope of the overall facilities program. Of the 36 total projects, 18 existing library facilities were replaced with 18 new library facilities on the existing City-owned sites, nine libraries were constructed on newly acquired sites, five new libraries were constructed on acquired sites in communities that previously did not have library services, and with the four additional projects, existing libraries were renovated and expanded. The entire original Facilities Plan has been completed.

In March 2011, the City of Los Angeles approved Measure L to restore LAPL's service hours back to the levels available prior to the 2010 economic downtown. Through Measure L, LAPL would also be able to expand its services, collections and technology. The LAPL Strategic Plan 2015-2020 is a 5-year plan to detail expanded programs and services, referred to as Key Activities within the Plan, offered by LAPL. With the shift in technology from books to computers, the demand for library facilities is changing. As stated above, members of LAPL have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications made available to library patrons. The availability of such resources reduces the demand for physical library space. Recognizing these facts, the Los Angeles Public Library Strategic Plan 2015-2020 places emphasis on the employment of new

[299] Ibid.

technology for meeting future needs and includes objectives for increasing it digital collections, e-mail circulation and use of mobile apps. This has the result of allowing the LAPL to meet increased population demand aside from the provision of new physical facilities.

The Project's construction workers would come from an existing labor pool whose workers move between construction projects on short-term bases without requiring relocation. Workers traveling to work may stop at a library that is outside of their residential neighborhood. Such library stops would be incidental and typical of workers throughout the region. Such stops would increase library use at one location while reducing it at another. Such variations would occur on short-term bases. Therefore, there would be no notable increase in library usage at the libraries serving the Project Site, and no need for the construction of library facilities to accommodate construction population. The nearest library to the Project Site is the Felipe de Neve Branch Library, located 0.35 miles from the Project Site. There are no LAPL plans to add libraries in the area.[300] Therefore, construction activities would not adversely affect the operations of nearby libraries.

The Project's would result in a net increase in residential population of approximately 622 residents. The seven nearest libraries serving the Project Site are identified in Table 5-35. The closest library is the Felipe de Neve Branch Library located 0.35 from Project Site and thus would be expected to be the primary facility used by Project residents. The Project Site also has close proximity to the Pio Pico-Koreatown Branch Library located 1.03 miles from the Project Site, the Pico Union Branch Library located 1.1 miles from the Project Site, the Wilshire Branch Library located 1.44 miles from the Project Site, the Edendale Branch Library located 1.8 miles from the Project Site, the Cahuenga Branch Library located 1.8 miles from the Project Site, and the Echo Park Branch Library located 1.9 miles from the Project Site. As identified in Table 5-35, while the closest Library to the Project Site, the Felipe de Neve Branch Library, is smaller than the facility size criteria, the second closest library to the Project Site, the Pio Pico-Koreatown Library, meets the facility size criteria for its service population.

In addition, the Project's residential units would be equipped to receive individual internet service, which would offer residents the opportunity to access the LAPL's online database system that includes podcasts, audiobooks, media publications, and instructional content. The availability of such resources reduces the demand for physical library space.

In addition, the Project would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents. The above fees and mechanisms would offset any incremental need for funding of capital improvements to maintain adequate library facilities and service, resulting from the Project. Furthermore, there are no LAPL plans to add libraries in the area[301] and the Project would not create a demand for a new library.

[300] LAPL, Aurial Granger, Management Assistant, Correspondence October 10, 2018.
[301] LAPL, Aurial Granger, Management Assistant, Correspondence October 10, 2018.

Conclusion:

Impacts regarding library services would be less than significant and no mitigation measures are required.

Cumulative Impacts: Public Services

Fire Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional fire protection and emergency medical services from the LAFD. Although there would be cumulative demand on LAFD services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site specific design and safety requirements, similar to the Project. All related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety.

The protection of public safety is the first responsibility of local government, and local officials have an obligation to give priority to the provision of adequate public safety services which are typically financed through the City general funds. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. The Project, as well as the related projects, would also generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of fire services, as deemed appropriate by the City.

Further, project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD are expected to help support adequate response times. According to the LAFD, at present, there are no immediate plans to increase Fire Department staffing or resources in the areas that would serve the Project Site[302] and the LAFD has reviewed the Project's tract map application.[303] Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Even in consideration of the related projects, if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the Wilshire Community Plan Area is highly developed, and the site of a fire station would likely be an infill lot that would likely be less than an acre in size.

Conclusion:

Based on the above considerations, the Project would not result in a cumulatively considerable contribution to cumulative impacts associated with the construction of new fire facilities.

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[302] City of Los Angeles Bureau of Engineering, Fire Bond Projects 2016 http://eng2.lacity.org/projects/fire_bond/documents/current_monthly_report.pdf.

[303] City of Los Angeles Fire Department, Fire Chief Ralph M. Terrazas. Correspondence August 3, 2018.

Police Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional police protection services from the LAPD. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the LAPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. Even in consideration of the related projects, if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted by LAPD, and was foreseeable, the Wilshire Community Plan Area is highly developed, and the site of a police station would likely be an infill lot that would likely be less than an acre in size. In addition, like the Project, the related projects would also be expected to provide on-site security, personnel and/or design features for their residents and patrons. Each related project would be subject to the City of Los Angeles' routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented.

Further, the protection of public safety is the first responsibility to local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City 's General Funds. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the Project is required to mitigate. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

Conclusion:

Based on the above considerations, the Project would not make a cumulatively considerable contribution to cumulative impacts associated with the construction of new police facilities.

Schools

None of the schools serving the Project Site are overcrowded, and there is capacity for all six schools serving the Project Site. Pursuant to Government Code Section 65995, the payment of developer fees under the provisions of SB 50 addresses the impacts of new development on school facilities serving that development. Accordingly, impacts on public schools from related projects would be mitigated to less than significant with payment of developer fees. Furthermore, as the Project would also pay school impact fees.

Conclusion:

The Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Parks

Of the 118 development projects on the related projects list, include residential components. The 95 related projects with residential components include a total of 15,822 housing units with a corresponding increase of 38,931 persons. When combined with the Project's 256 net new units and increase of 622 in population, the total number of housing units is 16,078 units and the total population is 39,553.

As with the Project, new related residential projects are anticipated to provide on-site open space and recreational amenities to meet the needs of projected residents. In addition, LAMC Section 12.33, which implements the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. In addition to the provision of on-site recreational amenities for related residential related projects, the implementation of required parks and recreational fees under the LAMC would allow for land purchase and expansion of existing facilities. As such, related projects are not anticipated to result in substantial physical deterioration or accelerated deterioration of recreational and parks facilities.

As described above, the Project would include approximately 64,225 sf of exterior and interior private open space and common open space. These open space areas include a ground floor and open space, private terraces, gym/fitness room, community room, and amenity deck with a pool and landscaping. Of that 64,225 sf, 21,450 sf would be credited open space towards park in-lieu requirements.

Although it is anticipated that the Project would comply with LAMC Section 12.33, the finalized Project design would be reviewed by the Department of City Planning to determine whether proposed facilities meet the applicable criteria for consideration or additional park land dedication or fees must be paid. With fulfillment of the required provisions of the LAMC, which require dedication of land or payment of in-lieu fees, if necessary, impacts would be less than significant.

Conclusion:

The Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Other Governmental Services

With respect to libraries, each related project would also generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhanced library services in the Community Plan Area, as deemed appropriate. While the related projects would not require the construction of new library facilities, these revenues to the City's General Fund would help offset the increase in demand for library services and support the provision of services within the existing facilities.

Conclusion:

Based on the above considerations, the Project would not make a cumulatively considerable contribution to cumulative impacts associated with the construction of new library facilities.

5.16 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?

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact (a–b). As discussed under Item 5.15.d, operational activities associated with the Project would increase demand for park services. However, the Project would provide 64,225 sf of open space and amenities that would be tailored to meet the needs of the anticipated residential population. The Project would provide required open space that exceeds the City's open space requirements. The assessment of impacts associated with the construction of any recreational facilities is inclusive of the assessment of impacts associated with the Project in its entirety. As such, the demand or use of nearby park facilities would be reduced at times by the Project. Nonetheless, to offset the Project's demand on park facilities and services, the Project Applicant would be responsible for meeting the parkland dedication or fee requirements pursuant to the Quimby Act and Section applicable LAMC requirements, as necessary. Therefore, with the proposed open space features and payment of applicable fees, the Project would not substantially deteriorate, or accelerate the deterioration of recreational facilities or resources.

Conclusion:

Impacts would be less than significant in and no mitigation is required.

Cumulative Impacts: Recreation

Refer to discussion of cumulative impacts related to parks and recreational facilities under Section 5.15, above.

5.17 Transportation

Would the project:

a. Conflict with a program plan, ordinance or policy addressing circulation system, including transit, roadway, bicycle and pedestrian facilities?[304]

Less Than Significant with Mitigation Incorporated. The following discussion is based on the analysis provided in the *Transportation Impact Study for the 550 South Shatto Place Project, October 2018* (Transportation Study), prepared by Gibson Transportation Consulting, Inc. contained in Appendix J. The Transportation Study as reviewed and approved by the Los Angeles

[304] While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles travelled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on LADOT's adopted methodology under its Transportation Impact Study Guidelines, which requires use of LOS to evaluate traffic impacts of a Project.

Department of Transportation (LADOT) as discussed in the LADOT approval letter dated October 18, 2018.

The Project proposes a mixed-use development consisting of up to 256 apartment units, including 29 affordable housing units, and approximately 2,507 sf of ground floor office uses and up to approximately 12,800 sf of restaurant uses. The existing school uses on the Project Site would be removed with the development of the Project. The Project would provide approximately 329 vehicular parking spaces in an on-site parking structure, including one at-grade level and four below-grade levels. The Project would also provide approximately 158 bicycle parking spaces, including 141 long-term and 17 short-term spaces. Vehicular access would be provided via one full-access driveway on Shatto Place. The Project would increase the development intensity on the Project Site compared to existing conditions. Thus, the Project would result in an increase in daily and peak-hour traffic within the transportation study area.

Construction

Construction activity would add traffic to the local and regional transportation systems through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site.

Based on projections, the estimated number of daily trips associated with the construction workers is approximately 556 (278 inbound and 278 outbound trips). In addition, it is anticipated that a maximum of 152 delivery trucks would arrive and depart from the Project Site during the building phase of construction of the Project. Thus, up to 304 daily truck trips (152 inbound, 152 outbound) are forecasted to occur during construction.[305] Because construction trucks (such as earth-hauling trucks and cement trucks) are larger and slower than the passenger vehicles that make up the majority of the vehicles on the roads, they have an effect on traffic that is greater than a passenger vehicle's effect. Therefore, the Transportation Research Circular No. 212 defines passenger car equivalency (PCE) for a vehicle as the number of through moving passenger cars to which it is equivalent based on the vehicle's headway and delay-creating effects Assuming a PCE factor of 2.0, the 304 daily truck trips would be equivalent to 608 daily PCE trips.[306]

In general, the hours of construction typically require workers to be on-site before the weekday morning commuter peak period and allow them to leave before or after the afternoon commuter peak period. Therefore, most, if not all, construction worker trips would occur outside of the typical weekday commuter peak periods.

As part of the Project, a detailed Construction Management Plan, included as MM TRAF-1, would be provided.[307] The Construction Management Plan would include street closure information, a detour plan, haul routes, and a staging plan, and would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan would be based on

[305] Transportation Impact Traffic Study for the 550 South Shatto Place Project, October 2018.
[306] Transportation Impact Traffic Study for the 550 South Shatto Place Project, October 2018.
[307] Transportation Impact Traffic Study for the 550 South Shatto Place Project, October 2018.

the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site.

The trips generated to the Project Site during construction activities are anticipated to be less than the trips generated by the Project. Therefore, it is expected that the traffic impacts associated with construction activities would also be less than the traffic impacts associated with the operations of the Project. Thus, construction activities are expected to have a less-than-significant impact on street and intersection service levels.

Construction activities are expected to be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site. The curb lane on Shatto Place, which provides on-street parking, could be used intermittently throughout the construction period for equipment staging, concrete pumping, etc. Temporary traffic controls would be provided to direct traffic around any closures as required in the Construction Management Plan. Travel lanes would be maintained in each direction on Shatto Place throughout the construction period, and emergency access would not be impeded.

The use of the public ROW along Shatto Place and 6th Street may require temporary rerouting of pedestrian traffic as the sidewalks fronting the Project Site would be closed. The Construction Management Plan would include safety precautions and procedures for pedestrians and bicyclists including the installation of directional signage and protection barriers.

There is no bus stop adjacent to the Project Site that would require any temporary relocation. On-street parking is allowed along Shatto Place, so construction fences could result in the temporary loss of approximately 200 linear feet of curb parking on the east side of Shatto Place.

Project construction is not expected to create hazards for drivers, bicyclists, or pedestrians as long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, worker travel times, staging, etc.) would be incorporated into the Construction Management Plan (MM TRAF-1).. The Project would implement the Construction Management Plan described below to further reduce impacts. Further, additional mitigation measures are provided below to reduce potential construction related traffic and safety impacts that may affect the Young Oak Kim Academy.

Mitigation Measure

MM TRAF-1: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate:

- Requiring workers and construction trucks to generally travel outside of the peak hours;
- Prohibition of construction worker parking on nearby residential streets;
- Temporary traffic control during all construction activities encroaching on public rights-of-way to improve traffic flow and safety on public roadways;

- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate;
- Scheduling of construction-related deliveries so as to generally occur outside the commuter peak hours; and
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.

Public Services (Construction Activity near Schools)

MM TRAF-2: There shall be no staging or parking of construction vehicles, including vehicles to transport workers on any of the streets adjacent to the school.

Public Services (Schools Affected by Haul Route)

MM TRAF-3: LADBS shall assign specific haul route hours of operation based upon Young Oak Kim Academy's hours of operation.

MM TRAF-4: Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

MM TRAF-5: The 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.

Conclusion:

With incorporation of mitigation measures MM TRAF-1 through MM TRAF-5, construction impacts would be less than significant.

Operation

Once construction is complete, the Project's residents, employees, and visitors would generate daily vehicle and transit trips that could affect the existing capacity of the street system.

A total of 15 signalized intersections were selected for the Project traffic analysis in consultation with the Los Angeles Department of Transportation. These intersections were chosen as these intersections have the greatest potential to experience significant transportation impacts due to the Project as defined by the City, including intersections that are:

1. Immediately adjacent or in close proximity to the Project Site;
2. In the vicinity of the Project Site that are documented to have current or projected future adverse operational issues; and
3. In the vicinity of the Project Site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

Level of service (LOS) is a qualitative measure used to describe traffic flow conditions, which range from excellent, nearly free-flow traffic at LOS A to restricted movements and tremendous delays at LOS F. The definitions of the LOS levels and their related V/C ratio for intersections are shown in **Table 5-37**, *Level of Service Definitions*.

TABLE 5-37
LEVEL OF SERVICE DEFINITIONS

Level of Service	Definition	Signalized V/C Ratio
A	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.	0.000–0.600
B	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.	0.601–0.700
C	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.	0.701–0.800
D	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.	0.801–0.900
E	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.	0.901–1.000
F	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.	> 1.000

SOURCE: *Transportation Research Circular No. 212, Interim Materials on Highway Capacity* (Transportation Research Board, 1980).

The methodology for the signalized intersection analysis calculated the volume-to-capacity (V/C) ratio, which is used to determine the intersection LOS. LADOT guidelines indicate that a Project is considered to have a significant traffic impact on a signalized intersection if the increase in the V/C ratio attributable to the Project exceeds a specific threshold depending on the final intersection LOS. As shown in **Table 5-38**, *Signalized Intersection Analysis Methodology*,

LADOT has developed a sliding scale methodology in which the minimum allowable increase in the V/C ratio attributable to a project decreases as the V/C ratio of the intersection increases.

TABLE 5-38
SIGNALIZED INTERSECTION ANALYSIS METHODOLOGY

Intersection Conditions with Project Traffic		
LOS	**V/C**	**Significant Impact Threshold for Project-Related Increase in V/C Ratio**
C	0.701–0.800	Equal to or greater than 0.04
D	0.801–0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01

SOURCE: City of Los Angeles.

The signalized 15 intersections and respective LOS are summarized in **Table 5-39**, *Levels of Service for Existing Conditions: Signalized Intersections*. As the Project met the screening thresholds identified in the First Amendment to the Agreement between LADOT and Caltrans District 7 on Freeway Impact Analysis Procedures (State of California and City of Los Angeles, December 15, 2015), a detailed analysis of Caltrans facilities was also conducted and is included in the Transportation Study.

TABLE 5-39
LEVEL OF SERVICE FOR EXISTING CONDITIONS: SIGNALIZED INTERSECTIONS

			Existing Conditions	
No.	**Signalized Intersection**	**Peak Hour**	**V/C**	**LOS**
1.	Vermont & 3rd Street	AM	0.802	D
		PM	0.770	C
2.	Virgil Avenue & 3rd Street	AM	0.751	C
		PM	0.753	C
3.	Vermont Avenue & 4th Street	AM	0.594	A
		PM	0.586	A
4.	Shatto Place & 4th Street	AM	0.441	A
		PM	0.399	A
5.	Virgil Avenue & 4th Street	AM	0.478	A
		PM	0.531	A
6.	Normandie Avenue & 6th Street	AM	0.605	B
		PM	0.598	A
7.	Vermont Avenue & 6th Street	AM	0.717	C
		PM	0.670	B
8.	Shatto Place & 6th Street	AM	0.531	A
		PM	0.539	A
9.	Virgil Avenue & 6th Street	AM	0.503	A
		PM	0.536	A
10.	Rampart Boulevard & 6th Street	AM	0.665	B
		PM	0.788	C
11.	Alvarado Street & 6th Street	AM	0.628	C
		PM	0.558	B
12.	Vermont Avenue & Wilshire Boulevard	AM	0.846	D
		PM	0.810	D
13.	Shatto Place & Wilshire Boulevard	AM	0.461	A
		PM	0.372	A
14.	Hoover Street & Wilshire Boulevard	AM	0.646	B
		PM	0.621	B
15.	Vermont Avenue & 8th Street	AM	0.671	B
		PM	0.688	B

SOURCE: Gibson Transportation Inc, October 2018.

As shown in Table 5-39, all 15 of the signalized study intersections currently operate at LOS D or better during both the a.m. and p.m. peak hours. As detailed in **Table 5-40**, *Estimated Project Vehicle Trip Generation*, the Project is anticipated to generate a total of 1,136 net new trips on a typical weekday, 23 morning peak hour trips, and 109 afternoon peak hour trips.

TABLE 5-40
ESTIMATED PROJECT VEHICLE TRIP GENERATION

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Proposed Project								
Multifamily Housing (High-Rise)	256 du	530	6	48	54	34	15	49
Office	2,507 sf	24	2	0	2	0	2	2
High-Turnover Restaurant	11,300 sf	1,268	62	50	112	68	42	110
Internal Capture – 10% [d]			*(127)*	*(6)*	*(5)*	*(11)*	*(7)*	*(4)*
Transit/Walk-In Adjustment – 15% [e]			*(171)*	*(8)*	*(7)*	*(15)*	*(9)*	*(6)*
Pass-By Adjustment – 20% [f]			*(194)*	*(10)*	*(7)*	*(17)*	*(10)*	*(7)*
Fast Food Restaurant without Drive-Through	1,500 sf	433	23	15	38	22	21	43
Internal Capture – 10% [d]			*(43)*	*(2)*	*(2)*	*(4)*	*(2)*	*(2)*
Transit/Walk-In Adjustment – 15% [e]			*(59)*	*(3)*	*(2)*	*(5)*	*(3)*	*(3)*
Pass-By Adjustment – 50% [f]			*(166)*	*(9)*	*(6)*	*(15)*	*(9)*	*(8)*
Total Proposed Project		**1,495**	**55**	**84**	**139**	**84**	**50**	**134**
Existing Uses to Be Removed								
Private School (K–12)	170 students		422	83	53	136	12	17
Transit/Walk-In Adjustment – 15% [e]			*(63)*	*(2)*	*(18)*	*(20)*	*(3)*	*(1)*
Total Existing Trips			**359**	**81**	**35**	**116**	**9**	**16**
Total Net New Project Trips		**1,136**	**-26**	**49**	**23**	**75**	**34**	**109**

NOTES:
du = dwelling unit; sf = square feet.

[a] Trip generation rates are from Trip Generation, 10th Edition (Institute of Transportation Engineers, 2017) and are based on developments located in "General Urban/Suburban" area, unless otherwise noted.

[b] Trip generation rates for multifamily housing (high-rise) are based on developments located in "Dense Multi-Use Urban" area as detailed in Trip Generation, 10th Edition. These rates are not subjected to any transit/walk-in adjustment.

[c] Trip generation rates for general office are based on developments located in "Dense Multi-Use Urban" area as detailed in Trip Generation, 10th Edition. Daily trip rate is based on developments located in "General Urban/Suburban" area as no vehicle-rate is available for "Dense Multi-Use Urban" location. These rates are not subjected to any transit/walk-in adjustment.

[d] Internal capture adjustments account for person trips made between distinct land uses within a mixed-use development (e.g. residents and employees visiting the restaurant uses) without using an off-site road system.

[e] Per LADOT's Transportation Impact Study Guidelines (LADOT, 2016), the Project Site is located approximately 650 feet walking distance from a transit station (Metro Red/Purple Line Wilshire/Vermont Station), therefore a transit reduction is applied to account for transit usage and walking visitor arrivals from the surrounding neighborhoods and adjacent commercial developments.

[f] Per Transportation Impact Study Guidelines, a pass-by adjustment was applied to account for Project trips made as an intermediate stop on the way from an origin to a primary trip destination without route diversion.

SOURCE: Gibson Transportation Consulting, Inc., October 2018.

Existing Conditions

Table 5-41, *Existing Traffic Conditions with Project: Signalized Intersections (2018)*, displays the Project traffic volumes that were added the Existing Conditions shown in Table 5-39. As shown in Table 5-41, all of the 15 signalized study intersections would continue to operate at LOS D or better

during all of the analyzed peak hours under Existing with Project Conditions. Thus, the Project is not anticipated to trigger a significant traffic impact at any of the 15 signalized study intersections under Existing with Project Conditions, and no mitigation measures are required.

TABLE 5-41
EXISTING WITH PROJECT CONDITIONS: SIGNALIZED INTERSECTIONS (2018)

No.	Signalized Intersection	Peak Hour	Existing Conditions w/o Project		Existing with Project Conditions		Change in V/C	Significant Impact
			V/C	LOS	V/C	LOS		
1.	Vermont & 3rd Street	AM	0.802	D	0.804	D	0.002	NO
		PM	0.770	C	0.773	C	0.003	NO
2.	Virgil Avenue & 3rd Street	AM	0.751	C	0.751	C	0.000	NO
		PM	0.753	C	0.754	C	0.001	NO
3.	Vermont Avenue & 4th Street	AM	0.594	A	0.590	A	-0.004	NO
		PM	0.586	A	0.599	A	0.013	NO
4.	Shatto Place & 4th Street	AM	0.441	A	0.443	A	0.002	NO
		PM	0.399	A	0.417	A	0.018	NO
5.	Virgil Avenue & 4th Street	AM	0.478	A	0.479	A	0.001	NO
		PM	0.531	A	0.534	A	0.003	NO
6.	Normandie Avenue & 6th Street	AM	0.605	B	0.603	B	-0.002	NO
		PM	0.598	A	0.599	A	0.001	NO
7.	Vermont Avenue & 6th Street	AM	0.717	C	0.721	C	0.004	NO
		PM	0.670	B	0.681	B	0.011	NO
8.	Shatto Place & 6th Street	AM	0.531	A	0.549	A	0.018	NO
		PM	0.539	A	0.559	A	0.020	NO
9.	Virgil Avenue & 6th Street	AM	0.503	A	0.502	A	-0.001	NO
		PM	0.536	A	0.539	A	0.003	NO
10.	Rampart Boulevard & 6th Street	AM	0.665	B	0.664	B	-0.001	NO
		PM	0.788	C	0.792	C	0.004	NO
11.	Alvarado Street & 6th Street	AM	0.628	B	0.631	B	0.003	NO
		PM	0.558	A	0.562	A	0.004	NO
12.	Vermont Avenue & Wilshire Boulevard	AM	0.846	D	0.851	D	0.005	NO
		PM	0.810	D	0.813	D	0.003	NO
13.	Shatto Place & Wilshire Boulevard	AM	0.461	A	0.464	A	0.003	NO
		PM	0.372	A	0.381	A	0.009	NO
14.	Hoover Street & Wilshire Boulevard	AM	0.646	B	0.647	B	0.001	NO
		PM	0.621	B	0.622	B	0.001	NO
15.	Vermont Avenue & 8th Street	AM	0.671	B	0.669	B	-0.002	NO
		PM	0.688	B	0.691	B	0.003	NO

SOURCE: Gibson Transportation Consulting, Inc., October 2018.

Future Conditions

Future 2021 traffic volumes were developed to evaluate traffic conditions after completion of other planned related projects and the Project. These future traffic conditions include traffic volumes from related projects (approved or pending projects expected to be built by the year 2021 in the project vicinity) added to existing traffic conditions, plus one percent ambient growth in traffic per year. The related projects list is within a 1.5 mile radius of the Project. At that time is based on information provided by the Department of City Planning and LADOT as of July 12, 2018, as well as recent studies of projects in the area.

The growth factor accounts for increases in traffic due to small or re-use projects that do not require full traffic studies, potential projects not yet proposed or are in the early stages of development, as well as projects outside the Study Area or the general Wilshire Center/Koreatown area.[308]

Future traffic conditions representing the buildout conditions at the completion of the Project is shown in **Table 5-42**, *Future (2021) Traffic Conditions with Project: Signalized Intersections*, 10 of the 15 study intersections are anticipated to operate at LOS D or better during both the weekday morning and afternoon peak hours. The remaining five intersections are anticipated to operate at LOS E or F during at least one of the analyzed peak hours.

As detailed in Table 5-42, when measuring the Future with Project Conditions against Future without Project Conditions, the incremental increases in the V/C ratios resulting from Project traffic do not exceed the thresholds of the LADOT significant impact criteria at any of the 15 signalized study intersections. Thus, the Project is not anticipated to trigger a significant traffic impact at any of the 15 signalized study intersections under Future with Project Conditions.

Conclusion:

Operational traffic related impacts would be less than significant, and no mitigation measures are required.

Bicycle Plans and Programs

The Mobility Plan 2035, which was initially adopted by the City Council in August 2015 and amended in November 2015, January 2016, and September 2016, is a comprehensive update of the City's Transportation Element that incorporates "complete streets" principles. Government Code Sections 65302(b)(2)(A) and (B) require a circulation element (i.e., The Mobility Plan 2035) to provide for a balanced, multimodal transportation network that meets the needs of all users of street, roads, and highways. Per the statute, "all users" includes "bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors." This requirement was established as part of AB 1358, which is referred to as the California Complete Streets Act, as well as Caltrans Deputy Directive DD-64-R1, Complete Streets: Integrating the Transportation System.

[308] Traffic volumes for the related projects are included in Table 7 of the Transportation Study.

The City of Los Angeles Mobility Plan 2035 identifies a Bicycle Enhanced Network. Tier 1 bicycle lanes are bicycle facilities on arterial roadways with physical separation. Tier 2 and Tier 3 bicycle lanes are bicycle facilities on arterial roadways with striped separation.

TABLE 5-42
FUTURE (2021) TRAFFIC CONDITIONS WITH PROJECT: SIGNALIZED INTERSECTIONS

No.	Signalized Intersection	Peak Hour	Future w/o Project Conditions		Future with Project Conditions		Change in V/C	Significant Impact
			V/C	LOS	V/C	LOS		
1.	Vermont & 3rd Street	AM	1.022	F	1.024	F	0.002	NO
		PM	0.965	E	0.971	E	0.006	NO
2.	Virgil Avenue & 3rd Street	AM	0.819	D	0.819	D	0.000	NO
		PM	0.875	D	0.876	D	0.001	NO
3.	Vermont Avenue & 4th Street	AM	0.781	C	0.777	C	-0.004	NO
		PM	0.775	C	0.788	C	0.013	NO
4.	Shatto Place & 4th Street	AM	0.488	A	0.489	A	0.001	NO
		PM	0.467	A	0.487	A	0.020	NO
5.	Virgil Avenue & 4th Street	AM	0.638	B	0.639	B	0.001	NO
		PM	0.690	B	0.693	B	0.003	NO
6.	Normandie Avenue & 6th Street	AM	0.850	D	0.849	D	-0.001	NO
		PM	0.839	D	0.840	D	0.001	NO
7.	Vermont Avenue & 6th Street	AM	0.994	E	0.998	E	0.004	NO
		PM	0.989	E	0.996	E	0.007	NO
8.	Shatto Place & 6th Street	AM	0.652	B	0.664	B	0.012	NO
		PM	0.716	C	0.751	C	0.035	NO
9.	Virgil Avenue & 6th Street	AM	0.654	B	0.653	B	-0.001	NO
		PM	0.697	B	0.701	C	0.004	NO
10.	Rampart Boulevard & 6th Street	AM	0.933	E	0.931	E	-0.002	NO
		PM	1.026	F	1.029	F	0.003	NO
11.	Alvarado Street & 6th Street	AM	0.894	D	0.897	D	0.003	NO
		PM	0.830	D	0.835	D	0.005	NO
12.	Vermont Avenue & Wilshire Boulevard	AM	1.237	F	1.243	F	0.006	NO
		PM	1.293	F	1.296	F	0.003	NO
13.	Shatto Place & Wilshire Boulevard	AM	0.608	B	0.611	B	0.003	NO
		PM	0.537	A	0.545	A	0.008	NO
14.	Hoover Street & Wilshire Boulevard	AM	0.889	D	0.891	D	0.002	NO
		PM	0.858	D	0.859	D	0.001	NO
15.	Vermont Avenue & 8th Street	AM	0.837	D	0.835	D	-0.002	NO
		PM	0.944	E	0.946	E	0.002	NO

SOURCE: Gibson Transportation Consulting, Inc., October 2018.

Bicycle lanes are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists. Bicycle routes are identified as bicycle-friendly streets where motorists and cyclists share the roadway and there is no dedicated striping of a bicycle lane. Bicycle routes are preferably located on collector and lower volume arterial streets. Within the Study Area, bicycle routes are provided along New Hampshire Avenue north of 6th Street, 4th Street west of Hoover Street, and 7th Street east of New Hampshire Avenue.

Construction activities may encroach on the public right-of-way adjacent to the Project Site on 6th Street, resulting in temporary rerouting of pedestrian traffic and bicycle traffic. The Construction Management Plan would include measures to ensure bicycle safety along the affected bicycle facilities.

The Project would not add new driveways or alter rights of way along these roadways and, as such, would not interfere with programs, plans, or ordinances or policies that promote bicycle routes or access.

Conclusion:

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

Pedestrian Facilities

Construction:

Construction activities are expected to be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (ROW) (e.g., sidewalk and roadways) adjacent to the Project Site. The use of the public ROW along Shatto Place and 6th Street may require temporary rerouting of pedestrian traffic as the sidewalks fronting the Project Site would be closed. MM TRAF-1 (Construction Management Plan) would include measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering).

Conclusion:

With incorporation of MM TRAF-1, impacts to pedestrians would be less than significant during construction.

Operation:

During operation of the Project, pedestrian access to the residential units would be from a ground floor residential lobby accessible from a pedestrian pathway from Shatto Place. Each of the four ground floor office uses would have distinct entrances directly from the sidewalk along Shatto Place. Pedestrian access to the restaurant uses would also be from Shatto Place from a pedestrian entrance located to the south of the Project Site. Access to residential areas and ground floor restaurant and office use would be available via elevators and stairways in the parking levels. The Project would not mix pedestrian and automobile traffic. While there is a slight jog in the

sidewalk along Shatto Place near the commercial uses, the sidewalk would be wide enough to accommodate pedestrians and would be an adequate width for ADA compliance. Therefore, the Project would not interfere with programs, plans, or ordinances or policies that promote pedestrian access.

Conclusion:

Operational impacts would be less than significant, and no mitigation measures are required.

Transit Plans and Programs

A purpose of the City's Mobility Plan 2035 is to reduce vehicle trips, by focusing growth in proximity to public transit and expanding mobility through better quality public transit. The 2010 CMP for Los Angeles County describes the statutory requirement for analyzing the regional transit system as a mechanism for reducing congestion, providing minimum performance measures for transit analysis, and reporting on the function and adequacy of the CMP transit network.[309]

The Project Site and surrounding area served by numerous established transit routes. The Project is located less than 500 feet northwest from the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line. The Metro Purple Line route provides a connection between Mid-Wilshire/Koreatown and Downtown Los Angeles. The Purple Line Extension is under development that would ultimately extend westward for approximately 9 miles, providing additional stations at the Miracle Mile area, the City of Beverly Hills, Century City, and Westwood. In addition, numerous bus lines serve the Project Site including Metro Lines 16, 17, 18, 20, 201, 204, 720, and the Wilshire Center/Koreatown DASH line.

The total residual capacity of the analyzed transit lines during the morning and afternoon peak hours is approximately 13,021 and 11,748 additional riders respectively.[310] The Project's morning and afternoon peak hour person trips by transit are projected at five and 26 trips, respectively, or less than 1% of the total residual capacity of the bus lines during morning and afternoon peak hours.[311]

Furthermore, Los Angeles County voters approved Measure R, a half-cent sales tax increase for transportation, which has allowed Metro to develop projects to improve the existing transportation system. The Metro 2009 Long Range Transportation Plan (2009 LRTP), outlines a range of transit and highway projects throughout Los Angeles County that were aimed to improve mobility and address future growth, is currently in the process of an update to address transportation issues and projects identified by local jurisdictions, Councils of Governments, and transportation agencies. The Metro 2014 Short Range Transportation Plan identifies projects and programs that will be implemented in accordance with project priorities and funding schedules of the 2009 LRTP. It is recognized that with these plans in place, Metro will continue to maintain and expand regional transit service in order to accommodate demand in the region.

[309] Los Angeles County Metropolitan Transportation Authority, 2010 Congestion Management Program, Chapter 3.
[310] Transportation Impact Traffic Study for the 550 South Shatto Place Project, October 2018.
[311] Transportation Impact Traffic Study for the 550 South Shatto Place Project, October 2018.

Overall, the total transit capacity of the numerous transit lines can accommodate the Project's transit trips. Therefore, the Project would not interfere with programs, plans, or ordinances or policies that promote regional transit capacity.

Conclusion:

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

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?[312]

Less Than Significant Impact. The Congestion Management Program (CMP) a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in Los Angeles County made through the Regional Transportation Improvement Program and State Transportation Improvement Program processes. The CMP requires that a Traffic Impact Analysis (TIA) be performed for all CMP arterial monitoring intersections where a project would add 150 or more trips during either the morning or afternoon weekday peak hours.

The CMP analysis uses a demand-to-capacity (D/C) ratio to determine facility LOS. Similar to arterial monitoring intersections, a significant impact requiring mitigation occurs if a project's traffic causes an incremental increase in freeway segment D/C ratio of 0.02 or greater to a facility projected to operate at LOS F (D/C > 1.00) after the addition of project traffic.

Arterial Intersections

The Project would not add more than 50 peak hour trips at any of the arterial monitoring intersections nearest the Project Study Area. Therefore, further analysis of the CMP arterial monitoring intersections is not required.

Freeway Mainline Segment Analysis

The Project generates fewer than 150 trips during the peak hours and, therefore, would not add 150 or more peak hour trips to any freeway segment. No further CMP freeway segment analysis is required.

Conclusion:

The Project is considered to have a less than significant impact with respect to CMP intersections or freeways, and no mitigation measures are required.

[312] While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles travelled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on LADOT's adopted methodology under its Transportation Impact Study Guidelines, which requires use of LOS to evaluate traffic impacts of a Project.

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

Less Than Significant Impact. The Project as designed does not include development of any roadways or intersections. Vehicular access to the Project Site would be provided via a new full-access driveway on Shatto Place and would replace the existing curb cuts. The new driveway would be constructed to City design standards.

Pedestrian access to the residential units would be from the ground floor residential lobby accessible from a new pedestrian pathway from Shatto Place. Each of the four ground floor office uses would have distinct entrances directly from the sidewalk along Shatto Place. A new pedestrian access point to the restaurant uses would also be from Shatto Place from a pedestrian entrance located to the south of the Project Site. Access to residential areas and ground floor restaurant and office use would be available via elevators and stairways in the parking levels. The Project would not mix pedestrian and automobile traffic.

Short-term bicycle parking would be provided on the ground level, accessible from the sidewalk along Shatto Place. Long-term bicycle parking would be provided within the parking garage. These spaces are designed to be accessed via the elevators to the lobby, though bicyclists may choose to use the vehicular parking ramps and the driveways along Shatto Place. No dedicated bicycle lanes currently exist on Shatto Place or 6th Street, nor have any been proposed in the Mobility Plan.

Based on the discussion above, the Project would not substantially increase hazards for vehicles, pedestrians, and bicyclists accessing the Project Site due to a geometric design feature.

Conclusion:

Impacts related to hazards would be less than significant and no mitigation measures are required.

d. Result in inadequate emergency access?

Less Than Significant Impact. The Project Site is located in an established urban area that is well served by a roadway network. While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In addition, in accordance with City of Los Angeles requirements, the Project would develop a Construction Management Plan (MM TRAF-1), to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Long-term emergency access would continue to be provided as under existing conditions. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. Project Site access and circulation plans would be subject to review and approval by the LAFD.

Conclusion:

Impacts related to inadequate emergency access would be less than significant and no mitigation is required.

Cumulative Impacts: Transportation

Cumulative impacts on traffic associated with construction (e.g., an intermittent reduction in street and intersection operating capacity) are typically considered short-term adverse, but not significant. Each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures as part of a Construction Management Plan, to reduce potential traffic impacts during construction.

The future (2021) service level conditions presented in Table 5-42, *Future (2021) Traffic Conditions with Project: Signalized Intersections*, represent a combination of estimated trips from all related projects, as well as incremental annual growth, and are cumulative in nature. As shown in Table 5-42, cumulative traffic impacts would be less than significant.

The regional transportation analysis, including public transit, is based on CMP procedures that have been developed to address countywide cumulative growth impacts on regional transportation facilities. The CMP Guidelines contain procedures for monitoring land use development levels and transit system performance by local jurisdictions and Metro, and are used to inform planning of infrastructure improvements to meet future needs, including development of Metro's LRTP. The cumulative increase in transit demand under related projects is addressed and supported by the CMP and the Mobility Plan 2035. As such, related projects would be consistent with adopted policies, plans or programs regarding public transit. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of required bicycle and vehicle parking for their site populations.

As indicated in the discussion of Project impacts above, the Project would not have a significant impact on public transit and would be consistent with the City's Mobility Element 2035. The Project would result in a less than significant traffic impact during construction and operation and would implement a Construction Management Plan that would incorporate notification and safety procedures and controls. In addition, the Project would provide bicycle and vehicle parking in compliance with City Code requirements. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant. Although the Project and other related projects will cumulatively add transit ridership, the Project Site and Study Area are served by a vast amount of transit service. Overall, the total transit capacity of the numerous transit lines can accommodate the Project's transit trips.

Furthermore, Los Angeles County voters approved Measure R, a half-cent sales tax increase for transportation, which has allowed Metro to develop transit projects to improve the existing transportation system. The 2009 Metro Long Range Transportation Plan outlines a range of transit projects throughout Los Angeles County that aims to improve mobility and address future growth and Metro is currently in the process of an update to address transportation issues and projects identified by local jurisdictions. As stated earlier, the Purple Line Extension is under

development that would ultimately extend westward for approximately 9 miles, providing additional stations at the Miracle Mile area, the City of Beverly Hills, Century City, and Westwood. The first section of the Purple Line Extension between the new Wilshire/Western station and new Wilshire/La Cienega station is currently under construction and is scheduled for completion in 2023.

Furthermore, it is assumed that public transit providers would add additional service when required in order to accommodate cumulative demand in the region. Therefore, cumulative impacts on public transit would be less than significant and would not be cumulatively considerable.

Conclusion:

Cumulative traffic and transit impacts would be less than significant.

5.18 Tribal Cultural Resources

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

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant Impact. The California Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File (SLF), which contains records of sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on April 20, 2018, to request a search of the SLF for sacred lands. The NAHC responded to the request in a letter dated April 23, 2018, stating that the SLF search returned negative results for sacred lands within the Project Site.

Additionally, a record search was conducted on April 17, 2018, at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. This search included a review of all recorded archaeological resources and previous studies within the Project Site and a 1-mile radius of the Project Site. The records search results indicate that 89 cultural resources studies have been conducted within a 1-mile radius of the Project Site. Of the 1-mile record search radius, less than 25 percent has been subject to previous cultural resources surveys. Of the 89 previous studies, none overlap or are within the Project Site. The records search results also indicate that no prehistoric archaeological resources have been previously documented within the Project Site or within the 1-mile records search radius.

Pursuant to the requirements of AB 52 requiring government-to-government consultation, the City as the lead agency sent consultation notification letters via certified mail to Native American groups geographically and culturally affiliated with the Project Site on September 19, 2018

(**Table 43**, *Summary of AB 52 Consultation*). The letters included a description of the proposed Project, the description of the Project location, and a notification of the type of consultation being initiated. To date, the City has received one response from the Native American groups regarding consultation, the details of which are provided below.

TABLE 5-43
SUMMARY OF AB 52 CONSULTATION

Contact	Tribe/Organization	Date AB 52 Notice Sent	Response Received	Consultation Date	Consultation Finalized
Kimia Fatehi, Director, Public Relations	Fernandeño Tataviam Band of Mission Indians	9/26/2018	No response	—	—
Andrew Salas, Chairperson	Gabrieleño Band of Mission Indians – Kizh Nation	9/26/2018	Response receive 9/26/2018	12/4/2018	12/20/2018
Robert F. Dorame, Tribal Chair/Cultural Resources	Gabrielino Tongva Indians of California Tribal Council	9/26/2018	No response	—	—
Sam Dunlap, Cultural Resources Director	Gabrielino/Tongva Nation	9/26/2018	No response	—	—
Sandonne Goad, Chairperson	Gabrielino/Tongva Nation	9/26/2018	No response	—	—
Anthony Morales, Chairperson	Gabrielino/Tongva San Gabriel Band of Mission Indians	9/26/2018	No response	—	—
Charles Alvarez, Co-Chairperson	Gabrielino-Tongva Tribe	9/26/2018	No response	—	—
Joseph Ontiveros, Cultural Resource Director	Soboba Band of Luiseño Indians	9/26/2018	No response	—	—
John Valenzuela, Chairperson	San Fernando Band of Mission Indians	9/26/2018	No Response	—	—
Michael Mirelez, Cultural Resource Coordinator	Torres Martinez Desert Cahuilla Indians	9/26/2018	No response	—	—

As indicated above, only one response was received. The Gabrielino Band of Mission Indians-Kizh Nation (Kizh) responded on September 26, 2018, stating that the Project Site is located within a sensitive area for tribal cultural resources, and requesting formal government-to-government consultation. In an email correspondence on September 26, 2018, the Kizh Nation provided a map of the Original People of Los Angeles County depicting the Gabrielino territory. On December 4, 2018, representatives from the City and the Kizh Nation met via a telephone conference. During the call, the Kizh Nation provided their knowledge of the Project Site and their concerns about the proposed Project. The Kizh Nation indicated that the Project Site is archaeologically sensitive, but did not identify any known tribal cultural resources (as defined in PRC Section 21074) within the Project Site. The City requested additional information be submitted by December 18, 2018. To date, no additional information has been received and letters finalizing the consultation were sent on December 20, 2018.

As described earlier under Section 5.5, *Cultural Resources*, the Project Site has a low sensitivity for encountering prehistoric archaeological resources since there is a lack of deposits dating to the latest Pleistocene and Holocene, the period for which there is widely accepted evidence for people in Southern California. Nevertheless, the Project Site contains approximately 5 feet of fill placed in the historic period, which is considered sensitive for historic-period archaeological resources.

Although no substantial evidence was provided to support the Kizh Tribal claim that any known sacred lands or tribal cultural resources overlap with or occur within the Project Site, the City's review of the Kizh Tribal documentation concludes that the Project Site has potentially low sensitivity for buried archaeological resources that, once encountered, could potentially be considered a tribal cultural resource as defined in PRC Sections 21074, 5020.1(k), or 5024.1.

Therefore, mitigation for tribal cultural resources is not recommended because no known tribal cultural resources have been identified within the Project Site. The Project would further be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent tribal cultural resource discoveries. In the unlikely event that buried prehistoric archaeological sites that might be found through consultation to be tribal cultural resources, are encountered during construction, the Applicant would be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent tribal cultural resource discoveries. These standard City conditions require the immediate halt of construction activities in the vicinity of the discovery, the coordination with Native American tribes and the City, and for the development and implementation of appropriate measures for treating the discovery.

As stated above, as required by AB 52, consultation between the City and the Kizh Nation was conducted. No identified tribal cultural resources as defined in PRC Section 21074(a)(1) that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k) have been identified within the Project Site.

Conclusion:

Impacts would be less than significant and no mitigation is 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. As stated above, as required by AB 52, consultation between the City and the Kizh Nation was conducted. Based upon the consultation and the administrative record as a whole, the lead agency, in its discretion and supported by substantial evidence, has not

determined any potential resource to be significant pursuant to PRC Section 5024.1. Therefore, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts: Tribal Cultural Resources

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. Many of the cumulative projects identified would require redevelopment of properties in urban areas that are currently developed and have been previously disturbed, and the potential to encounter and cause a significant impact on tribal cultural resources is diminished. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws, including AB 52, and the City's conditions of approval, project impacts associated with tribal cultural resources would be less than significant. However, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant cultural resources impacts that could occur at the sites of the related projects. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources.

Conclusion:

Cumulative impacts related to tribal cultural resources would be less than significant.

5.19 Utilities and Service Systems

The following impact analysis pertaining to utilities and service systems includes information contained in the Sewer Capacity Availability Report (SCAR) processed by the City of Los Angeles Bureau of Engineering on August 23, 2018, the Service Advisory Request (SAR) from the City of Los Angeles dated May 2, 2018, and the description of existing and proposed topography/drainage and infrastructure for the Project Site prepared by Brandow & Johnston, Inc. These are included in Appendix H of this SCEA.

Would the project:

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

Water

Less Than Significant Impact. The facilities required to serve the Project Site include the large distribution system operated by the LADWP as well local infrastructure to meet the needs of the Project Site. As discussed under Item 5.19.b, below, LADWP can provide the needed water from its existing system pursuant of the provisions in the City of Los Angeles Urban Water Management Plan (UWMP) 2015. Therefore, LADWP would not require added facilities to meet the demand from the Project.

As regards to the local infrastructure, the Project consists of a mixed-use development that includes commercial and residential uses. Based on the Service Advisory Request (SAR), LADWP would provide the Project with domestic and fire water supplies, as provided by public water main lines located on Shatto Place and 6th Street. The water to serve the Project is anticipated to be provided from a 6-inch line from the 8-inch main line along Shatto Place and an 8-inch line off of the 24-inch main line off of 6th Street. The LADWP's SAR reports that the 8-inch main line in Shatto Place has a maximum pressure of 90 psi and the 24-inch main line 6th Street has a maximum pressure of 83 psi. One existing fire hydrant is located immediately adjacent to the Project Site at the southwestern corner of Shatto Place and 6th Street.

The proposed sizes and locations for the domestic water and fire water points of connection would be determined by the Plumbing engineer and Fire Sprinkler engineer, respectively, during design. The locations of the fire department connection would be determined based on feedback from the City of Los Angeles Fire Department. LADWP would be coordinated with accordingly based on the final location both domestic and fire water points of connection.

Based on the results provided by the LADWP within the SARs dated May 2, 2018, and October 10, 2018 (Appendix H), the two existing water main lines would have sufficient capacity to serve the Project's 57.7 afy demand. Therefore, there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the Project and the Project would not require the relocation or construction of new or expanded water facilities.

Conclusion:

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

Wastewater

Less Than Significant Impact. Wastewater in the City is collected and conveyed by three separate sanitary sewer systems owned and operated by LA Sanitation. The largest of these, the Hyperion Sanitary Sewer System, encompasses the majority of the City and also accepts sewage from 29 other jurisdictions. The Hyperion Sanitary Sewer System is a network of approximately 6,117 miles of gravity-fed sewer laterals and mains, pressurized mains, pump stations, treatment plants, and outfalls in the Pacific Ocean.[313] Wastewater generated within Downtown Los Angeles, including from the Project Site, is conveyed through the Hyperion Sanitary Sewer System and treated at the Hyperion Water Reclamation Plan (HWRP). The Hyperion Sanitary Sewer System serves a total of 600 square miles in the City and within other jurisdictions outside the City boundaries. The HWRP is the City's largest wastewater treatment facility and provides preliminary, primary, and secondary treatment processes, and also treats flows bypassed from the DTWRP and Los Angeles-Glendale Water Reclamation Plant (LAGWRP).[314] The Hyperion

[313] City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2017, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdey/~edisp/cnt012545.pdf. Accessed November 21, 2018.

[314] City of Los Angeles Department of Public Works, LA Sanitation, Integrated Resource Plan, Section 7 Existing Treatment Facilities https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010375.pdf Accessed November 21, 2018.

Sanitary Sewer System includes treatment plants, outfalls, and numerous sewer connections and major interceptors. The current treatment capacity of the Hyperion Sanitary Sewer System is approximately 550 mgd, including 450 mgd at the HWRP, 80 mgd at the Donald C. Tillman Reclamation Plan (DTWRP), and 20 mgd at the Los Angeles-Glendale Water Reclamation Plant (LAGWRP).

Following the secondary treatment of wastewater, the majority of effluent from the HTP is discharged through an outfall pipe located 5 miles offshore in the Santa Monica Bay. Treated sludge is discharged through a separate outfall pipe located 7 miles offshore[315] Effluent is required to meet the Los Angeles Regional Water Quality Control Board (LARWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's National Pollution Discharge Elimination System (NPDES) permit for the City of Los Angeles (Order No. R4-2017-0045, General NPDES Permit CA0109991) (NPDES Permit).[316] Recent data on the HWRP website indicates that on average 275 million gallons of wastewater enters the HWRP on a dry weather day. The One Water LA Plan updates the current estimate to 250 mgd and provides a 2040 estimated value of 283 mgd. Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd. Accordingly, there is a residual dry weather day capacity of 175 mgd, or 39 percent of the total. Taking into account the 2040 estimate of 283 mgd in the One Water LA Plan the dry weather capacity would be 167 mgd. During Project construction, a negligible amount of wastewater would be generated by construction workers using portable toilets provided at the Project Site. These portable toilets would be provided by a private company and the waste would be disposed off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled collection of the HTP. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

The existing public sanitary sewer main lines near the Project Site are maintained by the City of Los Angeles Department of Public Works, Bureau of Sanitation. An existing main line exists in each street adjacent to the Project Site including: an 8-inch vitrified clay pipe (VCP) running in

[315] City of Los Angeles Department of Public Works, LA Sanitation, Hyperion Water Reclamation Plant: Background, 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;jsessionid=OC5mKkIrvgk47Jz3HOpAYV_OfDk5Gl_5gBLd4piCaPse1o7aFh2h!1291451969!-507278767?_afrLoop=3349549090552117&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=eh7redhg_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D3349549090552117%26_afrWindowMode%3D0%26_adf.ctrl-state%3Deh7redhg_5. Accessed July 18, 2018.

[316] Los Angeles Regional Water Quality Control Board, Order No. R4-2017-0045, General NPDES Permit No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean. February 2, 2017. https://www.epa.gov/sites/production/files/2017-09/documents/npdes-ca0109991-r4-2017-0045-hyperion-2017-02-02.pdf. Accessed July 18, 2018.

Shatto Place, running south towards 6th Street and an 8-inch VCP in 6th Street running east towards South Westmoreland Avenue.

Construction

Construction of the Project would include all connections necessary to adequately link the Project to the existing City sewer system. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City. Construction-related impacts would be temporary and within the scope of the impacts evaluated in this SCEA. Further, the Project includes a Construction Management Plan (MM TRAF-1) that would minimize disruptions to through traffic flow, and that would consider any off-site utility improvements, as necessary. See Item 5.17, *Transportation*, for further discussion of the Project's Construction Management Plan.

During Project construction, a negligible amount of wastewater would also be generated by construction workers using portable toilets provided at the Project Site. These portable toilets would be provided by a private company and the waste would be disposed off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled collection of the HTP. As such, impacts would be less than significant and no mitigation measures are required.

Operations

As shown in **Table 5-44**, *Estimated Wastewater Generation*, implementation of the Project would generate approximately 44,271 gallons per day (gpd). Netting out the estimated existing wastewater generated on the Project Site, the Project would generate 42,911 gpd beyond existing conditions, or 0.043 mgd.

TABLE 5-44
ESTIMATED WASTEWATER GENERATION

Land Use	Sewage Generation Rate	Quantity	Total Generation
Existing Uses			
School	8 gpd/student[a]	170 students	1,360 gpd
Total Existing			**1,360** gpd
New Uses (Project)			
Residential Apartment – Bachelor	75 gpd/du	2 du	150 gpd
Residential Apartment – One Bedroom	110 gpd/du	150 du	16,500 gpd
Residential Apartment – Two Bedroom	150 gpd/du	92 du	13,800 gpd
Residential Apartment – Three Bedroom	190 gpd/du	8 du	1,520 gpd
Residential Apartment – Townhome	150 gpd/du	4 du	600 gpd
Office Uses	120 gpd/sf	2,507 sf	301 gpd
Restaurant: Full service indoor seat	30 gpd/seat	380 seats	11,400 gpd
		Total New	**44,271 gpd**
Existing Uses – Project		**Total Net**	**42,911 gpd**

NOTES:
gpd = gallons per day; du = dwelling unit; sf = square feet
[a] The sewage generation factor for schools includes classrooms and lecture halls, teacher offices, administration offices, laboratories, libraries, school cafeterias, storage, auditoriums, and gymnasiums.

SOURCE: Sewer Capacity Availability Report (SCAR) processed by the City of Los Angeles Bureau of Engineering on August 23, 2018

Given the current remaining 250 mgd wet weather flow capacity of the HWRP, the HWRP would have ample capacity to treat the Project's wastewater generation, at 0.043 mgd, which would account for a less than one percent increase in demand at the HWRP. As concluded in the SCAR (Appendix H) conclusions, and given existing and anticipated future capacity at the wastewater treatment facilities. Therefore, the Project would not require the relocation or construction of new or expanded wastewater facilities.

Conclusion:

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

Stormwater

Less Than Significant Impact. The existing Project Site is 98 percent impervious.[317] Construction activities would not increase the amount of runoff and exposed soils may retain some runoff. Drainage structures and improvements within the City are subject to review and approval by the City's Department of Public Works and Department of Building and Safety. As required by the Department of Public Works, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The Department of Public Works reviews and approves Municipal Separate Storm Sewer Systems (MS4) plans prior to

[317] Brandow & Johnston, Inc. Appendix H of this SCEA.

construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned MS4 facilities, such as catch basins and drainage lines, require approval from County Flood Control to ensure compliance with the County's Municipal NPDES Permit requirements.

Dewatering, treatment, and disposal of groundwater would be conducted in accordance with permitted requirements set forth by the Los Angeles Regional Water Quality Control Board (LARWQCB)'s Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater discharges.

As discussed in detail in Item 5.10, *Hydrology and Water Quality*, the Project would be designed to comply with the City of Los Angeles's Low Impact Development (LID) design standard. To facilitate this, the proposed stormwater Best Management Practice (BMP) that is considered are rainwater harvesting and/or bio-infiltration flow-through planters. The entirety of the new building's roof drains would be diverted to the rainwater harvesting and/or bio-infiltration flow-through planters and the overflow discharge would be discharged to Shatto Place and 6th Street via a curb drain or parkway drain.

The use of rainwater harvesting and/or bio-infiltration flow-through planters would meet City of Los LID standards. Environmental impacts associated with the development of the Project, including on-site drainage facilities, have been evaluated throughout this SCEA. As concluded herein, all potentially significant impacts associated with development of the Project, including on-site stormwater drainage facilities would be less than significant. Therefore, the Project would not require the relocation or construction of new or expanded stormwater facilities.

Conclusion:

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

Electricity

Less Than Significant Impact.

Construction

As discussed in Section 5.6, *Energy*, electricity demand from the existing on-site uses would cease during Project construction since the existing classroom facilities would be removed and operation of the existing church would be curtailed for renovation. During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. With implementation of PDF AIR-1, electricity would be used for cranes and welders. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site.

With implementation of PDF AIR-1, an annual average of approximately 160,257 kWh of electricity is anticipated to be consumed during Project construction, or a net annual average of 56,954 kWh after subtracting the electricity demand from the existing setting that would no longer occur. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

The estimated annual average construction electricity usage would be within the supply and infrastructure service capabilities of LADWP, as the construction demand would represent approximately 2.0 percent of the estimated net annual operational electricity demand for the Project, which would be within the supply and infrastructure service capabilities of LADWP.[318,319]

Operations

For Project operations, compliance with 2016 Title 24 standards and applicable 2016 CALGreen requirements, at buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 2,779,381 kWh per year. Pursuant to CALGreen and PDF GHG-1, the Project would also utilize low-flow kitchen and bathroom faucets, showerheads and toilets; landscaping that would consist of native and drought-tolerant plants and include energy efficient appliances. The Project would also include building features such as installation of energy-efficient lighting, heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants. In addition, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources procured by LADWP include wind, solar, and geothermal sources, which sources accounted for 29 percent of LADWP's overall energy mix in 2016, the most recent year for which data are available.[320] This mix represents the available off-site renewable sources of energy that would meet the Project's energy demand.

Based on LADWP's 2016 Power Integrated Resource Plan, LADWP forecasts that its total energy sales in the 2021–2022 fiscal year (the Project's buildout year) will be 26,835 GWh of electricity.[321,322] LADWP's 2016 Power Integrated Resource Plan sets forth a number of recommendations designed to meet the utility's key objectives. One of LADWP's key recommendations and strategies is to provide sufficient generation and requires LADWP to

[318] The percentage is derived by taking the annual average amount of electricity usage during the Project construction (56,954 kWh) and dividing that number by the annual amount of net electricity usage during Project operation (2,779,381 kWh) to arrive at 0.37 percent.

[319] Los Angeles Department of Water and Power, 2016 Final Power Integrated Resource Plan, Appendix A, 2016. Available at: https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB562207&RevisionSelectionMethod=LatestReleased. Accessed November 2018.

[320] California Energy Commission, Utility Annual Power Content Labels for 2016, Los Angeles Department of Water and Power.

[321] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

[322] Los Angeles Department of Water and Power, 2016 Final Power Integrated Resource Plan, Appendix A, 2016.

"procure sufficient generation and energy storage to meet long-term capacity requirements."[323] Therefore, the 2021 projected sales would be drawn from the readily available and sufficient energy supplies procured by LADWP, including short-term procurements as needed to meet peak demands.[324] As such, the Project-related net increase in annual electricity consumption would represent approximately 0.01 percent of LADWP's projected sales in 2021. In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage. Therefore, the Project would not require the relocation or construction of new or expanded electric power facilities.

Conclusion:

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

Natural Gas

Less Than Significant Impact. As discussed in Section 5.6, *Energy*, construction activities, including the construction of new buildings and facilities, would consume natural gas to power forklifts. As discussed in Section 5.6, *Energy*, the estimated annual average construction natural gas usage would be within the supply and infrastructure service capabilities of SoCalGas, as the construction demand would represent approximately 1.3 percent of the estimated net annual operational natural gas demand for the Project, which would be within the supply and infrastructure service capabilities of SoCalGas.

For Project operations, compliance with 2016 Title 24 standards and applicable 2016 CALGreen requirements, buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 5,052,197 cf per year. The Project would comply with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and CALGreen). Consistent with regulatory requirements and PDF GHG-1, the Project would also include building features that comply with and exceed CALGreen such as, installation of energy-efficient lighting; installation of energy efficient appliances, installation of insulation in sidewalls and roofs; sealant of potential sources of air leakage to reduce infiltration and exfiltration; and use of heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants.

Based on their 2018 California Gas Report, the California Energy and Electric Utilities estimate natural gas capacity within SoCalGas' planning area will be approximately 3,775 million cf per day in 2021 (the Project's buildout year).[325] The Project would account for approximately 0.0004 percent of the 2021 forecasted capacity in SoCalGas' planning area. Therefore, the Project would not require the relocation or construction of new or expanded natural gas facilities.

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[323] Los Angeles Department of Water and Power, 2016 Final Power Integrated Resource Plan, p. 193, 2016. Available at: https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB562207&RevisionSelectionMethod=LatestReleased. Accessed November 2018.

[324] Los Angeles Department of Water and Power, 2016 Final Power Integrated Resource Plan, p. 193, 2016.

[325] California Gas and Electric Utilities, 2018 California Gas Report, p. 102, 2018. Available at: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf. Accessed November 2018.

Conclusion:

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

Telecommunications

Less Than Significant Impact. As discussed in the memorandum of existing and proposed topography/drainage and infrastructure for the Project Site prepared by Brandow & Johnston, Inc. included in Appendix H of this SCEA, an existing 1.5-inch telecommunication conduit owned and maintained by AT&T (formerly PTT) runs along the Project Site's frontage on Shatto Place, connecting to an existing underground vault near the southeastern corner of the Project Site. Any street improvement activities conducted as part of the Project, would protect the existing conduit in place unless it is required to be removed and replaced by AT&T during the design review process. There are no existing cellular towers located adjacent to the Project Site and no cellular towers are proposed by the Project. The Project would not result in the relocation of expansion of telecommunication facilities.

Conclusion:

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

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

Less Than Significant Impact. As stated above, based on the Project's estimated net wastewater generation (42,911 gpd), the Project would generate a net water demand of approximately 51,493 gpd, or 57.7 acre-feet per year (AFY), without accounting for regulatory water conservation features beyond the reductions embedded in the wastewater generation rates used for calculating the demand.[326] The Project would be designed to meet Cal Green and Title 24 Building Standards Code (CALGreen Code). The Project would emphasize water conservation, which would be achieved through the use of energy star appliances, and low flow plumbing fixtures. With implementation of additional water conservation measures per regulatory requirements, and the Project's water conservation features, the Project's actual water demand would be less than the amount stated above. Compliance with water conservation measures required by State and City green regulations would reduce this estimated projected water demand.

The Metropolitan Water District's (MWD) 2015 Regional UWMP addresses the future of MWD's water supplies and demand through the year 2040. Evaluations are prepared for average year conditions, single-dry-year conditions, and multiple-dry-year conditions. The analysis for multiple-dry-year conditions (i.e., under the most challenging weather conditions such as drought and service interruptions caused by natural disasters) is presented in Table 2-4 of the 2015 UWMP. The analysis in the 2015 RUWMP concluded that reliable water resources would be available to continuously meet demand through 2040. In the 2015 RUWMP, the projected 2040

[326] The water demand would be consistent with the estimated net wastewater generation of the Project per Table 5-31, *Estimated Wastewater Generation*. To be conservative, 20 percent was added to this figure (to account for outdoor water use).

demand water is 2,201,000 afy, whereas the expected and projected 2040 supply is 2,941,000 afy based on current programs, and an additional 398,000 afy is expected to become available under programs under development for a potential surplus in 2040 of 1,138,000 afy.

According to the reliability data in the City of Los Angeles UWMP 2015, the most recent plan available, LADWP has sufficient supply to meet a total water demand of 675,700 afy by the year 2040. LADWP has programs to reduce the demand to 565,600 afy by 2040, a difference of 110,100 afy. To meet the reduced target, LADWP will reduce water consumption through conservation, increased recycled water use (including both non-potable and indirect potable reuse), and reduced reliance on imported water.[327]

The UWMP is based on SCAG growth projections and takes into account all expected regional growth. As indicated in the discussion in Item 5.14, *Population and Housing*, the Project's contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services. The projections are revised at four year intervals so as to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in a timely fashion so long as the resulting growth does not exceed the growth projections. The UWMP is updated at regular five year cycles and includes programs to meet the supply requirements.

The Project would result in an estimated net water demand of approximately 57.7 afy when fully occupied. The Project's increase in water demand would fall within the available and projected water supplies reported in the 2015 UWMP for the City for 2040 (675,700 afy), and would constitute less than 0.01 percent of the City's projected 2040 water supply.

Conclusion:

As there would be sufficient water supplies available to serve the Project, impacts regarding supply would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As stated in Item 5.19.b, operation of the Project would result in a net wastewater generation of approximately 42,911 gpd. Given the current capacity of the HTP, the HTP would have ample capacity to serve the Project's wastewater generation, which would account for a less than one percent increase in demand at the HTP.

Conclusion:

[327] City of Los Angeles Department of Water & Power Urban Water Management Plan 2015, page ES-20. https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-sos-uwmp;jsessionid=5LbPb84T8L1NqjtC1gPPJ4zTdy8pH9v2jhSzXRdFNgq0yn2BlwRy!-1475618025?_afrLoop=524836082942912&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D524836082942912%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dxwvvtybgj_4.

The Project would have a less than significant impact with respect on wastewater treatment capacity and no mitigation measures are required.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

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

Less Than Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services, as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The City of Los Angeles Bureau of Sanitation (BOS) is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multifamily dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multifamily residential, commercial, and industrial properties. The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

The remaining disposal capacity for the County's Class III (nonhazardous solid waste) landfills is estimated at approximately 103 million tons as of June 2017, the most recent data available.[328] The average daily disposal capacity is 30,449 tons per day and the average daily disposal rate is 16,657 tons per day, leaving a residual daily capacity of 13,792 tons per day. Waste from the City of Los Angeles is disposed of at primarily at the Sunshine Canyon and Chiquita landfill sites. Of the 103 million tons of remaining capacity within the County, 62.11 million tons, or approximately 60 percent, is located at the Sunshine Canyon landfill, which has a remaining life of 21 years. In addition to in-County landfills, out-of-County disposal facilities are also be available to the City of Los Angeles.

Planning to meet future needs is addressed in the Integrated Waste Management Plan (ColWMP). The ColWMP concludes that based on aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the ColWMP, the County anticipates that future Class III disposal needs can be adequately met through 2030 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices.

The City's Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, provides a long term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g. adding textiles to the blue bin recycling program; adding

[328] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2016 Annual Report. September 2017. Appendix E-2, Table 1. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF.

food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at C&D facilities new policies and programs, and the development of future recycling facilities.[329]

As shown in **Table 5-45**, *Projected Solid Waste Generated During Operation*, based on solid waste generation factors from the California Integrated Waste Management Board (CIWMB), the Project could generate a net of approximately 1,103.04 lbs/day (0.552 tons/day or 201.48 tons/year) of solid waste beyond existing conditions. The Project's 0.552 tons/day could be accommodated by the County's available regional landfills, and would comprise approximately 0.004 percent of the residual daily capacity of 13,792 tons per day. In addition, as discussed above, waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City's SWIRP goal of achieving a 90 percent solid waste diversion rate by 2025.

TABLE 5-45
PROJECTED SOLID WASTE GENERATED DURING OPERATION

Land Uses	Quantity	Factor[a]	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses					
School	170 students	1lb/student/day	170	0.085	31.025
		Total	**170**	**0.085**	**31.025**
Proposed Land Uses					
Residential	256 du	4 lbs/du/day	1,024	0.512	186.88
Restaurant	12,800 sf	0.005 lbs/sf/day	64	0.032	11.68
Office	2,507 sf	0.006 lbs/sf/day	15.04	0.008	2.92
		Total	**1,103.04**	**0.552**	**201.48**
		Net Increase (Existing/Proposed)	**933.04**	**0.467**	**170.46**

du = dwelling unit; lbs = pounds; sf = square feet

[a] Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, Accessed September 2018.

SOURCE: ESA, 2018.

Project construction would include the demolition of approximately 8,277 sf of existing buildings; the export of approximately 56,000 cy of excavated soil (associated with excavation for new building foundations and subterranean parking); and new construction totaling

[329] Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp;jsessionid=AgIoE85QVAFQnxqPpAdrn65Tc-m75Je2g-nC1ILEy8UCT1VM7lLo!-395322140!-1871668233?_afrLoop=11115782988512864&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D11115782988512864%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dgm4tpb8fc_4. Accessed September 2018.

approximately 235,744 sf. These activities would generate demolition-, excavation-, and construction-related waste including, but not limited to, soil, asphalt, wood, paper, glass, plastic, metals, and cardboard that would be disposed of in one of the County's inert debris engineered fill operations that are located throughout Los Angeles County, such as Sunshine Canyon landfill, Chiquita landfill, and Azusa Land Reclamation inert landfill.

As stated in MM HAZ-1, a Site Soil Mitigation Plan will be prepared and will be used in guidance for any hazardous materials encountered at the Project Site during grading and excavation activities. Hazardous soils will be handled, transported, and disposed of in accordance with SCAQMD Rule 1166 in Class I landfills, which are located out of County.

Construction and Demolition materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this Ordinance, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain AB 939 Compliance Permits and to transport C&D waste to City certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 94 percent. Therefore, the Project would not cause any significant impacts from generating solid waste in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

The waste generated by the Project would be incorporated into the waste stream of the City, but the City's diversion rates would not be substantially altered as a result. The Project does not include any component that would conflict with State or local laws governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. Thus, the Project would result in less-than-significant impacts regarding compliance with management and reduction statutes and regulations related to solid waste.

Conclusion:

Based on the factors discussed above, the Project would result in less than significant impacts regarding solid waste and no mitigation measures are required.

Cumulative Impacts: Utilities and Service Systems

Water Supply

While the majority of the related projects are not sufficiently close to the Project Site so that it would contribute with the Project to the demand on the adjacent infrastructure demand and capacity for meeting domestic demand and firefighting capacity, related project #41, *605 S. Vermont Avenue*, is located near the Project Site. However, all of the related projects, including related project #41, are subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Developers are required to improve facilities where appropriate and development cannot proceed without appropriate verification and approval by LADWP and LAFD, with funding by the developers. Required improvements by related projects, if they should occur, would be limited to minor, local improvements. Such improvements require only minor construction with very limited short-term construction impacts on traffic and perhaps noise. As noted above the Project would not require

improvements to local mainlines. Moreover, as the Project would not require the construction of any off-site water infrastructure because its projected demand can be met by existing facilities.

LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands within its jurisdiction. The UWMP prepared by LADWP is based on the growth projections that are provided in the SCAG RTP/SCS, which is updated on 4-year cycles to account for changes in growth rates, and which accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Each of the related projects is required to be consistent with the SCAG RTP/SCS projections in order to be accounted for in LADWP's UWMP current and projected available water demand. Should the related projects be accounted for in LADWP's UWMP, no significant cumulative water supply impact is anticipated from cumulative development. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by CWC Section 10912) within its service area. These contribute to ongoing evaluations to ensure facilities are adequate, and require infrastructure system improvements.

As discussed above, the Project's net demand on water supplies would fall within the available and projected water supplies projected in LADWP's UWMP. Related projects would be required to provide local connections subject to review for service availability, subject to LADWP water system rules and requirements.

Conclusion:

The Project's contribution to cumulative impacts on water supply would not be cumulatively considerable and cumulative impacts regarding water supply would be less than significant.

Wastewater

Development of the Project in combination with the related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. As discussed above, the HTP has an existing treatment capacity of 450 mgd and an average dry weather flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available.[330,331] The City has adopted an Integrated Resources Plan (IRP) that shows that the HTP will be able to accommodate growth within its service area to the year 2030.

As with the Project, all related projects in the City of Los Angeles would be subject to the provisions of the Municipal Code requiring provision of on-site infrastructure, improvements to address local capacity issues and payment of fees for future sewerage replacement and/or relief improvements. In addition, the potential need for the related projects to upgrade sewer lines to

[330] The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of 413 mgd, and peak wastewater flow of 850 mgd. (Information regarding peak flow is included in the IRP, Facilities Plan, Volume 1, Wastewater Management, July 2004; page 7-3.)

[331] City of Los Angeles Bureau of Sanitation, Hyperion Water Reclamation Plant. Available at: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=modqzbl8f_4&_afrLoop=33199812189076655. Accessed April 2017.

accommodate their wastewater needs is site-specific and there would be minimal, if any, direct cumulative relationship between the development of the Project and the related projects. None of the related projects is sufficiently close to the Project Site so that it would contribute with the Project to the demand on the adjacent infrastructure for conveyance capacity.

The SCAR analysis (Appendix H) described above for the Project impacts is based on a methodology that takes into account, among other factors, research and tracing of sewer flow levels upstream and downstream of the Project's point of connection, and research of the project location area for other recently approved SCARs to evaluate the cumulative impact of all known SCARs on the sewer system. Per the SCAR conclusions, and given existing and anticipated future capacity at the wastewater treatment facilities, Project wastewater generation impacts regarding wastewater facilities would be less than significant and its contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts related to wastewater would be less than significant.

Conclusion:

The Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts regarding wastewater would be less than significant.

Electricity

As with the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including anti-idling construction vehicle regulations, the 2016 Title 24 standards and CALGreen code, the City of Los Angeles Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code), and incorporate mitigation measures, as necessary. In addition, electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As stated in LADWP's 2016 Power Integrated Resource Plan, LADWP will continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The Power Integrated Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements.[332] Like the Project, development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet their respective needs. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area.

Conclusion:

[332] Los Angeles Department of Water and Power, 2016 Final Power Integrated Resource Plan, Appendix A, p ES-2, 2016.

The Project's contribution to cumulative impacts with respect to electricity plans as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Natural Gas

As with the Project, future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including the 2016 Title 24 standards and CALGreen code, the City of Los Angeles Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code), and incorporate mitigation measures, as necessary. In addition, natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed.[333] It is expected that SoCalGas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area, including the Project and related projects also served by the existing SoCalGas infrastructure, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate.

Conclusion:

The Project's contribution to cumulative impacts with respect to natural gas plans as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Telecommunications

Telecommunications are regulated by the Federal Communications Commission (FCC) and the California Public Utilities Commission (CPUC). Each of the related projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs.

Conclusion:

The Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The County promotes the efforts of individual jurisdictions to maximize waste reduction and recycling, expand existing landfills, and promote alternative technologies to reduce waste. Most notably, the City of Los Angeles, as part of its SWIRP, aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. The analysis of the Project's potential impacts, above, is based on landfill capacity and demand per the Countywide Integrated Waste Management Plan. Planning for landfill needs takes into account continuing cumulative demand

[333] Southern California Gas Company, History of SoCalGas (2018), Available at: https://www.socalgas.com/company-history. Accessed November 2018.

and increases in cumulative demand associated with growth. Therefore, the analyses associated with that plan take into account cumulative development.

Like the Project, the related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the City's Green Building Code, as applicable. As such, impacts to the solid waste from related projects would be less than significant. As discussed above, the Project would not generate solid waste that would exceed landfill capacities and the recycling of solid waste related to construction and operation of the Project would be required to comply with all federal, State, and local regulations including the City's Green Building Code and the SWIRP.

Conclusion:

The Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts related to solid waste would be less than significant.

5.20 Wildfire

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

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

No Impact. The Project Site is not located in an area of moderate or very high fire hazard.[334] Additionally, the Project Site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[335]

The Project Site is located in an established urban area that is well served by an existing roadway network. As shown in the City of Los Angeles General Plan Safety Element, *Critical Facilities and Lifeline Systems*, Western Avenue and Beverly Boulevard are the closest Selected Disaster Routes that could be utilized during a disaster event. These streets are also identified as disaster routes per the Los Angeles County Department of Public Works. While it is expected that the majority of the Project's construction activities would be confined on-site, some construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, in accordance with City of Los Angeles requirements, the Project would include MM TRAF-1, which requires the development of a Construction Management Plan to ensure that adequate emergency access is maintained and that through-access for drivers, including emergency personnel, along all roads would still be provided during construction.

[334] Zimas Website, http://zimas.lacity.org/, accessed May 2018.

[335] Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf, accessed September 2018.

Therefore, with respect to wildfire hazards, the Project construction would not result in the impairment of an adopted emergency response plan or emergency evacuation plan.

Conclusion:

No impact would occur and no mitigation measures would be required.

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

No Impact. The Project Site is not located in an area of moderate or very high fire hazard.[336] Additionally, the Project Site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[337] The Project is not located in a sloped area and is surrounded by urban development. As such, the Project would not exacerbate wildland risks, and would not expose occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire.

Conclusion:

No impact would occur and no mitigation measures would be required.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project will not require the installation of infrastructure that may exacerbate fire risk. Project operation would generate traffic in the Project Site vicinity and would result in some modifications to access to the Project Site from the streets that surround it. However, adequate access to evacuation routes and emergency access to the Project Site and to the surrounding area would continue to be provided. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project Site access and circulation plans would be subject to review and approval by the Los Angeles Fire Department (LAFD). For these reasons, and due to the fact that the Project Site is not located near any very high fire severity zone, operation of the Project would not substantially impair implementation of, or physically interfere, with an adopted emergency response plan or emergency evacuation plan.

Conclusion:

No impact would occur and no mitigation measures would be required.

[336] Zimas Website, http://zimas.lacity.org/, accessed May 2018.

[337] Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf, accessed September 2018.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is surrounded by urban development and is not adjacent to any wildlands. As discussed in Section 5.10, *Hydrology and Water Quality*, according to the City of Los Angeles General Plan Safety Element, the Project Site is not located with a 100-Year or 500-Year flood plain. In addition, the Project Site is not located within the proximity of an enclosed body of water. The nearest enclosed body of water is MacArthur Park Lake, located 0.73 miles southeast of the Project Site and surrounded by intervening development. The Project Site is also at a higher elevation (272 feet above mean sea level [MSL]) than MacArthur Lake (260 feet MSL), and therefore, the Project Site is not downstream of the water body. The Project Site is relatively flat with little topography that would expose people or structures to landslides. With implementation of the Project, rainwater harvesting and/or bio-filtration flow-through planters would be provided and the overflow discharge would be discharged to Shatto Place and 6th Street via a curb drain or parkway drain. The Project would not contain uses or activities that would exacerbate existing environmental conditions. As discussed in Section 5.7, *Geology and Soils*, the Project Site is not located within a landslide inventory area. As such, and combined with the fact that the Project Site is not within or near a very high severity fire zone, there is no impact in relation to risks associated with downslope or downstream flooding or landslides as a result of runoff or post fire slope instability or drainage changes.

Conclusion:

No impact would occur and no mitigation measures would be required.

Cumulative Impacts: Wildfire

The related projects are all located highly urbanized areas, would not contain wildland features, and are not located adjacent to any wildland areas. Any related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to fire and seismic hazards. All related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety.

Conclusion:

Based on the above considerations, the Project would not result in a cumulatively considerable contribution to cumulative impacts associated with wildfires.

5.21 Mandatory Findings of Significance

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

Less Than Significant with Mitigation Incorporated. The preceding analysis does not reveal any significant immitigable impacts to the environment. The Project Site is located within a highly urbanized area and is currently developed with an existing school and surface parking.

There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area.

However, the Project Site does include ornamental trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Wildlife Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Environmental impacts from Project implementation may result due to the loss of trees on the site. Therefore, the Project would include several mitigation measures. MM BIO-1 would require that prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. MM BIO-2 would ensure that any removal or planting of any tree in the public right-of-way would require approval of the Board of Public Works that required that new trees in the public right-of-way shall be provided at a 2-to-1 ratio per the standards of the Urban Forestry Division, Bureau of Street Services, Department of Public Works. MM BIO-3 would ensure that any trees affected by construction activities that might occur during nesting season be surveyed. If any active nests are detected, an appropriate buffer as determined by the biological monitor, shall be delineated, flagged, and avoided until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

As such, potentially significant impacts resulting to removal of trees or disturbance to nesting birds to nesting birds would be reduced to less-than-significant levels.

The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed in Section 5.5, Cultural Resources, impacts to the historical former church building on the Project Site would be less than significant. While no paleontological resources were identified within the Project Site based on the paleontological records search, the Project has the potential to encounter geologic units with high paleontological sensitivity (Pleistocene-age Older Quaternary alluvium and late Miocene-age Modelo/Puente Formation).

Since Project-related excavation is expected to extend to approximately 60 feet below existing surface, it could encounter paleontological resources below 5 feet and result in a potentially significant impact to paleontological resources. However, construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading and excavation activities, consistent with the prescribed Project specific mitigation measures.

Overall, based on the preceding analysis of potential impacts, no evidence is presented that the Project would degrade the quality of the environment.

Conclusion:

Impacts related to the substantial degradation of the environment would be less than significant with mitigation incorporated, as necessary.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulative considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

Less Than Significant with Mitigation Incorporated. Pursuant to Public Resources Code Section 21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of a transit priority project, other than those that do no need to be reviewed pursuant to Section 21159.28, based on substantial evidence in light of the whole record. Additionally, the SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated pursuant in prior applicable certified EIRs, CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts." The analysis of cumulative impacts need not be as in-depth as what is performed relative to the project, but instead is to "be guided by the standards of practicality and reasonableness." Additionally, the SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs (refer to Section 3, Transit Project Consistency Analysis). Where the City, as the lead agency, determines that a cumulative effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable.

The analysis of cumulative impacts provided herein is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects. The list of related projects was provided by the City of Los Angeles Department of Transportation (LADOT) and also includes other projects in the area based recent studies. A list of 118 related projects and one related infrastructure project in the Project study area is provided in **Table 5-46**, *Summary of Related Projects*. Related Projects are mapped in Figure 5-2, *Related Projects Map*. Although these projects serve as the primary bases for evaluation of cumulative impacts, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. The cumulative analyses for each environmental issue are provided below following the assessments of Project impacts.

A description of 167 related projects and four related infrastructure projects in the Project study area is provided in **Table 5-46**, *Summary of Related Projects*, below. Related Projects are mapped in **Figure 5-2**, *Related Projects Map*, below. The related projects are utilized to analyze cumulative impacts associated with Project implementation discussed above. Cumulative impacts for each checklist topic listed in Section 4 of the SCEA have been addressed. As discussed in each section above, the Project would not contribute a cumulatively considerable impact to any cumulative impacts outlined in this Section 4. As discussed in Section 5.4, *Biological Resources*, the Project Site includes ornamental trees that could support raptor and/or songbird nests. In addition, the Project would be removing some of the trees on site and within public right-of-way. Therefore, the Project would include several Project-specific mitigation measures (MM BIO-1, MM BIO-2, and MM BIO-3) that would reduce any potential impacts to nesting animals and require the appropriate amount of replacement trees. Related projects would also be required to comply with the City's tree requirements and to adhere to the MBTA and Fish and Wildlife code provisions; therefore, cumulative impacts to nesting birds would be less than significant.

As discussed in Section 5.5, *Cultural Resources*, the Project would include Project-specific mitigation measures MM CULT-1 through MM CULT-3 and MM GEO-1 to reduce potential impacts on cultural resources. These mitigation measures require specific construction procedures that provide for the monitoring of construction activity for potential resources, procedures for the protection and handling of resources should they be encountered, and final disposition of encountered resources. Many of the related projects would require excavation that could potentially expose or damage potential archaeological resources or disturb human remains. However, the related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, mitigation measures would be identified for those related projects that have the potential to cause significant impacts to undiscovered archaeological resources or to disturb human remains. Implementation of such mitigation measures for the related projects would avoid significant impacts to archaeological and paleontological resources and human remains.

As discussed in Section 5.9, *Hazards and Hazardous Materials*, the Project would include Project-specific mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 to address impacts regarding the potential presence of hazardous materials on the Project Site. Like the Project, many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. Such related projects would be required to use, store, remove, and/or transport all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with federal, state, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, or handling of hazardous materials, and that their development would not result in the release of existing hazardous materials. Each related project would be required to comply with existing federal, state, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators. Like the Project, related projects in the Project Site area located within Methane zones would be subject to developmental regulations pertaining to ventilation and methane gas

detection systems that are mandated by the City of Los Angeles and would reduce impacts with respect to releases or accidents related to methane gas to less-than–significant levels.

As discussed in Section 5.13, *Noise*, potentially significant noise impacts during Project construction would be reduced to less-than-significant levels through compliance with applicable regulations, implementation of the Project's PDFs, and implementation of the identified Project-specific mitigation measures.

As discussed in Section 5.17, *Transportation*, cumulative operational traffic impacts would be less than significant. Each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures as part of a construction management plan, to reduce potential traffic impacts during construction. Although the Project and other related projects will cumulatively add transit ridership, the Project Site and Study Area are served by a vast amount of transit service. Overall, the total transit capacity of the numerous transit lines can accommodate the Project's transit trips.

Conclusion:

Based on the analysis above, the City finds that with adherence to applicable regulations, PDFs, the SCAG 2016 RTP/SCS MMRP mitigations measures and Project-specific mitigation measures incorporated into the Project, the contribution of the Project to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

TABLE 5-46
SUMMARY OF RELATED PROJECTS

No	Address	Description	Size	
1	3323 W Olympic Boulevard	Condominiums	208	du
		Office	3,500	sf
2	619 S Westlake Avenue	Apartments	1	du
		Affordable Housing	77	du
3	1700 W Olympic Boulevard	Hotel	160	rm
4	2525 Wilshire Boulevard	Condominiums	160	du
		Retail	7,500	sf
5	2515 Beverly Boulevard	School	650	students
6	3060 W Olympic Boulevard	Retail	109,006	sf
7	805 S Catalina Street	Condominiums	300	du
		Retail	5,000	sf
8	3200 W Beverly Boulevard	Apartments	32	du
		Retail	5,867	sf
9	820 S Hoover Street	Condominiums	32	du
		Retail	4,500	sf
10	1728 W 7th Street	Restaurant	9,600	sf
		Bar	3,500	sf
11	100 N Western Avenue	Retail	76,500	sf
		Apartments	187	du

No	Address	Description	Size	
12	611 N Hoover Street	Yard	80	emp
		Office	20	emp
		Fleet	40	veh
13	1910 W Temple Street	Condominiums	205	du
		Apartments	46	du
		Retail	19,103	sf
14	422 S Lake Street	Apartments	80	du
15	1929 W Pico Boulevard	School	480	students
16	1633 W 11th Street	School	460	seats
17	688 S Berendo Street	Apartments	136	du
18	3869 W Wilshire Boulevard	Apartments	196	du
19	680 S Berendo Street	Apartments	177	du
20	685 S New Hampshire Avenue	Apartments	177	du
21	1322 W Linwood Avenue	Apartments	84	du
22	1329 W 7th Street	Apartments	94	du
		Retail	2,000	sf
23	3640 W Wilshire Boulevard	Apartments	209	du
24	968 S Berendo Street	Church	85,308	sf
25	135 Western Avenue	Restaurant	11,904	sf
26	940 S Western Avenue	Apartments	79	du
		Retail	8,000	sf
27	864 S Vermont Avenue	Apartments	411	du
		Retail	43,800	sf
28	535 S Kingsley Drive	Apartments	85	du
29	2005 W James M Wood Boulevard	Hotel	100	rm
30	2850 W 7th Street	Condominiums	200	du
		Retail	3,600	sf
31	800 S Harvard Boulevard	Apartments	131	du
		Retail	7,000	sf
32	2929 W Leeward Avenue	Condominiums	80	du
33	800 S Western Avenue	Apartments	96	du
		Retail	29,730	sf
		Restaurant	30,000	sf
		Hotel	148	rms
34	241 N Vermont Avenue	Apartments	100	du
		Retail	4,134	sf
35	4110 W 3rd Street	Hotel	171	rm
		Retail	2,800	sf
36	1011 S Serrano Avenue	Apartments	91	du
37	525 S Wilton Place	Apartments	88	du
38	3076 W Olympic Boulevard	Apartments	226	du
		Retail	16,907	sf
39	3350 W Wilshire Boulevard	Apartments	121	du
40	3545 W Wilshire Boulevard	Apartments	433	du

No	Address	Description	Size	
		Retail	49,849	sf
41	605 S Vermont Avenue	Apartments	103	du
		Museum	30,937	sf
42	1011 S Park View Street	Apartments	108	du
43	2965 W 6th Street	Hotel	99	rm
44	627 S Vermont Avenue	Apartments	179	du
		Restaurant	12,000	sf
45	2789 W Olympic Boulevard	Office	2,781	sf
		Retail	20,607	sf
46	1255 E Elden Avenue	Apartments	93	du
47	3100 W 8th Street	Apartments	100	du
48	3330 W Beverly Boulevard	Apartments	40	du
		Day Care	3,607	sf
		Office	368	sf
49	326 S Reno Street	Apartments	65	du
50	1017 S Mariposa Avenue	Apartments	79	du
51	427 S Berendo Street	Apartments	85	du
52	2405 W 8th Street	Apartments	144	du
		Retail	4,406	sf
53	2859 W Francis Avenue	Apartments	81	du
54	700 S Manhattan Place	Apartments	162	du
		Restaurant	6,500	sf
		Retail	3,500	sf
55	411 S Normandie Avenue	Apartments	224	du
56	3525 W 8th Street	Apartments	367	du
		Supermarket	22,906	sf
		Retail	16,513	sf
57	1030 S Lake Street	Assisted Living	338	beds
		Senior Housing	34	units
58	840 S Mariposa Avenue	Apartments	173	du
59	2250-2270 W Pico Boulevard	Hotel	125	rm
60	815 - 831 S Kingsley Drive	Apartments	90	du
61	329 S Rampart Boulevard	Apartments	45	du
		Affordable Housing	8	du
62	3986 W Wilshire Boulevard	Apartments	228	du
		Retail	16,955	sf
63	3875 W Wilshire Boulevard	Apartments	196	du
64	3800 W 6th Street	Condominiums	122	du
		Hotel	192	rms
		Retail	15,200	sf
65	2870 W Olympic Boulevard	Hotel	121	du
		Retail	17,850	sf
66	621 S Catalina Street	Apartments	165	du
		Retail	5,125	sf

No	Address	Description	Size	
		Lounge/Restaurant	12,210	sf
67	3216 W 8th Street	Condominiums	8	du
		Hotel	80	rms
		Retail	4,808	sf
		Karaoke	2,465	sf
68	2900 W Wilshire Boulevard	Retail	10,000	sf
		Restaurant	5,500	sf
		Apartments	644	du
69	616 S Westmoreland Avenue	Retail	745	sf
		Restaurant	2,360	sf
		Apartments	77	du
70	2649 W San Marino Avenue	Apartments	45	du
71	888 S Vermont Avenue	Office	4,400	sf
		Mixed Use	47,208	sf
72	3240 W Wilshire Boulevard	Hotel	162	rms
		Apartments	545	du
		Retail	5,222	sf
73	425 S Union Avenue	Apartments	33	du
74	1000 S Vermont Avenue	Apartments	236	du
		Retail	60,300	sf
75	1420 Bonnie Brae Street	Apartments	26	du
76	257 S Mariposa Avenue	Retail	4,630	sf
		Apartments	112	du
77	2501 W Olympic Boulevard	Apartments	173	du
		Retail	36,180	sf
78	3170 W Olympic Boulevard	Apartments	252	du
		Retail	32,300	sf
79	631 S Vermont Avenue	Hotel	200	rms
		Condominiums	250	du
		Office	49,227	sf
		Retail	21,230	sf
80	3700 Wilshire Boulevard	Retail	40,323	sf
		Restaurant	21,712	sf
		Condominiums	506	du
81	668 S Coronado Street	Apartments	122	du
		Retail	1,182	sf
82	3377 W Olympic Boulevard	Assisted Living	146	beds
		Medical Office	8,682	sf
		Restaurant	4,454	sf
83	748 S Kingsley Drive	Apartments	67	du
84	3600 W Wilshire Boulevard	Apartments	760	du
		Retail	66,539	sf
		Community Center	34,834	sf

No	Address	Description	Size	
85	3751 W 6th Street	Apartments	44	du
		Hotel	200	rms
		Retail	18,000	sf
86	1810 W Venice Boulevard	Self-Storage	154,024	sf
87	966 S Dewey Avenue	Hotel	99	rms
88	679 Harvard Boulevard	Hotel	110	rms
		Retail	1,840	sf
89	510 S Vermont Avenue	Office	2,166	emp
		Retail	17,500	sf
		Apartments	72	du
		Community Center	13,200	sf
		Apartments	246	du
90	500 S Oxford Avenue	Condominiums	89	du
91	635 Western Avenue	Apartments	220	du
		Retail	900	sf
92	923 Kenmore Avenue	Apartments	69	du
93	500 S Oxford Avenue	Condominiums	89	du
94	1930 Wilshire Boulevard	Apartments	478	du
		Hotel	220	rms
		Cultural Center	70,000	sf
95	637 S Ardmore Avenue	Apartments	428	du
		Retail	31,689	sf
96	350-362 S Alexandria Avenue	Apartments	59	du
97	3201 W Wilshire Boulevard	Retail	16,803	sf
98	1048 S Oxford Avenue	Condominiums	49	du
99	600 N Vermont Avenue	Apartments	80	du
		Retail	14,780	sf
100	609 N Dillon Street	Apartments	137	du
		Retail	18,000	sf
101	2335 W Temple Street	Apartments	71	du
102	1633 W 11th Street	School	460	seats
103	235 N Hoover Street	Apartments	214	du
104	1800 W Beverly Boulevard	Affordable Housing	21	du
		Apartments	222	du
		Restaurant	3,500	sf
105	689 S Catalina Street	Apartments	61	du
106	678 S Admore Avenue	Apartments	123	du
107	3440 Wilshire Boulevard	Apartments	641	du
		Retail	18,454	sf
108	950 S Berendo Street	Apartments	75	du
109	731 S Oxford Avenue	Apartments	92	du
110	4000 W 6th Street	Apartments	44	du
111	400 S Catalina Street	Apartments	80	du
112	1045 S Dewey Avenue	Apartments	67	du

No	Address	Description	Size	
113	846 S Mariposa Avenue	Apartments	38	du
114	3670 W Wilshire Boulevard	Condominiums	378	du
		Other	8,000	sf
115	1250 S Westmoreland Avenue	Senior Housing	93	du
116	714 S Grand View Street	Apartments	100	du
117	2842 W James Wood Boulevard	Apartments	193	du
		Retail	19,544	sf
118	694 S Oxford Avenue	Park	0.5	acre
Infrastructure Projects				
1	Current terminus at Wilshire/Western Station to Westwood/VA Hospital			

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

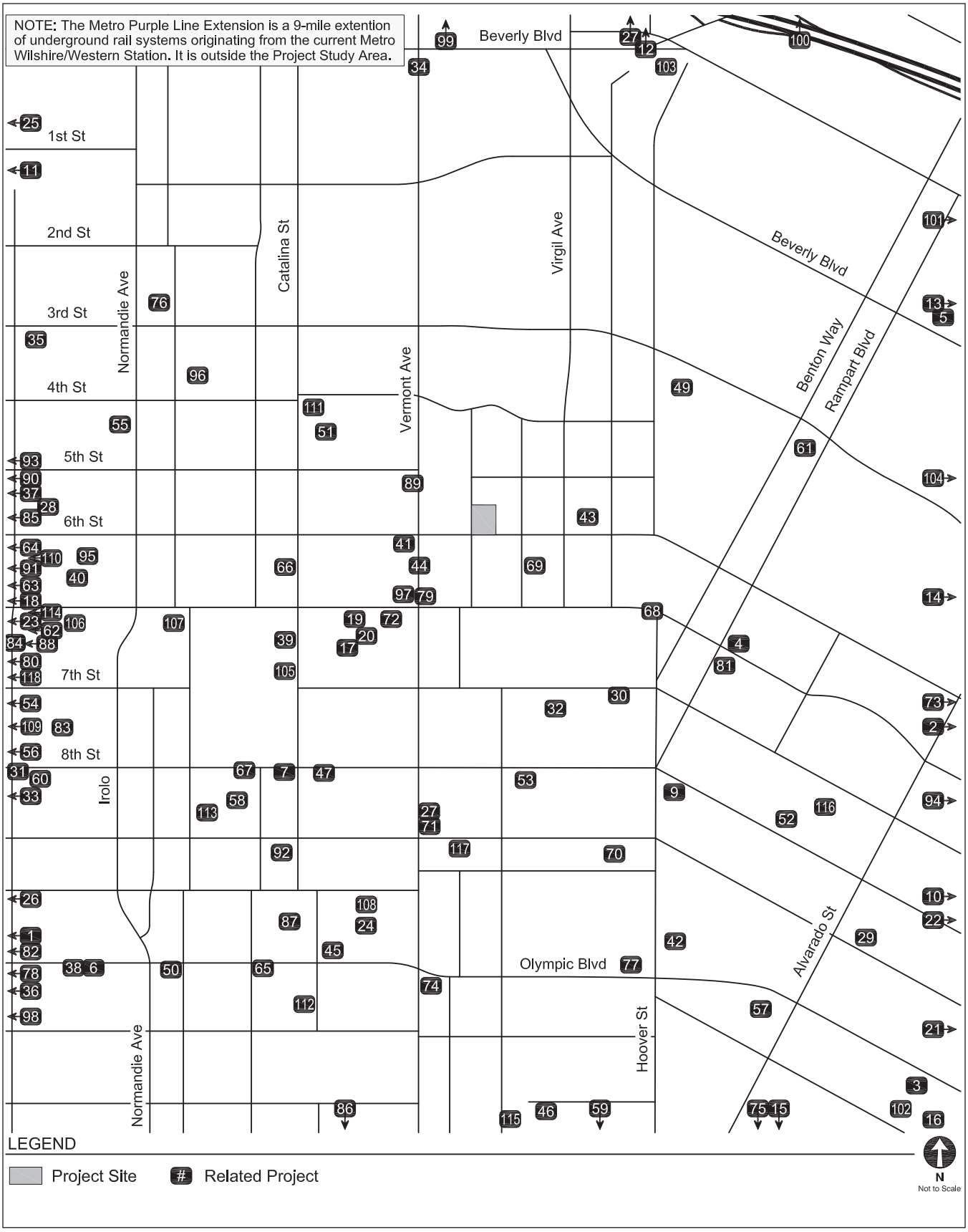
Less Than Significant with Mitigation Incorporated. For the purpose of this SCEA, a significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As discussed in Sections 5.3 *Air Quality*; 5.4, *Biological Resources*; 5.7, *Geology and Soils*; 5.9, *Hazards and Hazardous Materials*; 5.13, *Noise*; 5.17, *Transportation*; and 5.15, *Public Services*, with adherence to applicable regulations, project design features, the SCAG 2016 RTP/SCS MMRP mitigations measures, and Project-specific mitigation measures, Project-related impacts would be less than significant. The analysis contained in this SCEA concludes that the Project will not result in significant adverse effects after implementation of mitigation measures.

Conclusion:

Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures identified in Items 5.1, *Aesthetics*, through 5.20, *Wildfire*, above. As discussed above, the Project would include several Project-specific mitigation measures (MM BIO-1, MM BIO-2, and MM BIO-3) that would reduce any potential biological impacts to nesting animals and trees to less-than–significant levels. As discussed in Section 5.5, *Cultural Resources*, the Project would include Project-specific mitigation measures MM CULT-1 through MM CULT-3 and MM GEO-1 to reduce potential impacts on cultural resources. As discussed in Section 5.9, *Hazards and Hazardous Materials*, the Project would include Project-specific mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 to address impacts regarding the potential presence of hazardous materials on the Project Site and reduce any impacts to less-than–significant levels. As discussed in Section 5.13, *Noise*, potentially significant noise impacts during Project construction would be reduced to less than significant levels though implementation of Project-specific mitigation measures MM NOISE-1 through MM NOISE-7. As discussed in Section 5.15, *Public Services*, impacts to police services would be less than

significant with incorporation of Project-specific mitigation measure MM PS-1 through MM PS-3.

As discussed in Section 5.17, *Transportation*, construction-related potential impacts would be reduced to less than significant levels with Project-specific mitigation measures MM TRAF-1 through MM TRAF-5.



SOURCE: Gibson Transportation Consulting, Inc., 2018

550 Shatto Place

Figure 5-2
Related Projects Map